I grew up in Park Ridge, Illinois, a northwest suburb of Chicago. What is now Midway Airport was then Chicago’s main airport. One day when I was a little girl, my father took our family out to stand in what appeared to be a cornfield but actually was the site of Orchard Airport and a Douglas Aircraft assembly plant. The occasion was the dedication and renaming of this land to O’Hare International Airport. Although we were all visibly bored with the proceedings, my father said it was a momentous occasion and that someday O’Hare would be one of the busiest airports in the world.

Oh boy, was he ever right. Park Ridge and the surrounding suburbs were continuously battling the airport over the noise levels, which were deafening. They may still be at odds over the noise for all I know.

Not that I think, but I don’t know, that Paine Field will turn into another O’Hare. But make no mistake, you are opening the door.

Ann Babcock
Edmonds
Dear Ann Babcock:

Thank you for your comments to Paine Field Airport; they have been noted. Please refer to the following general responses (see Appendix S) that apply to your comments.

**General Response 1-10:** Scope of the EA analysis for future operations and passengers

**General Response 1-13:** Additional study should be conducted

**General Response 3-14:** What actions will require additional environmental review?
From: Bratcher, Kathryn [mailto:council.clerk@co.snohomish.wa.us]
Sent: Monday, February 08, 2010 11:18 AM
To: Air Service Comments
Subject: FW: Final comments for commercial air service at Paine Field

Forwarding for the record

-----Original Message-----
From: Koster, John
Sent: Sunday, February 07, 2010 6:23 AM
To: Bratcher, Kathryn
Subject: FW: Final comments for commercial air service at Paine Field

-----Original Message-----
From: Glen Bachman [mailto:gbachman@kemperdc.com]
Sent: Friday, February 05, 2010 3:17 PM
To: Air Service Comments; caylamorgan@faa.gov; County Executive; Gossett, Dave; 'brian.mukilteo@gmail.com'; Koster, John; Somers, Dave; Cooper, Mike
Subject: Final comments for commercial air service at Paine Field

I'm Glen Bachman,

I have lived at 433 Crown Drive, Everett, for more than 12 years, and in that time I have been able to see the potential for increased employment and lifestyle improvements in this county. There are a few critical elements that must come about, and passenger air service is definitely one of them. Since there is an absence of any negative environmental impact associated with the introduction of passenger air service, I am in favor of moving swiftly to allow the service to Snohomish County to begin.

I have been involved with Real Estate development for more than 20 years in Bellevue, I am a Certified Property manager, a Certified Real Property Administrator, and a Certified Shopping Center Manager. I can verify that in combination with the FAA EA study, and the earlier economic study submitted to the City of Everett that all of this information is proof positive of a sound economy for Snohomish County.

Please don’t hesitate to approve this event.

Sincerely,

Glen Bachman, CPM/SCSM/RPA
VP Retail Operations
Kemper Development Company
The Bellevue Collection | Bellevue Square  Lincoln Square  Bellevue Place
425-460-5838 office 425-460-5839 fax
gbachman@kemperdc.com
www.bellevuecollection.com
Response to Comment

Dear Glen Bachman, on behalf of Kemper Devel Corp:

Thank you for your comments to the FAA, Snohomish County, and Paine Field Airport; they have been noted.
From: johntbakerjr@comcast.net [mailto:johntbakerjr@comcast.net]
Sent: Sunday, January 31, 2010 12:31 AM
To: cayla morgan
Cc: Air Service Comments; editor@mukilteobeacon.com; letters@heraldnet.com
Subject: Comments on Draft EA for Commercial Air Service at Paine Field

Dear Ms. Morgan:

I have carefully reviewed the subject Draft EA from an unbiased perspective, combining my own direct observations with a careful assessment of the information presented in the Draft EA. I have significant interests in maintaining a high quality residential environment in the area of Paine Field. Those interests include: having a child in the local school system; having approximately $1.6M worth of real estate in the area; and having to navigate the highways of Mukilteo and South Snohomish County every day.

My primary residence for the past 14 years (4705 75th St. SW, Mukilteo) is within approximately 3500 feet NW of the north end of the main runway. Additionally, I currently own four other rental properties in the immediate vicinity of Paine Field:

- Two of them are within the Airport Influence Area: 4694 71st Pl SW, Mukilteo (~3500 feet NNW of north end of main runway)
- 8883 48th Pl SW, Mukilteo (~2500 feet W of main runway)
- Two of them are less than one mile from the NE limit of the Airport Influence Area:
  - 1694 71st Pl SE, Everett
  - 1515 Palm Ave, Everett

It is important to note that I am neither a proponent nor an opponent of commercial service at Paine Field. I anticipate rarely, if ever, using such service. I am also not connected to either The Boeing Company, or any other aerospace firm, or any government agency. My employment is not tied to the local South Snohomish County economy.

**Based on my thorough review of the Draft EA, I find no fault with its findings. It appears to me that the appropriate aspects of the environment were considered thoroughly and that the findings on all counts are entirely consistent with my experience, observations, and expectations. Please proceed to the Final EA.**

The arguments I’ve heard against the Draft EA are without factual support, and even lack defensible sincerity. I’ve heard everything from “our house values will drop by 30%” to “my kids won’t be able to learn in the noisy schools” to “the streets of Mukilteo will be jammed with cars and lined with prostitutes.”
To all of those claims I can only say that, if these things were ever going to be true, they would already be true. We already have many flights each day of much larger aircraft, so this isn’t an unknown, hypothetical situation we are considering. We should know exactly what to expect. And of course we do. The truth is, there is virtually no impact from the existing operations, which are much more significant than the proposed commercial traffic. Although they beg for the truth, the Chicken Littles of Mukilteo “Can’t Handle the Truth!” (think Jack Nicholson!)

As an example of the insincerity of the opposing arguments, these same people stood idly by as Boeing designed, sponsored, and placed into operation what is essentially a small airline comprised of one of the world’s largest aircraft models (i.e., the Dreamlifter fleet). Is that “Dreamlifter Airline” not at least the equivalent of a small scheduled airline? Should it not already have triggered at least some of the horrid noise calamities predicted? It didn’t.

My son was in the Mukilteo School District’s “gifted student” program from the 3rd through the 5th grades. At that time, the program was located in the school closest to Paine Field (i.e., Fairmont Elementary, less than one mile south of the proposed terminal building). I find it very curious that the School District would put its best and brightest students right under all of this “harmful” airport activity. Of course they did so because they have not experienced any problem with noise. This is substantiated by another personal observation...my son indicates that on not one single occasion were his classes ever interrupted by noise from airplanes...not once in 3 years...and that is with all those 747s, 757, 767s, and 777s going overhead! By the way, that school has not been specially sound proofed! Therefore, I conclude, based on direct, actual, and personal experience, that the school noise claims being made by the EA opponents are completely fabricated and could never be substantiated. If they could have, they would have. The EA substantiates my observation completely.

As for traffic concerns...In the past year, a new industry moved to south Paine Field (Korry Electronics). I believe they have around 600 employees. Wouldn’t you have thought they would have impacted the traffic in Mukilteo at least as much as the proposed commercial service? We haven’t seen a thing. And now Boeing is moving 750 engineers up to the Everett plant from Renton. No outrage from the opponents with the traffic that these moves will create? Curious indeed. Excepting the lawyer that Mayor Marine brought to town to fight commercial air service, we haven’t seen even one additional prostitute (i.e., one who debases ones talents for corrupt or unworthy purposes) on the streets!

As for real estate values...During the past 18 to 24 months housing prices have fallen precipitously in Mukilteo and all of Western Washington. I fully anticipate that our housing prices will continue to reflect the beautiful location and, for some, the convenience of being close to Paine Field and Boeing. Interestingly, after viewing numerous homes in Seatac WA and Des Moines WA (Zillow.com), I cannot find any evidence that the value of housing in those cities just south of Seattle-Tacoma International Airport took any different plunge after that airport opened its Third Runway.
(September 2008) than we did here in Mukilteo. Home values in all three areas plunged beginning early in 2008 (well prior to opening the new runway) and have yet to recover. Their plunge was for the very same reason as Mukilteo's...the collapse of the housing market due to financial irregularities in the banking/investment industries. I can see nothing that indictsthe Third Runway in this housing collapse. My real estate investments are and will be sound and safe even (and perhaps more so) with the advent of commercial air service.

Realistically, what is the driver for this debate? Answer: Interestingly, with a re-election campaign to wage and no factual basis to oppose the advent of commercial services at Paine Field, the Mukilteo Mayor (Joe Marine) and the former mayor (Don Duran) called in the "cottage NIMBY industry" that operates to oppose airports nationwide. This cottage industry is made up of one-issue law firms and consultants for hire (i.e., prostitutes). I do clearly understand that screaming "the sky is falling" was the only hope they had to stir up the electorate and stay in office. It clearly worked for them. However, that brands both of these politicians as NIMBYs of the worst kind....not only do they not want commercial airliners landing in "their" airport, they want to avail themselves and this town of all the benefits of being near the largest commercial aircraft production facility in the world. That is a pretty amazing position for the City of Mukilteo to take. It simply defies common sense...kind of like Michigan outlawing automobiles or California banning movies!

Please finalize the Draft EA and proceed with the introduction of commercial air service to Paine Field. I fully support the Draft EA as a defensible document based on the facts available to me and my own observations.

Sincerely
John T. Baker
4705 75th St. SW
Mukilteo WA 98275
(425) 220-4226
Dear John Baker:

Thank you for your comments to the FAA and Paine Field Airport; they have been noted.
-----Original Message-----
From: Cayla.Morgan@faa.gov [mailto:Cayla.Morgan@faa.gov]
Sent: Wednesday, January 20, 2010 4:50 PM
To: Waggoner, Dave; Dolan, Bill; Ryk Dunkelberg; Ryan Hayes
Cc: Patricia.Deem@faa.gov; Caroline.CTR.Poyurs@faa.gov; Roland.J.McKee@faa.gov
Subject: Fw: Paine Field Expansion

Cayla Morgan
Environmental Protection Specialist
Seattle Airports District Office
Federal Aviation Administration
425-227-2653

----- Forwarded by Cayla Morgan/ANM/FAA on 01/20/2010 03:49 PM -----
|------------------------|
| From: | "Mike Baker" <bakermichl@msn.com>

To: | Cayla Morgan/ANM/FAA@FAA
| Date: | 01/14/2010 07:30 PM
| Subject: | Paine Field Expansion

B.10
To Cayla Morgan

The draft EA misleads the public into thinking the air traffic can't expand from the version studied. The Mukilteo and local interest groups have commented on the draft EA. I support their comments.

Thank you
Mike Baker
14218 64th Ave W
Edmonds Wa 98026
Response to Comment

Dear Mike Baker:

Thank you for your comments to the FAA; they have been noted. Please refer to the following general responses (see Appendix S) that apply to your comments.

**General Response 3-14: What actions will require additional environmental review?**
The FAA has requested that Paine Field, in Snohomish County be opened for scheduled passenger service. To do this, the airport’s operating certificate must be changed to allow scheduled service. It currently is a general aviation airport. Part of the process is the preparation of an environmental assessment. A consultant presented the draft assessment in three recent public meetings. Final public comment is due by Feb 5th.

I request that the environmental assessment be redone for these reasons.

1) It only went out to 2016. The standard is 20 years.
2) It only addressed the initial request by two operators with their initial planned departures. Once the operating certificate is changed, there are likely many more requests to come over the years to come. The FAA thinks that each request should have its own environmental assessment. Incremental assessments won’t catch the true impact of the change. We should insist that the current assessment cover the likely growth over the next 20 years.
3) There was no assessment of on crime as the hotel business builds up.
4) The assessment methods used old procedures.
5) The schools and early learning location map was out of date.

There is every appearance of a pushing this change through without a true hearing. This needs a fair assessment.

Please help. Please insist that the environmental assessment be redone to standards agreed to by the impacted communities.

Mike Baker
14218 64th Ave W
Edmonds, Wa 98026
Response to Comment

Dear Mike Baker:

Thank you for your comments to Snohomish County; they have been noted. Please refer to the following general responses (see Appendix S) that apply to your comments.

General Response 1-8: Adequacy of FAA guidance and use of FAA guidance
General Response 1-13: Additional study should be conducted
General Response 3-5: Why was 2016 selected as the future year?
General Response 3-14: What actions will require additional environmental review?
General Response 7-8: Where are the schools located on the noise map?
General Response 9-6: What is the impact of the project on crime?
Ms. Morgan & Mr. Waggoner,

I am writing to express my concerns regarding the possible expansion of Paine Field. It is very tiring being called naïve at best or idiotic at worst, for believing promises made by our elected officials. When we moved to the area near Paine Field we knew about the agreement between the county and the community stating that Paine Field would not be expanded. If we wanted to live near a large airport we would have purchased a home south of town. We knew that we would be required to make a long drive to the airport, just as every other home owner and business owner did.

I not only live here, I work at a preschool in the area. When the large planes fly over heading for Boeing, all thought processes stop due to the severity of the noise. There are over 200 schools that will be affected by an expansion. That's asking a lot of students to sacrifice their concentration for airlines to line their pockets with an unnecessary expansion.

My husband and I are in our late 50's so we would be financially devastated if our property value drops through the basement. Soundproofing our home and the preschool would be cost prohibitive.

Why are we talking about just 6-10/planes per day when we all know that number is just a starter? This is deceptive. Obviously, the more flights, the more noise and air pollution.

The businesses that would be drawn to the area after the expansion would not complement the current businesses and, for the most part, would create low-paying jobs. I do not know one person jumping up and down about the possibility of a park-n-fly lot moving into the neighborhood. Do we really need more fast food restaurants, hotels and, dare I say it, drugs and prostitution?

The greed of people who do not live anywhere near here is disheartening. It's unbelievable that they don't care that they would be ruining a beautiful area and a thriving community. For example: Lake Serene is home to ducks, geese, eagles and even an otter. Greatly polluting the air will ruin the lake for animals and humans.

Furthermore, if the airlines are going to benefit, I do not want my tax dollars paying for any expansion related expenses. Talk about adding insult to injury! I have no problem with tax dollars being spent to do further analysis. What's wrong with getting it right instead of doing it quick and dirty to provide the answers wanted?

I know I am only one voice but hopefully you will consider my concerns about how this decision will affect so many lives.

Thank you,

Pam Balch
3618 Serene Way
Lynnwood, WA 98087
Dear Pam Balch:

Thank you for your comments to the FAA and Paine Field Airport; they have been noted. Please refer to the following general responses (see Appendix S) that apply to your comments.

**General Response 1-4:** The County should no longer seek FAA funds
**General Response 1-10:** Scope of the EA analysis for future operations and passengers
**General Response 1-13:** Additional study should be conducted
**General Response 2-1:** MRD document
**General Response 3-5:** Why was 2016 selected as the future year?
**General Response 3-14:** What actions will require additional environmental review?
**General Response 5-1:** Existing aircraft noise concerns
**General Response 7-7:** Noise impacts on schools
**General Response 9-1:** What is the impact upon property values?
**General Response 9-6:** What is the impact of the project on crime?
**General Response 9-7:** Project will bring in lower income people and low paying jobs
**General Response 11-1:** What is the impact on wildlife?
The EA does not consider the health hazards of ultra fine particulates on the health of the children in schools within a 1 km radius of the runway. References are embedded in attached comments.
January 27, 2010

Ms. Cayla Morgan
Environmental Protection Specialist
Seattle Airports District Office, Federal Aviation Administration
1601 Lind Avenue S.W.
Renton, WA 98057-3356.

Dear Ms. Morgan:

I am insulted by the recent Environmental Assessment (EA) regarding the proposed conversion of Paine Field from a Class IV to a Class I airport. The EA fails to adequately or responsibly identify the known potential impacts. The EA’s limited projection period of only five-years does not adequately address the known health risks associated with residing in close proximity to commercial airports. The 25 TPY that would put PAE above de minimis standards would require approximately a 25% increase in the estimate of total operations. Once the commercial certificate were to be issued, the commercial flights are likely to jump beyond the deceivingly low estimate of 20 operations a day to a much higher number, as happened in Bellingham for example. Additionally, the estimate that technology will become more clean is also liberal. The GA flights, with leaded particulates, and the jet flights with the even more hazardous addition of ultrafine particles, adds up to a deadly combination for the air quality in the residential zones surrounding Paine Field.

In a 2009 article, ‘Aircraft Emission Impacts in a Neighborhood Adjacent to a General Aviation Airport in Southern California’, University of California researchers discovered highly elevated ultrafine particle (UFP) concentrations downwind of the Santa Monica Airport (SMA). The author, Dr. Suzann Paulson, recently confirmed that we would expect to see an increased level of UFP’s given commercial flights at Paine Field, considering that meteorological conditions would increase the accumulation and concentrations at ground levels due to the lower night and winter temperatures compared to southern California daytime temperatures and SMA nighttime flight restrictions. Additionally, the South Coast Air Quality Management District made measurements of PM2.5, total suspended particles (TSP), lead, and ultrafine particle concentrations in the areas around SMA, and nearby Van Nuys Airport. They found highly elevated total suspended particulate lead, by up to a factor of 25 immediately adjacent to the takeoff

1 Jake Plante, FAA VALE Program Manager, Personal Conversation 01/28/10
3 Personal communication with Save Our Communities (www.socnw.org), January 26, 2010.
area and a factor of 7 higher than background in the residential area. They also observed spikes in ultrafine particle number concentrations associated with aircraft departures. A study of London Heathrow Airport\textsuperscript{5}, reported aircraft NO\textsubscript{x} at least 2.6 km from the airport. VOC, NO\textsubscript{x}, CO, and CO\textsubscript{2} were measured around the Zurich Airport\textsuperscript{6}.

Surrounding Paine Field are five schools, a community park, and a YMCA summer camp within 1 km of the airstrip. There are more than 15 schools within a 3 km radius. The FAA, Airport manager Dave Waggoner and the EA ignore the very serious and devastating impacts commercial flights at Paine Field will have on the community and the air quality at public and private schools and daycare facilities.

Residential property values decrease around airports because no one wants to subject themselves to health risk. It is unconscionable to change the classification of Paine Field considering the fact that the surrounding communities were built on the assumption that Paine Field would continue to be an airport used for general aviation and the Boeing company. Indeed, if the airport is expanded, we will have an ideal human case study on the epidemiological impacts on children raised within the vicinity of a commercial airport. The 37,000 + children who live in this community and attend elementary school, middle school, high school, day care and preschools deserve to breathe the cleanest air possible, not to be subjects of a misguided experiment in human health risks. They need us to stand up to this nonsense on their behalf. If you are not familiar with the affects of air pollution on children’s health, please see the studies published in Pediatrics (2004)\textsuperscript{7}.

As a resident and taxpayer in the United States of America, I am OPPOSED to commercial air service at Paine Field, and OPPOSED to my tax dollars being spent on any improvements or expansion of Paine Field that are related to commercial air service.

I expect you to make my voice heard, and do all in your power to protect the community and children living in the vicinity of Paine Field.

Sincerely,
Dr. Christina Bandaragoda

\textsuperscript{5} Carslaw, D. C.; Beevers, S. D.; Ropkins, K.; Bell, M. C. Detecting and quantifying aircraft and other on-airport contributions to ambient nitrogen oxides in the vicinity of a large international airport Atmos. Environ. 2006, 40, 5424–5434

\textsuperscript{6} Schmiamn, G.; Schr, K.; Jahn, C.; Hoffmann, H.; Buerfeind, M.; Fleuti, E.; Rappengluck, B. The impact of NO\textsubscript{x}, CO and VOC emissions on the air quality of Zurich airport Atmos. Environ. 2007, 41, 103–118

Dear Christina Bandaragoda:

Thank you for your comments to the FAA and Paine Field Airport; they have been noted. Please refer to the following general responses (see Appendix S) that apply to your comments.

General Response 3-5: Why was 2016 selected as the future year?
General Response 3-13: What is a Class I Airport? Explanation of Federal Aviation Regulations (FAR) Part 139
General Response 5-5: Study Areas
General Response 7-7: Noise impacts on schools
General Response 9-1: What is the impact upon property values?
General Response 9-8: What are the health and quality of life effects associated with the project?
General Response 10-4: Would there be an increase in fuel dump/fuel smell/residue?
General Response 10-5: Question regarding the analysis of PM10 and PM2.5
General Response 10-6: Toxics/HAPS
General Response 11-8: Cumulative impacts
-----Original Message-----
From: County Executive [mailto:county.executive@co.snohomish.wa.us]
Sent: Saturday, January 23, 2010 5:29 PM
To: Waggoner, Dave; Air Service Comments
Subject: FW: Paine Field development

Amy Ockerlander
Snohomish County Executive Office
3000 Rockefeller, M/S 407
Everett, WA 98201-4046
Phone: 425-388-3090
Fax: 425-388-3434
Email: amy.ockerlander@co.snohomish.wa.us
www.snoco.org

-----Original Message-----
From: Sanjaya Bandaragoda [mailto:sanjayab@gmail.com]
Sent: Friday, January 22, 2010 8:43 PM
To: County Executive
Subject: Paine Field development

Dear County Council,

You are our elected officials. You have the power to make the FAA and the Air Lines carry the full burden of the costs involved in developing the Air Port to a Class I. You will be held accountable for the privilege of exercising your power granted by the county citizens. The majority of your electorate are against this development. Please stop this abuse of power to satisfy short term business interest over the good of the communities. Your actions will follow your careers and beyond.

Regards,
Sanjaya Bandaragoda.
Response to Comment

Dear Sanjaya Bandaragoda:

Thank you for your comments to Snohomish County; they have been noted. Please refer to the following general responses (see Appendix S) that apply to your comments.

General Response 1-16: How will the proposal be funded?
Hello,

The current EA document is not clear enough or thorough enough to be used as the basis for decision making. It seems that the consulting firm was hired based on questionable credentials and made to write an assessment that is at the lowest passable standard. As a county authority I would expect the use of the highest level of standards and make sure that all possible alternatives are exhausted before subjecting the surrounding communities to the air and noise pollution that would result in commercial flights from Paine Field. There have been numerous studies conducted on negative long term health effects of pollution caused by Air Ports to the surrounding communities. It is inexcusable to stick to old methods and processes when there is new evidence of how pollution caused by takeoff and taxing effect communities that surround airports when evaluating Paine Field commercial flights. This EA if used to justify commercial flights from Paine Field, amounts to conducting pollution effects experimentation on at least 30,000 children and others that live near by. There are better alternative Air Fields that are not near high density residential areas that could be used instead of Paine Field.

Regards,
Sanjaya Bandaragoda
Smaller Airports May Endanger Health

California research finds higher pollution levels, though risks are unclear

Posted: December 4, 2009

HealthDay

By Steven Reinberg
HealthDay Reporter

FRIDAY, Dec. 4 (HealthDay News) -- As corporate and private jets take off and land at small airports across the country, their engine exhaust fills the air with small particles of combustion that could affect the health of people living nearby, suggests a new study by California researchers.

Though air pollution has long been recognized as a problem near major airports, far less research has been done on the situation near regional airports, which are seeing ever-increasing traffic, the researchers said.

"The impact area from the regional airport that we studied was much larger than the impact of a freeway," said lead researcher Suzanne E. Paulson, a professor of atmospheric chemistry at the University of California, Los Angeles.

"People who live near airports are exposed to high levels of the pollutants that come from airplane exhaust," she said.

Air pollution has been linked to heart disease, asthma and other serious medical problems, Paulson said. A report on the research was published online Nov. 20 in Environmental Science & Technology.

For the study, Paulson's team measured air pollutants near the Santa Monica Airport, an airport for private planes and corporate jets in southern California. They found a greatly increased level of tiny particles called ultrafine particles, which are less than 1/500th the width of a human hair.

In fact, the amount of these particles present in the air was up to 10 times higher downwind from the airport, at a distance of about one football field, and 2½ times higher at a distance of about six football fields.

How bad these ultrafine particles are for people's health is not known, Paulson said. "There are indications that very small particles have a lot of toxic effects, but we haven't looked at these particular particles," she said.

"But, operating on a precautionary principle, I wouldn't want to live downwind of a takeoff area from an airport," she added.

Paulson admits that there is little that can be done to reduce pollution near established airports. But planning for new airports should include a buffer area between the airport and homes and
businesses, she said.

John Clark III, a researcher in the department of epidemiology at the University of Miami Miller School of Medicine, said that "these smaller particles can have a health effect."

But he acknowledged that many people who live near airports might have few if any options, and creating a buffer zone at existing airports also might not be possible.

In addition, because the exact health effect of this type of pollution is not known, Clark said it's too early to make a case that these airports should be closed or people should be moved to other locations.

Nonetheless, he said, the information should help inform and provide more evidence to residents and public health officials of the extent of the pollution and perhaps spur new research to identify the health risks.

"This study shows that noise pollution may not be the only health hazard of living near an airport," Clark said.

**More information**

The U.S. Environmental Protection Agency has more on air pollution.
Dear Sanjaya Bandaragoda:

Thank you for your comments to Paine Field Airport; they have been noted. Please refer to the following general responses (see Appendix S) that apply to your comments.

General Response 1-8: Adequacy of FAA guidance and use of FAA guidance
General Response 1-9: Roles of consultant and their qualifications
General Response 1-11: Flawed/inadequate/biased EA
General Response 4-1: Alternative airports should be used
General Response 7-7: Noise impacts on schools
General Response 7-8: Where are the schools located on the noise map?
General Response 9-8: What are the health and quality of life effects associated with the project?
General Response 10-6: Toxics/HAPS
General Response 11-8: Cumulative impacts
----- Original Message ----- 
From: Cayla.Morgan@faa.gov [mailto:Cayla.Morgan@faa.gov] 
Sent: Friday, February 05, 2010 1:48 PM 
To: Waggoner, Dave; Dolan, Bill; Ryk Dunkelberg; Ryan Hayes 
Cc: Patricia.Deem@faa.gov; Caroline.CTR.Poyurs@faa.gov; 
Roland.J.McKee@faa.gov 
Subject: Fw: Questionable Environmental Assessment 

Cayla Morgan 
Environmental Protection Specialist 
Seattle Airports District Office 
Federal Aviation Administration 
425-227-2653

----- Forwarded by Cayla Morgan/ANM/FAA on 02/05/2010 12:48 PM ----- 
|-----| 
|From: Sanjaya Bandaragoda <sanjayab@gmail.com> 
|-----| 
|To: Cayla Morgan/ANM/FAA@FAA 
|-----| 
|Date: 02/05/2010 11:17 AM 
|-----| 
|Subject: Re: Questionable Environmental Assessment 
|-----|
Here are articles describing the effects of pollutions and questions on the EA.

On Fri, Feb 5, 2010 at 11:10 AM, Sanjaya Bandaragoda <sanjayab@gmail.com> wrote:

Hello,

The current EA document is not clear enough or thorough enough to be used as the basis for decision making. It seems that the consulting firm was hired based on questionable credentials and made to write an assessment that is at the lowest passable standard. As a federal authority I would expect that FAA would use the highest level of standard and make sure that all possible alternatives are exhausted before subjecting the surrounding communities to the air and noise pollution that would result in commercial flights from Paine Field. There have been numerous studies conducted on negative long term heal effects of pollution caused by Air Ports to the surrounding communities. It is inexcusable to stick to old methods and processes when there is new evidence of how pollution caused by takeoff and taxing effect communities that surround air ports when evaluating Paine Field commercial flights. This EA if used to justify commercial flights from Paine Field, amounts to conducting pollution effects experimentation on at least 30,000 children and others that live near by. There are better alternative Air Fields that are not near high density residential areas that could be used instead of Paine Field.

Regards,
Sanjaya Bandaragoda

(See attached file: PAE EA Comments_SST PH_020110.pdf)(See attached file: Smaller Airports May Endan.pdf)
NEPA Environmental Assessment Review


Submitted by
Sound & Sea Technology
3507 Shelby Road
Lynnwood, WA 98087

Submitted to
Dave Waggoner, Director, Snohomish County Airport
3220 100th St. SW Suite A, Everett, WA 98204

Cayla Morgan, Environmental Protection Specialist
Seattle Airports District Office, FAA
1601 Lind Ave. SW, Renton, WA 98057-3356.

1 Introduction
The draft Environmental Assessment for Amendment to the Operations Specifications for Air Carrier Operations, Amendment to a FAR Part 139 Certificate, and Modification of the Terminal Building Payne Field, Mukilteo, WA (EA) must be rewritten. The draft EA fails to concisely provide sufficient evidence and analysis for determining whether to prepare an environmental impact statement or a finding of no significant impact (40 CFR 1508.9). It does present some brief discussions; however, most of the document is simply a jumble of confusing responsibilities, unsupported conclusions, passive voice construction and inaccurate representation of legal requirements.

As presented, the EA cannot provide an effective environmental tool to comply with the National Environmental Policy Act (NEPA) Section 101 or 102. If left unrepaired, this EA will not help any agency or decision maker achieve the purposes of the NEPA implementing regulations (40 CFR 1500.1(a)), provide information to the public before decisions are made (40 CFR 1500.1(b)), or to help public officials make decisions based on understanding of environmental consequences of their actions (40 CFR 1500.1(c)).

The EA adds further complication with a confusing jumble of multiple agency jurisdictions, inaccurate compliance descriptions and an apparently arbitrary and capricious selection of alternatives and environmental issues. All told, the EA cannot demonstrate the requisite "hard look" the courts frequently use as an Environmental Document standard. It cannot be expected to inform an agency decision maker and, thus, fails to comply with the Administrative Procedures Act, National Environmental Policy Act (NEPA) and Endangered Species Act (ESA).

2 Proposal for Action (40 CFR 1502.4(a), 1502.14, 1502.5)
A "proposal" for action triggers the NEPA process. The EA should clearly and concisely describe the scope of the proposed action, answering who, what, when, where and how.

The following descriptions of the proposed action were found in the EA:
Page A.4...

- Issuance of the proposed operations specifications amendment for Horizon Air to permit scheduled commercial air service at Paine Field using the Bombardier Q400 Dash 8 as its primary aircraft and the Bombardier CRJ700 as its substitute aircraft pursuant to 14 CFR Part 119;

- Issuance of the proposed operations specifications amendment for Allegiant Air to permit scheduled commercial air service at Paine Field using the MD83 aircraft pursuant to 14 CFR 119;
• Approval of an amendment to the FAR Part 139 operating certificate for Paine Field; and,
• Approval of Airport Improvement Program (AIP) funding for the construction of modular terminal building sufficient to accommodate the proposed passenger service.

Page A.4...
• $3M modular terminal building
• 2010 spring construction
• 2010 summer service start

Figure page A.7...
• Site shown on existing tarmac (an addition to the existing terminal building with existing parking)

The EA must be revised to clarify which agency is responsible for this proposed action. As written, the EA is unclear about which entity, FAA, Snohomish County or Paine Field is responsible for planning and implementing the proposed action; the action proponent. Who makes the decision to implement this proposal? In section A and B, FAA is seen as the action proponent. However, later the reader is led to believe that Snohomish County is the action proponent.

The only one of these agencies having the NEPA compliance requirement is FAA. Snohomish County and Paine Field are subject to the Washington State Environmental Policy Act (SEPA). The relationship among these three agencies is not addressed in the EA. The EA begins with FAA as the action proponent and responsible agency, but later indicates that Snohomish County has some involvement in coastal land use management.

The two “applicant” airlines and the underlying logic of their applications are not fully addressed. Furthermore, the two applications are addressed as one, inseparable application. The EA is silent on what discretion the agencies do have in issuances and approvals. The EA only ascribes “limited discretion” to agencies. If a federal agency has no discretion at all, the proposal is not a “major federal action” and there is no NEPA requirement. However where there is discretion, even some, the range of that discretion partly defines the NEPA scope (40 CFR 1508.25), including actions, alternatives and impacts.

If FAA is the action proponent, then, in addition to federal “ownership” of Tribal Consultation and Historic Preservation requirements (C.15/D.15 Historical, Architectural, Archeological, and Cultural Resources), FAA would also be responsible for federal consistency to the maximum extend practicable within the discretion of that agency (15 CFR 930.32(e)(2)) under the Coastal Zone Management Act (CZMA). FAA would also be responsible for consulting with both US Fish and Wildlife Service (USFWS) and the National Oceanic and Atmospheric Administration (NOAA) Fisheries Service (50 CFR 402.1) regarding potential of the proposal to affect listed species and/or critical habitats under Section 7 of the Endangered Species Act (ESA). If this proposal is a federal action under FAA’s lead, there would be no direct requirement to comply with State and local ordinances for which federal sovereignty has been waived. See, for example the Clean Water Act, Clean Air Act and CZMA.

If Snohomish County is the action proponent, then we understand why the EA silent about compliance with such uniquely federal requirements as the Magnuson-Sevens Fishery Conservation and Management Act and essential fish habitat. In the Coastal Resources section, Snohomish County is indicated as the responsible agency for making a determination of consistency and consulting with the State. As noted above, FAA as the lead agency would be the responsible agency for making a determination of consistency and consulting with the State. If Snohomish County is an applicant, then they are responsible for requesting FAA engage the resource agencies NOAA Fisheries and USFWS, or obtain written authority from FAA to conduct such consultation themselves. The Washington State Department of Ecology (Ecology) is responsible for evaluating the proposed action and agreeing or disagreeing with the proponent’s determination of consistency of the proposed action. Unfortunately, the EA never explains who the action proponent is and fails to address the complexities of regulatory enforcement.
3 Need for Action (40 CFR 1502.13)

The existence of an underlying need justifies the proposal to take action, authorizes the agency action, defines the range of alternatives and forms the basis to create a "No Action" alternative. The EA should identify the proponent agency mission or policy that needs to be fulfilled and why. It should clearly and concisely describe the goal, or objective of the proposal.

The EA presents a wordy and illogically circular picture of purpose and need that should be revised to clarify the need and present a clear purpose. Need is presented as an FAA requirement to respond to requests for modifying an operating certificate and funding of facility construction. The airlines are requesting the certificate modification. However, we are not told which agency has requested funding and through what federal process that funding may be provided.

Following the discussion of need and purpose the EA points to accommodating the proposed scheduled commercial air service as both a purpose and need. A need cannot be a purpose. A need is a requirement, necessary duty or obligation whereas a purpose is an intended desired result. As noted above, the reader is not told which agency has this need ... or purpose. It would seem accommodating scheduled air service is the cooperative purpose of Snohomish County, Paine Field and FAA.

The reader is still left wondering why here at Paine Field and why now. What is the need for expanding air operations at Paine Field at this time? Given the language of purpose and need in the EA and NEPA regulations and case-law, the actual need for this proposed action must involve an aspect of why the air carriers have selected Paine Field and why the air carriers believe now is the time to expand their operations. The notice of intent from Horizon Air provided in Appendix A is insufficient for describing need; only one paragraph describing intent to initiate scheduled air service at Paine Field. The Appendix does not provide any equivalent letter from Allegiant Air.

On page A.2, the EA notes the applicant is not required to provide justification for wishing to serve a particular airport. The quotation from 49 USC 44705 identifies the responsibility of FAA in regards to the operating certificate, including the responsibility to specify the places to and from which and the airways over which a person may operate an air carrier. The EA has confused justification with rationale. A reasonable person would conclude that FAA, in evaluating safety of the airways and airport operations would become familiar with the underlying rationales and flight plans (i.e., needs and purposes) not to justify, but to evaluate a proposal to initiate scheduled service.

Then, in a final misunderstanding of needs and purposes, the EA concludes the FAA has a need to evaluate the proposals. Again, a need cannot be a purpose and vice versa. The two are mutually exclusive. The EA must be revised to clearly and concisely state the needs for and purposes of the proposed action.

Following this discussion is an additional discussion about Snohomish County and limited discretion to deny airline request to operate at Paine Field. This lead sentence is unsupported by the following discussion and has little to do with the previously discussed FAA action to evaluate and fund. There is no discussion about the role Snohomish County is playing in this proposed action; other than the fact that Snohomish County owns the airport. There is no indication of what discretion Snohomish County does have. The context of this discussion seems to imply that Snohomish County has no responsibility to set reasonable terms such as explanatory rationale for proposals to operate or to discriminate among potential operators who may have not planned or prepared for their intended operations. Contrary to this implication, the grant assurance quotation about economic nondiscrimination says that Snohomish County will make the airport "available on reasonable terms without unjust discrimination." The grant assurances do not say Snohomish County has no discretion at all.

We do see, however, a situation in which there are a series of connected actions and action proponents that have not been adequately characterized by this EA. The intention to initiate scheduled air service by Allegiant Air and Horizon Air and the response by Paine Field, Snohomish County and FAA to fund and construct a terminal facility will have consequences. One consequence of the proposed evaluations,

1 http://www.painefield.com/airserviceeca.html#EA01, accessed 1 Feb 10
approvals, modifications, funding and construction is an expansion of air operations and services at Paine Field. FAA appears to be the lead federal agency having NEPA responsibility and the proposed action appears to be broader than a simple ministerial action of approving applications. Snohomish County appears to be a cooperating agency. There must be some established operating organization between Snohomish County and Paine Field defining separation of responsibilities. This information needs to be presented in a clear and concise manner in this EA.

4 What other action(s) would meet the same need? (40 CFR 1502.14, 1508.25(b))

Yes, as noted in the EA, the "heart" of the NEPA process is the comparison and consideration of alternatives. Reasonable alternatives are those that meet the purpose and need, and achieve objectives. The Preferred Alternative is the option that is preferable to the decision maker. Chapter 2 should summarize the impacts assessed in Chapters 3, 4, etc. and compare the impacts caused by the alternatives.

Unfortunately, the confusion about need, purpose and action proponent and lack of understanding about discretionary authority in the previous section lead to an arbitrary set of alternatives with a capricious conclusion of reasonableness. The EA lists four action alternatives in addition to the no action alternative; one, allowance of the air service expansion is preferred, two involving other airports and aircraft are noted as not within purpose and need and the fourth is not reasonable because it’s expensive.

- No Action Alternative. Page B.2 Carriers "[continue] to serve the region at their existing operational locations."
- The Preferred Alternative (Proposed Action or the Project). The proposed actions consist of: amending the operations specifications for Horizon Air and Allegiant Air; amending the Part 139 operating certificate for Paine Field; and providing for federal funding for the modular terminal building.
- Use of other airports. Instead of operating at Paine Field, the airlines operate at another airport in the region. (Identified as not within purpose and need pB.5 – but, it is embodied in the no action alternative if "other" airport includes Seatac and Bellingham.)
- Use of Other Aircraft. Instead of operating the Q400 and the MD83 (or CRJ700 substitute) aircraft, the operators use other aircraft. (Identified as not within purpose and need pB.5)
- Construct a Large Permanent Terminal as Shown on the ALP. Construct a new passenger terminal the size and location as shown on the Airport Layout Plan (ALP). (Identified as not reasonable pB.5)

The EA should be revised to present a rigorous range of alternatives, or the scope of the proposed action must be clarified to avoid capricious exclusion of alternatives. The following alternatives are suggested for inclusion in this EA:

- Variation in proposed number of operations to meet specified air operations and airfield safety standards or regional air traffic
- Variation in the proposed number of operations by air carrier falling within the carrier’s rationale for expansion

This EA section refers to federal regulations for EISs to describe the function of the Alternatives section. The regulation cited is 40 CFR 1502.14, Alternatives including the proposed action. There are other requirements in this CFR section that are not met with this EA.

The EA does not summarize the environmental effects from the environmental consequences section to help decision makers evaluate the proposal. As required by 40 CFR 1502.14(b) the EA does not devote substantial treatment to each alternative considered in detail so that reviewers may evaluate their comparative merits. The EA may not require a comparison of environmental alternative effects, but it does require substantial treatment of the analyzed alternatives so that reviewers can evaluate the merits. This is a good place to summarize the reasons why the identified effects of the proposed action are not significant and why the analysis supports a FONSI. However, we cannot tell with the noted shortcomings of the proposed action, purpose and need and action proponent. Also, see further comments on each environmental resource section below.
To reasonably present an analysis of effect significance, the EA must be revised to address the items included in the CEQ’s definition of significantly at 40 CFR 1508.27. Table 1 summarizes the requirement and how the EA should address the requirement.

Table 1 – Standards for determining significance

<table>
<thead>
<tr>
<th>Reference/Topic</th>
<th>Standard</th>
<th>Conclusion from EA</th>
</tr>
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<tbody>
<tr>
<td>40 CFR 1508.27(b)</td>
<td>Agency needs to know</td>
<td>EA provides this information</td>
</tr>
<tr>
<td>(1) Environmental effects</td>
<td>Are there beneficial or adverse effects on land, air, or water</td>
<td>No “significant” impact</td>
</tr>
<tr>
<td>(2) Public health or safety</td>
<td>Are there effects on public health or safety</td>
<td>No “significant” impact</td>
</tr>
<tr>
<td>(3) Unique characteristics of the area</td>
<td>Are there effects on historic or cultural resources, park lands, prime farmlands, wetlands, wild and scenic rivers, ecologically critical areas, etc.</td>
<td>No “significant” impact</td>
</tr>
<tr>
<td>(4) Controversy</td>
<td>Are the effects controversial</td>
<td>No “high” controversy</td>
</tr>
<tr>
<td>(5) Uncertainty</td>
<td>Are the effects uncertain, or do they involve unique or unknown risk</td>
<td>None</td>
</tr>
<tr>
<td>(6) Precedent</td>
<td>Will the action establish a precedent for future actions with significant effect; will the action represent a decision in principle about a future consideration</td>
<td>None</td>
</tr>
<tr>
<td>(7) Cumulative impact</td>
<td>Is the action related to other actions with individually insignificant impact but cumulatively significant impact</td>
<td>None</td>
</tr>
<tr>
<td>(8) Properties on or eligible for the National Register of Historic Places; significant resources</td>
<td>Will the action adversely affect districts, sites, highways, structures, or objects listed in or eligible for listing in the National Register of Historic Places; will the action cause the loss or destruction of significant scientific, cultural, or historical resources</td>
<td>No “significant” impact</td>
</tr>
<tr>
<td>(9) Endangered or threatened species; critical habitat</td>
<td>Will the action affect a listed species or critical habitat</td>
<td>None on listed species or critical habitat, or, if may affect, not likely to adversely affect</td>
</tr>
<tr>
<td>(10) Legal requirements for environmental protection</td>
<td>Will the action threaten a violation of Federal, State, or local law or requirement imposed for the protection of the environment</td>
<td>No “significant” impact</td>
</tr>
</tbody>
</table>

The EA appears to say that some alternatives are not discussed because they are not within the discretionary jurisdiction of the federal agency. Jurisdictional boundaries are not the delimiter of alternatives as clearly explained in 40 CFR 1502.14(c). Purposes and needs are the delimiters of the range of alternatives. See the Council on Environmental Quality (CEQ) Forty Most Asked Questions Concerning CEQ’s NEPA Regulations. Question 1 Range of Alternatives.² This EA has not clearly established purposes and needs, thus the provided range of alternatives is unjustly constrained.

The EA does not mention mitigation measures in this section. 40 CFR 1502.14(f) requires the inclusion of appropriate mitigation measures not already included in the proposed action or alternatives. For example, the traffic mitigation fees referenced in the traffic impact sections would fall within this definition.

The proposed number of operations are provided in the EA in Table B.2 under the no action and proposed action scenarios. No other environmental information is summarized here. This table includes a typographical error that should be corrected: Air Taxi under proposed action should be 2,883 rather than 2,833. Also, enplanement is jargon that needs to be replaced with another more generally understood term. Finally, the impact analysis should clarify why only enplanements and not deplanements are considered in the impact analysis. Has the impact analysis inadvertently halved the impact?

5 What factors will be used when making the decision between alternatives? (40 CFR 1502.23)

A discussion of decision factors relating the NEPA scope to the range of alternatives considered in the environmental analysis is usually needed for clarification. Also, purpose may be used as a selection criterion, making clear in Chapter 2 how it has been applied.

The EA should be revised to include a clear and concise discussion about the decisions to be made by the lead federal agency and cooperating agencies. There is some discussion about what is not required of the agency. However, the discretion of the agency is not discussed in any detail.

6 What would it mean not to meet the need? 1508.25(b)(1)

The No Action alternative describes the scenario of not meeting the need with the Preferred Alternative or [Action] Alternative. Many times, but not always, the No Action Alternative will be equivalent to the existing conditions.

The No Action alternative of continuing service as before without any change implies that a potential range of alternatives would include an expansion of service at existing airports and, perhaps, some variation on that theme. When the NEPA scope is established considering the three types of actions, alternatives and impacts, we see a requirement to consider additional alternatives. The consideration of connected actions demands that airport expansion is considered as part of the action scope. Expansion would then be considered against a backdrop of no expansion and/or expansion elsewhere and/or expansion in variation of numbers. This type of alternative range meets the needs ... or, purposes...of evaluating proposals for new scheduled operations against air safety, air operations and use of airways.

The EA must be revised to fill in the missing logical explanation about the change from existing conditions to the proposed action. The no action alternative is defined as conditions in the future with the two applicant air carriers operating with "existing operational locations." This no action alternative suggests that action alternatives include operating at other operational locations or operating with a varying level of service at existing, proposed or other locations. We are missing a clear and concise statement of need and purpose, so we cannot identify a reasonable range of such alternatives and the no action appears "out of sync" with the preferred action.

7 What are the effects of the proposed action and alternative actions? (40 CFR 1508.25(c), 1508.8, 1502.16)

This information makes up the bulk of the Environmental Analysis and consists of a determination of level of effect. Chapter 2 should summarize the impacts assessed in Chapters 3, 4, etc. and compare the impacts caused by the alternatives. During preliminary/internal scoping, identify major environmental issues expected to drive analysis and potential controversy.

The Affected Environment section should be revised to use the airport influence area as the sole definition of affected area. As written, the airport influence area is used for noise and traffic; whereas for other resources the construction site is used as a definition of affected area. This conflicting use of
affected area does not work well with some resources such as coastal resources or aquatic resources that would fall within the airport influence area, but that would not be found at the construction site. The result of expanding operations could cause an indirect environmental effect on endangered salmon if there is a salmon stream found within the airport influence area. However, the EA fails to recognize this potential.

The preliminary text indicates that farmlands and wild and scenic rivers are excluded from further analysis and provides rationale. There is no further discussion about potentially significant issues, failing to meet the general NEPA requirement of focusing on issues relevant to decisions to be made and presenting an analytic rather than encyclopedic analysis.

This EA fails on several occasions to present support for the conclusions of non significance. Frequently, the relative terms “minor,” “slight,” etc. are used as a basis for conclusion of significance. There is very little quantitative analysis included in the EA. Thus, a reasonable person may disagree that the level of effect characterized as “slight” by the EA without quantitative support may exceed a threshold of significance. That is, the EA is not credible.

Table 2, below, summarizes in a straightforward manner the impact analysis in the EA including environmental resource, the level of effect and evidence for concluding the level of effect is not significant. In some cases, there is no or zero effect. Zero effect is clearly not significant. However, the effect may be zero only when shown with fact that it indeed will be zero. When the effect changes in any way, the EA has a responsibility to explain whether the effect is significant.

Each of the cells in Table 2 should present information for each potentially affected environmental resource row. The EA should be revised to present conclusions and supporting evidence for those conclusions for every potentially affected environmental resource. Where a resource is not potentially affected, this should be clearly explained. The EA should also be revised to address the specific comments the fifth column of Table 2.

Table 3 presents itemized comments on the EA. The EA authors should address and respond to these comments.

8 Are there ways to mitigate the adverse effects? (40 CFR 1508.25(b)(3), 1508.20, 1508.2(e))

If “mitigation” is part of the proposal, or part of an alternative, it is already accounted for in the proposal or alternative. Only “mitigation” that is optional above and beyond the proposal or alternative is to be considered here. "Mitigation" can be considered an "alternative" that must be considered apart from the proposal or other alternatives.

The EA fails to clearly discuss mitigation. The traffic section discusses mitigation fees, but does not explain how this works or who pays these fees. The EA should be revised to clarify this and present the mitigation requirement as an important commitment for decision maker review and consideration.

9 What monitoring is necessary that is not included in the proposed action or alternative(s) action? (40 CFR 1505.3, 1505.2(c))

At the time of decision, a monitoring and enforcement program must be considered where applicable for any mitigation. Agencies may provide for monitoring to assure that their decisions are carried out and should do so in important cases. The EA does not discuss monitoring.
Table 2. Conclusions of non-significance, level of effect and supporting evidence (a.k.a reasons) found in the EA for Amendment to the Operations Specifications for Air Carrier Operations, Amendment to a FAR Part 139 Certificate, and Modification of the Terminal Building Payne Field, Mukilteo, WA, Public Review Draft. December 2009

<table>
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<tr>
<th>Environmental element</th>
<th>Ecological Breakdown</th>
<th>Corresponding EA Section</th>
<th>Level of effect</th>
<th>Supporting evidence</th>
<th>Comments</th>
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</table>
| Terrestrial biology           | Section Fish, Wildlife and Plants | Page D.13 No significant adverse effect  
- No effect on fish, wildlife or plants  
- Will not affect nearby open area | Page D.13  
- Slight increase in impervious area | No analysis, no supporting evidence for conclusions  
An environmental effect (increase in impervious area) is inappropriately used as supporting evidence. | No analysis, no supporting evidence for conclusions  
An environmental effect (increase in impervious area) is inappropriately used as supporting evidence. |
| Avian biology                 | Section Fish, Wildlife and Plants | |                                                                                      | No conclusion, no analysis  
Term "bird" mentioned only once in document – Page C.6  
Snohomish Comprehensive plan discourages land use near airport that attracts birds. Letter from NRCS identifies new construction at airport as potential bird attractant.  
Issues not discussed:  
- Migratory Bird Treaty Act  
- Bird aircraft strike hazards | No conclusion, no analysis  
Term "bird" mentioned only once in document – Page C.6  
Snohomish Comprehensive plan discourages land use near airport that attracts birds. Letter from NRCS identifies new construction at airport as potential bird attractant.  
Issues not discussed:  
- Migratory Bird Treaty Act  
- Bird aircraft strike hazards |
| Aquatic biology               | Section Fish, Wildlife and Plants | |                                                                                      | No conclusion, no analysis  
See runoff in WQ pD.33 and wetland discussion in Wetlands pD.34 | No conclusion, no analysis  
See runoff in WQ pD.33 and wetland discussion in Wetlands pD.34 |
| Threatened and Endangered     | Section Fish, Wildlife and Plants | Page D.13  
- No protected species are known to be permanent residents of the airport  
- No critical habitat or state listed priority habitats occur on the airport | | No conclusion with irrelevant rationale. Threshold for ESA is "effect." Threshold for EA/FONSI is no significant effect. State listed species not applicable to federal action. Critical habitat is associated with a listed species. Other potentially |

8
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| Wetlands              | Wetlands             | Page D.34                 | Will not impact wetlands or wetland mitigation bank. | - The closest wetland to the proposed terminal expansion is Wetland A  
- Critical Areas Study identifies no wetlands that would be impacted | Critical areas study is not provided or cited and data is not summarized.  
Master Drainage Plan not provided or cited and data is not summarized.  
Wetland banks named, but with no further reference |
| Air Quality           | Air Quality          | D.2                       | Would be de minimis not require a conformity determination  
- increase emissions relative to the No Action | - Minimized with Snohomish County BMPs which further identify industry standard BMPs  
- Table D.6 "shows that the project-related emissions would be below the Clean Air Act defined de-minimis threshold, and thus the planned actions do not require a conformity determination." | No analysis in the EA.  
Actually, Table D.6 just says "yes" or "no" as to whether the emissions are below de minimis.  
Cites Synergy Consultants, but no reference otherwise (may be in the appendix). |
| Water Quality         | Water Quality        | Page D.33                 | No alt would adversely affect the water quality of surface water resources, stormwater runoff, sanitary wastewater, or groundwater resources | - very small increase in impervious surface 1,000 sf  
- no maintenance  
- no washing  
- use approved de-icing pad  
- infiltration to aquifer (~200ft) considered unlikely | CEQ regulations do not differentiate between adverse and positive impacts. Adverse effect is irrelevant to significance of effect.  
Agree 1000 sf may be insignificant, but no information is provided on capacity of utility system to handle runoff (see below) |
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<th>Level of effect</th>
<th>Supporting evidence</th>
<th>Comments</th>
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| Shorelines            | Coastal Resources    | D.9                      | No action alt will not affect coastal resources | Airport is not located within a shoreline of the state  
County will apply for CZMA Cert from WA Ecology  
State checklist and EA will be sent to Ecology | Location within the shoreline of the state is not a criterion for affecting the coastal zone.  
There is no discussion about effects of proposed action on the coastal zone  
Affected area could include airport influence area which does extend to the shoreline  
What about runoff that may affect freshwater streams that then indirectly affect anadromous fisheries or Puget Sound water quality? |
| Noise                 | Noise and Compatible Land Use | D.18 | 65 DNL remains within airport property  
no anticipated 1.5 DNL noise increases of noise sensitive land uses within the 65 DNL | No conclusion about significance |
| Transportation        | Surface Transportation | D.31 | No action no effect on surface transportation  
Action no intersections will change from acceptable to deficient level of service  
956 daily (212 PM) trips added | Trips added to intersections that will be deficient anyway  
Mitigation through mitigation fees | Interesting appendix with a well done traffic survey. The survey is not summarized in the EA. The RA is unclear how the intersections LOS changes and how the mitigation applies. |
| Sociology             | Socioeconomic Environment, Environmental Justice, Children's Environmental Health and Safety Risks | Page D.29 would not be any significant changes to the socioeconomic environment  
Page D.30 increased number of jobs  
Page D.30 slight | Takes place entirely on airport property  
Does not require any changes or improvements to roads or intersections in the vicinity of the Airport. | Increased jobs and business are not quantified and evaluated as to potential significance. The conclusions of significance are not paralleled with level of effect discussion. |
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<tbody>
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<td></td>
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<td></td>
<td>increase in business</td>
<td>No relocations are required, No disproportionate impacts to children, or low income or minority population groups are anticipated.</td>
<td></td>
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<td>Health and Safety</td>
<td>Socioeconomic Environment, Environmental Justice, Children's Environmental Health and Safety Risks</td>
<td>Page D. 29 would not be any significant changes to the socioeconomic environment</td>
<td>Page D. 29 would not be any significant changes to the socioeconomic environment</td>
<td>entirely on airport property, does not require any changes or improvements to roads or intersections in the vicinity of the Airport.</td>
<td>The “socioeconomic environment” is undefined. TOC fails to include entire section title in affected environment portion.</td>
</tr>
<tr>
<td>Schools and Child Protection</td>
<td>Socioeconomic Environment, Environmental Justice, Children's Environmental Health and Safety Risks</td>
<td>Page D. 29 would not be any significant changes to the socioeconomic environment</td>
<td>Page D. 29 would not be any significant changes to the socioeconomic environment</td>
<td>No schools within close proximity, Well outside 65 DNL, No property acquisition, not expected to significantly affect products or substances that a child is likely to come in contact with or ingest, such as air, food, drinking water, recreational waters or soil.</td>
<td>See HM, Effect on schools not stated. Stating an effect is not significant does not constitute an assessment of level of effect.</td>
</tr>
<tr>
<td>Environmental Justice</td>
<td>Socioeconomic Environment, Environmental Justice, Children's Environmental Health and Safety Risks</td>
<td>Page D.30 no significant negative (or otherwise disproportionate) impacts to any special population groups</td>
<td>Page D.30 no significant negative (or otherwise disproportionate) impacts to any special population groups</td>
<td>No land acquisition, No significant changes and no road improvements, 65 DNL remains on airport property</td>
<td>Affected area section indicates “no known special population groups within the project area.” The use of the term “no known” indicates lack of information. CEQ regulations provide specific steps to take in response to incomplete or unavailable information. (40 CFR 1502.22)</td>
</tr>
<tr>
<td>Economy</td>
<td></td>
<td></td>
<td>D.30 not significantly change the socioeconomic environment</td>
<td>No homes or businesses on airport property, No property acquisition</td>
<td>The EA identifies an Additional 27 employees Page B.7 “This demand would generate the need for six to ten additional airline employees, several which may be contracted from existing Fixed</td>
</tr>
<tr>
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<td></td>
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<td>and along Airport Road that could be attributed to the provision of commercial service.</td>
<td>Base Operators. An additional seventeen employees; including TSA employees, security, rental car and maintenance workers are anticipated. Employees would also use the existing on-airport parking. &quot; Page D.15 refers to “additional airport employees” re waste generation.</td>
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<td></td>
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<td></td>
<td>• D.30 slight increase in business</td>
<td>Why is this change not significant?</td>
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<td></td>
<td>• Increase in vehicular traffic</td>
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<td></td>
<td>• No major shifts in public demand or economic demand</td>
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<td>• D.36, Cumulative section “acceleration in economic growth is expected, however, cumulative socioeconomic impacts as a result of the planned developments are expected to be positive.</td>
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<tr>
<td>??</td>
<td>Secondary (Induced)</td>
<td></td>
<td></td>
<td>Secondar impacts are typically considered as “indirect” impacts within each impact section.</td>
<td></td>
</tr>
<tr>
<td>Land Use</td>
<td>Compatible Land Uses</td>
<td></td>
<td>• Page D.10 no anticipated impacts or changes</td>
<td>Conclusion not supported (CZMA included in land use).</td>
<td></td>
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<td></td>
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<td></td>
<td>• 65 DNL remains on airport property – see noise section</td>
<td>Page D.9 “…development on the Airport is not subject to the requirement for a shoreline substantial development permit (see email from Tom Barnett, Principal Economic Development Officer for Snohomish County in Appendix C.)”</td>
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The substantial development
<table>
<thead>
<tr>
<th>Environmental element</th>
<th>Ecological Breakdown</th>
<th>Corresponding EA Section</th>
<th>Level of effect</th>
<th>Supporting evidence</th>
<th>Comments</th>
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</thead>
</table>
| Utilities             | Natural Resources, Energy Supply and Sustainable Design | Page D.17 No significant impacts to natural resources or energy supply  
- Minor increase in fuel consumption for construction  
- Additional heating and cooling  
- Increase in fuel for aircraft and GSE  
- Increase in VMT 4.1M in 2011 and 5.2M in 2016 | • Not expected to be significant  
• Not change or alter energy use | Conclusion not supported.  
Estimated VMT gallons for 2011 at 4.2 million gallons with a rate of use of 25 mpg are about $492,000 for 164,000 gallons of gas.  
No other data shown.  
Acknowledged changes in energy and fuel use are not analyzed for significance. |
| HM/HW                 | Hazardous Materials and Wastes | Page D.14 no significant impacts regarding hazardous waste, pollution prevention or solid waste.  
• Proper airfield procedures  
• A plan is in place to reduce likelihood of spill | Conclusion not supported.  
How do existing procedures protect from potential spills under |
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<th>Environmental element</th>
<th>Ecological Breakdown</th>
<th>Corresponding EA Section</th>
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<th>Supporting evidence</th>
<th>Comments</th>
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<td></td>
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<td></td>
<td>Framing</td>
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<td>Case Study</td>
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<td>Page D.15</td>
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<td></td>
<td>FAA determined no affect (sic) historical, architectural, archeological or cultural resources (Appendix check may not have actually said no effect)</td>
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<td></td>
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<td>Response plan</td>
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<td>NPDES permit in place</td>
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<td>No demolition, so minimal and not expected to exceed capacity of local disposal facilities</td>
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<td>Increased lighting at new terminal</td>
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<td></td>
<td>Existing “mostly industrial land use”</td>
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<td>Changes in keeping with existing visual setting</td>
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<td>Aircraft would not be substantially distinguishable from other types of aircraft</td>
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<td></td>
<td>No eligible properties</td>
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<td>Here, FAA has taken the responsibility for action as the federal lead agency.</td>
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<td>The FAA has consulted, with the Washington Department of Archaeology and Historic Preservation (DAHP) pursuant to Section 106 of the NHPA. They have also consulted with the Stillaquamish Reservation, Sauk-Suiattle Tribal Council, and the Tulalip Reservation in accordance with the Executive Order on Tribal Consultation. The DAHP has concurred with the FAA determination of no historic properties affected and no responses have been received from the tribes to date. See Appendix J and N.</td>
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<tr>
<td>Environmental element</td>
<td>Ecological Breakdown</td>
<td>Corresponding EA Section</td>
<td>Level of effect</td>
<td>Supporting evidence</td>
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|                       |                      |                           | D.36                                                                           | • Some acceleration in economic growth is expected  
• Roadway improvements and area developments will not combine to create a significant impact  
• Not cumulatively or significantly increase noise in the area or impact areas of historic, biotic, hydrological, or other environmental significance.  
• Therefore, neither the No Action nor the Preferred Alternative would result in any significant adverse impacts at or in the vicinity of the Snohomish County Airport/Paine Field when considered cumulatively with other past, present or reasonably foreseeable projects | (see also Socio) Cumulative impact analysis falls short of the CEQ guidance. A listing of actions is not an analysis.  
First use of TSA rules without preliminary explanation.  
Expectation of positive impacts is not evidence of non significance. CEQ regulations make no distinction between positive and negative effects. |
|                       |                      |                           | D.14                                                                           | • Not expected to adversely impact floodplains  
• FEMA outside 500-year floodplain                                                                 | This is enough to exclude this section from discussion as was scenic rivers.                             |
|                       | Floodplains          |                           | D.10                                                                           | • No action – no permanent construction  
• Less than 90 days  
• Compliance with FAA construction guidance                                                                 | New impact section on page D.10 not reflected in existing environment                                     |
<table>
<thead>
<tr>
<th>Environmental element</th>
<th>Ecological Breakdown</th>
<th>Corresponding EA Section</th>
<th>Level of effect</th>
<th>Supporting evidence</th>
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<tr>
<td></td>
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<td>impacts</td>
<td>Final plans not developed, but temporary and not exceed the thresholds of significance, traffic patterns altered, any others minimized by BMPs.</td>
<td>Cannot conclude significance if final plans are not developed or specific mitigation commitments are made in the EA. That is, one may not conclude non significance with unresolved scope issues.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>DOT Act 4(f)</td>
<td>D.12 No effect action/no action</td>
<td>No known 4(f) resources in the project area, the 65 DNL noise contour does not encompass Kasch Park or Walter E. Hall Park</td>
<td>State Recreation and Conservation Office (RCO) is reviewing EA. Will they have any comments? One may not conclude non significance with unresolved scope issues.</td>
</tr>
<tr>
<td>Emergency Services</td>
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<td>Greenhouse Gasses</td>
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</table>
Table 3—Itemized comments on the EA for Amendment to the Operations Specifications for Air Carrier Operations, Amendment to a FAR Part 139 Certificate, and Modification of the Terminal Building. Paine Field, Mukilteo, WA, Public Review Draft. December 2009

<table>
<thead>
<tr>
<th>ID</th>
<th>Location</th>
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<th>Response</th>
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<tbody>
<tr>
<td>1</td>
<td>Cover pages</td>
<td>No indication of the lead agency, federal official or federal contact person. Implies lack of FAA involvement. See Order 1051 Chapter 4 EA’s. See also 1051 405a in which the cover page is specified and no reference to federal contact person is mentioned.</td>
<td></td>
</tr>
<tr>
<td>2</td>
<td>Cover</td>
<td>No indication of commenting address/location.</td>
<td></td>
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</table>
| 3  | Page A.1, Introduction | "This Environmental Assessment (EA) was prepared to comply with the requirement of the National Environmental Policy Act of 1969 (NEPA) for all federal actions associated with the scheduled commercial passenger service."

Statement establishes that all federal actions are included in the scope of this proposed action/NEPA document. Association with the "scheduled commercial passenger service" is not clear. As written, this implies that there is a passenger service that is already set in motion and scheduled, thus potentially an irretrievable action causing environmental effect. Also potentially biasing FAA decision making on the "allowance" of commercial passenger service as indicated in the proposed action statements (see NEPA specific comments above). | |
<p>| 4  | Purpose and Need | P&amp;N unclear, especially with regard to allowance of scheduled commercial air traffic and construction of the modular facility. | |
|    |          | See 1051 405c: &quot;This discussion identifies the problem facing the proponent (that is, the need for an action), the purpose of the action (that is, the proposed solution to the problem), and the proposed timeframe for implementing the action. The purpose and need for the proposed action must be clearly justified and stated in terms that are understandable to individuals who are not familiar with aviation or commercial aerospace activities. To provide context while keeping this section of the EA brief, FAA may incorporate any supporting data, inventories, assessments, analyses, or studies by reference. | |
| 5  | Purpose and Need | If &quot;evaluation&quot; only is purpose, then why consider noise impacts? Thus, by considering noise impacts, the action includes increase in air traffic frequency, type and subsequent noise. | |
| 6  | Range of Alternatives page B.1 | In for a dime, in for a dollar: Citing EIS regulation at 1502.14…Chapter 2 is the heart &quot;The Council on Environmental Quality (CEQ) Regulations1 state that the alternatives section is the heart of the environmental document. | |</p>
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<th>Location</th>
<th>Comment</th>
<th>Response</th>
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<td></td>
<td></td>
<td>This regulation applies to EIS's and this is an EA. That's not a problem, but if you're making a big deal of complying with something in the regulations in excess of the EA requirements, then you've broached the issue and need to carry compliance to completion within context. This citation would better be the NEPA Law [Sect 102(E)] via EA definition at 1508.9. The context of the EA paragraph suggests that they're fully disclosing the NEPA scope. Scope is defined at 1508.25, and includes the full range of Actions, Alternatives and Impacts. Actions and alternatives are discussed in Chapter 2 while impacts are discussed in chapter 3/4. I'd say this section is short on actions and alternatives. Also, it does not compare alternatives other than the no action with the proposed. While not required of an EA, going into EIS requirements begs the question. See also 1507.2(d) regarding environmental alternatives regarding unresolved conflicts concerning use of available resources. Paragraph also quotes from 1502.14(a) and, later, complies with 1502.14(d) no action and (e) id preferred, but may not hit these other 1502.14 sections: (b) Devote substantial treatment to each alternative considered in detail including the proposed action so that reviewers may evaluate their comparative merits. (c) Include reasonable alternatives not within the jurisdiction of the lead agency. (f) Include appropriate mitigation measures not already included in the proposed action or alternatives.</td>
<td></td>
</tr>
<tr>
<td>7</td>
<td>Page B.2</td>
<td>No citation, no reference. Reviewers need to see this initial review. &quot;An initial review of the broad range of alternatives was conducted through these categories to identify those alternatives that are considered reasonable.&quot;</td>
<td></td>
</tr>
<tr>
<td>8</td>
<td>Page B.2</td>
<td>Inaccurate description for no action.</td>
<td></td>
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</table>
"The No Action, when compared with another alternative, enables the identification of the probable impact..."

Not true. No action allows a determination of difference between impacts of no action vs impacts of proposed action.

**Concern...action/no action out of sync**

If no action is to continue regional service of the air carriers at existing locations, then action is to establish a modified or changed regional service.

On the other hand if the action is to issue, issue, approve, approve, then the no action is don't issue, don't issue, don't approve, don't approve.

If this means continuing the existing, then we could consider the modification resulting from the issue, issue, approve, approve action.

**Incorrect total for 2016 total operations. I calculate 162,468 vice 162,418.**

**How was the total enplanements calculated? Hirsch memorandum, Appendix K, is cited on table, but no information on basis. I calculate different numbers based on number of flights and estimated loading.**

**Change "affects" to "effects." Run-on sentence, revise.**

**The term "enplanement" is jargon. Although parenthetical explanation is given in this paragraph at the end, it does not clearly indicate how many people are moving to and from the airport. Clarify.**

If it means to board an airplane, then that's only half of the function that should be analyzed. Both "enplanements" and "deplanements" should be analyzed. That is, people departing and arriving at the Paine Field terminal. This change would affect the entire impact analysis.

The carrier will not "dead head" aircraft into Paine Field.

**Other airports...if airport selection is unrestricted and issuance of licenses is based only on safety, then why conduct traffic and noise analysis? Solely on basis of safety? How/where do environmental issues come into play?**

Use of other airports in no action...only back to unchanged condition.
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<td></td>
<td></td>
<td>How about variation of the mix...say AA only, HA only? Say, reduction of number of flights?</td>
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<tr>
<td>13</td>
<td>pB.5</td>
<td>All alternatives are either not within P&amp;N or unreasonable. There must be some alternative that is within P&amp;N. There is no discussion about how there are no unresolved conflicting use of environmental resources. Alternative build a large terminal is confusing. Aren’t a certain number of ops associated with this terminal? Of course, it’s not a good idea to just build a large terminal. But, does this EA disagree with the Airport planning that envisioned an increase in enplanements? Don’t get it.</td>
<td></td>
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<tr>
<td>14</td>
<td>pB.4 and B.6</td>
<td>Satisfaction of environmental issues is indicated here as a criterion with satisfaction of safety and operational issues. Is this satisfaction a criterion of purpose? Where do we find this criterion imposed? Are these criteria purpose criteria? Not clear. How do safety, operations and environmental issues enter into the alternatives? If these are purpose factors, then meeting safety criteria in different ways, for example, may offer variations in environmental effects. However, we’re not apprised of safety and operational factors or standards.</td>
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<tr>
<td>15</td>
<td>General</td>
<td>Suggested alternatives - Service level variation from the proposed (even though not within jurisdiction, it does meet purpose and need and is provided for in regulations (see comment 6 re 1502.14(c))). This could be either a variation in air ops or variation in carrier (e.g. Horizon alone and/or Allegiant alone) - ? see comment 16 – why increase occurs only at PAE Increase at SEA Increase at BLI Both SEA - BLI</td>
<td></td>
</tr>
<tr>
<td>16</td>
<td>B.6</td>
<td>Preferred described again. See spreadsheet where numbers were checked.</td>
<td></td>
</tr>
<tr>
<td>17</td>
<td>General</td>
<td>Deregulation means the feds do not regulate which airport a carrier</td>
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<td>ID</td>
<td>Location</td>
<td>Comment</td>
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<td>uses. Thus, the action of a carrier deciding to use a particular public airfield is not regulated. If FAA takes over all environmental review of this action, then FAA must also take on the regulatory power of whether or not to expand facilities and ops at this particular field at this time. If it were a private entity taking on this action, then the SEPA would be triggered. But, here FAA takes it all. There's a lost portion of how environmental regulations play into the decision to expand operations at Paine Field.</td>
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<tr>
<td>18</td>
<td>General</td>
<td>Proposed action is not structured properly. Based on needs, the proposed action would be review and approval of cert mods and funding of fac expansion. Cert mods, however, lead to ops and fac expansions. Also, EA analyzes noise changes from ops changes. However, the proposed action does not include ops expansion. Proposed action is actually expanded facilities and supporting ops. Alts to this would address variations in ops/fac sizes, configurations, locations (note, that the airfield planning documentation has been identified as premature (essentially bogus) and, thus, not worthy of analysis. If the airfield issued a land use plan, they cannot now turn around and say it's bogus and unreasonable. But, PAE will continue to show it as an expansion site. Can't have it both ways!</td>
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<tr>
<td>19</td>
<td>Question</td>
<td>Any change to flight path into/out of airport? Who does ATC?</td>
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<td>20</td>
<td></td>
<td>The deregulation says FAA cannot use airport regulations to regulate the carrier, it does not say it cannot regulate at all. NEPA offers additional considerations that may result in a regulation or temperance of action. See the law for this philosophy. See the regulations for how to do this. It's a connected action to increase ops/facs at airport.</td>
<td></td>
</tr>
<tr>
<td>21</td>
<td>pA.1</td>
<td>Spell out FAR...confusion with federal acquisition regulations. Also, include CFR citation. What does this amendment say, exactly? Not reported in EA.</td>
<td></td>
</tr>
<tr>
<td>22</td>
<td>pA.2</td>
<td>Maybe not justification, but rationale for properly and adequately equipped would figure into approval, if the cert as quoted 2) specify the places where the carrier goes. Are there any prohibitions for good sense regional air planning?</td>
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<tr>
<td></td>
<td>C.3</td>
<td>Term &quot;project area&quot; is used here and throughout. It is finally defined at page c.24 and may be in conflict with Airport Influence Area (AIA) Here the term relates to the exclusion of farmland and wild rivers C.12 section 4(f)</td>
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<td>ID</td>
<td>Location</td>
<td>Comment</td>
<td>Response</td>
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<td>C.12 critical habitat &quot;Paine Open Space&quot; C.14 floodplain C.19 EJ C.20 schools C.24 intro defines project area as actual construction footprint D.12 f(f) D.13 critical habitat D.14 floodplain D.30 childrens D.37 cumulative</td>
<td>AIA – Snohomish comp plan defines as potential land use interaction area in Land use and zoning See also traffic where the phrase is used to define interlocal traffic agreements intersection with action</td>
</tr>
<tr>
<td>23</td>
<td>C.6</td>
<td>Airport area of influence goes to Puget Sound shoreline. Does this trigger SMA or cause the action to potentially affect the shoreline as defined within 200 feet of the OWM? Land uses are influenced by or influence the airport ops. Discourage land uses that attract birds, create visual hazards, or otherwise conflict with air traffic. Thus, requiring full planning and alternatives rationale per 4(f)</td>
<td></td>
</tr>
<tr>
<td>24</td>
<td>C.9</td>
<td>So, what does GMA have to do with a federal action? What’s the trigger, what is the consequence?</td>
<td></td>
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<tr>
<td>25</td>
<td>C.10</td>
<td>Land use maps do not provide coverage over the entire area of influence. C1 is different scale than C3, C4 and C5 -</td>
<td></td>
</tr>
<tr>
<td>26</td>
<td>C.12</td>
<td>Section 4(f). Include shorelines of Puget Sound to the west as they are included in the airport influence area. Thus, triggering full alternatives analysis.</td>
<td></td>
</tr>
<tr>
<td>27</td>
<td>C.12</td>
<td>ESA requires federal agencies to examine &quot;effect&quot; not &quot;adverse effect&quot; on listed species… and consult with resource agencies.</td>
<td></td>
</tr>
<tr>
<td>28</td>
<td>C.12</td>
<td>USFWS/NOAA definitions of endangered and threatened are of no consequence. What is of consequence is what the action proponent do in compliance with ESA. 1 identify listed species, 2 determine level of effect, 3 consult and demonstrate compliance.</td>
<td></td>
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<tr>
<td>29</td>
<td>C.12</td>
<td>Species of concern are not of concern to this federal action unless FAA regulations indicate they are.</td>
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<tr>
<td>30</td>
<td>C.12</td>
<td>TIE section only reports USFWS onsite observations of birds; does not relate potential of presence nor the marine species.</td>
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<tr>
<td></td>
<td>C.12</td>
<td>Critical habitat is in the T/E section, but used in reference to &quot;Paine</td>
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<td>Location</td>
<td>Comment</td>
<td>Response</td>
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<tr>
<td>31</td>
<td>C.15</td>
<td>Check 106 verbiage requirements</td>
<td></td>
</tr>
<tr>
<td>32</td>
<td>C.15</td>
<td>Historical review did not find any &quot;historic&quot; properties on airport property...a review of &quot;49&quot; listed properties was mentioned but not provided as a citation...not supported</td>
<td></td>
</tr>
<tr>
<td>33</td>
<td>General</td>
<td>Hours of operations not mentioned</td>
<td></td>
</tr>
<tr>
<td>34</td>
<td>General</td>
<td>Flight patterns not mentioned</td>
<td></td>
</tr>
<tr>
<td>35</td>
<td>C.19</td>
<td>Review of population data in passive voice without citation. Not known who, what, when, how why...unsupported conclusion of no known special population groups. Existing conditions are not capable of identify disproportionate aggregation of special group</td>
<td></td>
</tr>
<tr>
<td>36</td>
<td>C.20</td>
<td>The phrase &quot;project area&quot; is used with varying degree of encompassment. Check this throughout.</td>
<td></td>
</tr>
<tr>
<td>37</td>
<td>C.20</td>
<td>Points to a more comprehensive inventory of roads in a Snohomish document in an appendix, but does not say how that affects the existing conditions or this EA.</td>
<td></td>
</tr>
<tr>
<td>38</td>
<td>C.21</td>
<td>Dominant water feature is Pacific Ocean and Puget Sound. So the implied area of effect extends here to the Pacific Ocean. See other comments about SMA and shorelines and alternatives page c.12</td>
<td></td>
</tr>
<tr>
<td>39</td>
<td>C.23</td>
<td>Wetland compensation banks mentioned without citation.</td>
<td></td>
</tr>
<tr>
<td>40</td>
<td>D.1</td>
<td>Off airport related impacts included at random...no rationale again, passive voice &quot;it is recognized&quot;</td>
<td></td>
</tr>
<tr>
<td>41</td>
<td>D.2</td>
<td>Table D.1 footnote in conflict with ops data indicating commercial air traffic. This may reflect differently in air quality calcs. Surface travel, VMT is most certainly affected here. People arriving to depart, arriving to pickup arrivals, workers.</td>
<td></td>
</tr>
<tr>
<td>42</td>
<td>D.5</td>
<td>Table D.5 shows zero for VMT. Disagree; should include VMT as there are existing and new vehicles associated with existing ops and proposed ops. Unrealistic to leave as is.</td>
<td></td>
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<tr>
<td>43</td>
<td>D</td>
<td>Section apparently uses &quot;initiation of commercial air service&quot; as the action. However, table B.1 shows existing ops include air carrier and air taxi. Are these operations non-commercial?</td>
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<tr>
<td>44</td>
<td>B.3</td>
<td>No characterization of existing air operations at Paine Field. Only table B.1 that shows number of ops. Need information on type of aircraft. FAA needs to know what's going on now and how that might change with the new ops. Not sure if the change to be analyzed in the introduction of scheduled commercial air traffic or just commercial air</td>
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<td></td>
<td>traffic. Air quality effects analysis depends on this. Also noise impact analysis depends on this.</td>
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</table>
| D.3 |          | APU used in table D.1 undefined and contributory to air impacts  
D.7 APU contributory to emissions                                                                                                           |                                                                                               |
| D.6 |          | GSE spell out first use. GSE is noted as something that the additional air ops would require. However, what/how much has not been established in section C.  
D.7, GSE is used as contributing to air quality emissions.  
D.17 GSE is spelled out as related to increased fuel consumption                                                                 |                                                                                               |
| 45  | D.7      | Mitigation is technically not required... passive voice, by whom, for what...so what. Mitigation may be feasible, however. Need to clarify this.                                                              |                                                                                               |
| 46  |          | Construction hours?                                                                                                                                                                                     |                                                                                               |
| 47  | D.8 Table D.6 | What is the source of the CO deminimis level of 100 tons/year? Not just who provided the number, but where does it come from?                                                                          |                                                                                               |
| 48  | D.9      | Item 1, should state it is the responsibility of the federal agency to be consistent with the enforceable policies of the state. The second is the responsibility of regulatory agencies. | Check Subsections of CZMA to see if the second part D stuff is for federal license issuance    |
| 49  | D.9      | Airport is not shoreline, but affected area is shoreline.                                                                                                                                               |                                                                                               |
| 50  | D.9      | Who is the AP and what are the jurisdictional boundaries on this thing. This section suggests that this is a Snohomish County action. Why would Snohomish County apply for a CZMA cert from State?  
Consistency with state enforceable policies not addressed...this is confusing.                                                                 |                                                                                               |
| 51  | D.10     | No land use effects concluded because of not within 65 db. Does not involve approach departure paths and potential changes to this. I'd like to see the noise analysis.                                    |                                                                                               |
| 52  | D.12     | Threshold of significance used in reference to  
No known 4f resources in the project area...unsupported                                                                                       |                                                                                               |
<p>| 53  | D.13     | Conclusion/summary statement illogical – cannot conclude no effect on all fish/wildlife if no permanent residents or critical habitat of listed species or state priority habitats only. What about MMBTA. What about bird strike hazards? |                                                                                               |
| 54  | D.13     | Fails to comply with ESA, no ESA determination referenced or made in the text. Information provided is inaccurate and a misrepresentation of USFWS response: &quot;The USFWS did not provide project specific information, but rather referred to the species list for Snohomish County and the Washington Department of Fish and Wildlife Priority Habitat |                                                                                               |</p>
<table>
<thead>
<tr>
<th>ID</th>
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<th>Response</th>
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<tbody>
<tr>
<td>55</td>
<td>D13</td>
<td>Construction will not affect the Paine Field Open Space...then paragraph moves into a discussion of runoff and impervious spaces, misplaced...AND ... indicates a 1000 sf increase in impervious space. I thought it was all over pavement...what's going on?</td>
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<tr>
<td>56</td>
<td>D14</td>
<td>Unsupported fish/wildlife conclusion</td>
<td></td>
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<tr>
<td>57</td>
<td>D15</td>
<td>HM section in entirety is unsupported...some effect noted but level of effect is not identified and not considered how that level is not significant.</td>
<td></td>
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<tr>
<td>58</td>
<td>D15</td>
<td>Cultural summary – change &quot;no affect&quot; to &quot;no effect.&quot;</td>
<td></td>
</tr>
<tr>
<td>59</td>
<td>D15</td>
<td>Note that FAA consulted with SHPO, but CZMA compliance is identified as a SnoCounty responsibility. Again, jurisdictional confusion reigns.</td>
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<tr>
<td>60</td>
<td>D17</td>
<td>&quot;minor&quot; changes unsupported</td>
<td></td>
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<tr>
<td>61</td>
<td>D17</td>
<td>Increase in VMT numbered but not analyzed, unsupported non significance</td>
<td></td>
</tr>
<tr>
<td>62</td>
<td>D17</td>
<td>Comparison with no action not conducted since no action is said to have no change...there is no comparison presented similar to number of operations</td>
<td></td>
</tr>
<tr>
<td>63</td>
<td>D19</td>
<td>Are table D7 and D8 simply reproductions of tables; but primary column has been renamed to Aircraft Types??? Typo in air taxi 2016 does not reappear here. Sources cited for two tables (B1 - D7 and B2 - D8) vary...credibility issue.</td>
<td></td>
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<tr>
<td>64</td>
<td>D19</td>
<td>Table D8 says preferred alt while table B2 says proposed action</td>
<td></td>
</tr>
<tr>
<td>65</td>
<td>D23, Figs D3-6</td>
<td>Noise diagram are meaningless...see extracted zoom shots</td>
<td></td>
</tr>
<tr>
<td>66</td>
<td>D27</td>
<td>First spelling of FAR on this page...move to front/first use.</td>
<td></td>
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<tr>
<td>D27, Fig D-7</td>
<td>Land use compatibility matrix unclear about what it says and what conclusions are based on the matrix. No explanatory text. Title unclear about data.</td>
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<tr>
<td>D27, Second para</td>
<td>FAA regulations...where, which regulations? &quot;are considered significant&quot; by whom and how? No citation or reference and in passive voice. See, for example, <a href="http://www.plainlanguage.gov/howto/guidelines/biodoc/fullbiodoc.doc">http://www.plainlanguage.gov/howto/guidelines/biodoc/fullbiodoc.doc</a>. Note: plainlanguage.gov space is provided by FAA.</td>
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<tr>
<td>D27, Third para</td>
<td>Subject verb misaligned</td>
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<tr>
<td>D27, last para</td>
<td>Unsupported conclusion re significance</td>
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<tr>
<td>D29</td>
<td>Secondary impacts section is replete with unsupported conclusions, lack of analysis – how can significance be determined?</td>
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<td>D.30, socio</td>
<td>Unsupported conclusion...re significance and no major shifts in public demand expected</td>
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<tr>
<td>D.31 first para</td>
<td>Vague...deficient level of service? Acceptable level of service? What is that?</td>
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<tr>
<td>D.31 first para</td>
<td>No action has no traffic effects? Cannot be true since a traffic change is associated with number of ops and number of ops will grow by 5% in 2010 and 8% by 2016. The proposed action ups the annual rate of operations change to 8% in 2010 and 10% in 2016. Need better analysis of traffic. When daily trips are considered, one would apply a certain rate of “enplanements” which is not discussed in the EA and apply that to the traffic situation. Thus, we have a potential of an additional 326 deplanements daily in 2010 and an additional 672 deplanements in 2016. This does not account for the number of people arriving to get on a plane. Last sentence is meaningless...Mitigation is the responsibility of Snohomish DOT agreements? How will this mitigation work? What reduction in anticipated elevations will it cause?</td>
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<tr>
<td>General</td>
<td>Analysis appears to be contained within the appendices. Data, methodology and conclusions not presented in EA</td>
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<tr>
<td>D.31</td>
<td>Env Consequences. What year?</td>
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<tr>
<td>D.32, last para</td>
<td>Conclusion of not significant unsupported. Requirement for mitigation unclear...why under jurisdiction of FAA is required to comply with state/local traffic requirements?</td>
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<tr>
<td>D.33</td>
<td>Within influence area used here</td>
<td>Mitigation fee is 333K over 3M project is 11% of total project cost. Looks significant to me.</td>
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<tr>
<td>D.33</td>
<td>No action, no effect on WQ...inaccurate</td>
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<tr>
<td>D.34</td>
<td>Action significance conclusion unsupported</td>
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<tr>
<td>E.1</td>
<td>Preparers quals not included per 1502.17</td>
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<tr>
<td>General</td>
<td>No literature cited</td>
<td></td>
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<tr>
<td>Appendix A</td>
<td>Letters from Allegiant Air with indication of starting air service, estimated number of departures and personnel; no traffic estimates</td>
<td></td>
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<tr>
<td>Appendix B</td>
<td>Jun 09 Barnard Dunkelberg ltr indicates BD is working for Snohomish County; request to ATC if any issues are assoc with planned departures per day Jun 22 BD ltr to EPA same boilerplate</td>
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<td>Jun 22 BD ltr to FAA Cayla Morgan; asks for copy of letter sent to agencies for coordination??</td>
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<td>Jun 22 BD ltr to USFWS asking if they know of any listed spp that would be adversely impacted...</td>
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<td>Jun 22 BD ltr to NRCS Everett Service Center boilerplate</td>
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<td>Jun 22 BD ltr to NRCS State Conservationist boilerplate</td>
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<td>Jun 22 BD ltr to USDA wildlife</td>
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<td>Jun 22 BD ltr to NPS</td>
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<td>Jun 22 BD ltr to WA DOT Aviation Division boilerplate</td>
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<td>Jun 22 BD ltr to WA DOT NEPA/SEPA expert Cheryl McNamara</td>
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<td>Jun 22 BD ltr to WA DOT Northwest region</td>
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<td>Jun 22 BD ltr to Geoff Talent at Ecology NWRO</td>
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<td>Jun 22 BD ltr to WDFW region 4</td>
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<td>Jun 22 BD ltr to WA State Parks</td>
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<td>Appendix C</td>
<td>Agency responses</td>
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<td>Snohomish Co SMA -- not triggered</td>
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<td>WA DOT -- several intersections may be affected; coordinate with WDOT</td>
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<td>WDFW provides poc and web site</td>
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<td></td>
<td></td>
<td>USFWS -- get list from web site and include access date in section 7 consultation</td>
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<td>USDA -- concern about potential roosting places at new construction; foraging opportunities such as landscaping, dumpster, etc. also coordinate with USDA biologist on site</td>
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<td>NPS -- are new aviation easements required?</td>
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<td>Appendix D</td>
<td>Noise analysis, Nov 2009</td>
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<td>3.1.1 Base Case Refers to appended and tabular data not so designated in the document -- i.e. Not provided.</td>
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<td>Other situations that appear to be references back to the EA</td>
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<td>Appendix E</td>
<td>AQ worksheets</td>
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<td>Appendix F</td>
<td>Traffic -- no change in LOS from no action to action</td>
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<td>Note mitigation statement: Snohomish County imposes Transportation Demand Management (TDM) as a way to reduce</td>
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<td>Single-occupancy vehicles during the AM and PM peak-hours. TDM mitigation can be satisfied by paying a fee or providing adequate on-site measures. SCC 60.66B.640 requires pedestrian improvements and bicycle parking to satisfy the on-site TDM requirements. An existing pedestrian walkway from Airport Road to the project will satisfy the on-site pedestrian walkway measures of TDM. Bicycle parking spaces for 5 bicycles, equal to 2% of the peak-hour trips generated by the project, will need to be provided to satisfy the bicycle portion of the TDM requirements. Providing these on-site measures will mean that the project is not required to pay TDM mitigation fees and will also receive a 5% credit towards the Snohomish County, WSDOT and City of Mukilteo mitigation fees.</td>
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<tr>
<td>App H</td>
<td></td>
<td>Paine Field ltr saying no effect on endangered species. Only sighting information provided; no listing</td>
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Smaller Airports May Endanger Health

California research finds higher pollution levels, though risks are unclear

Posted: December 4, 2009

HealthDay

By Steven Reinberg
HealthDay Reporter

FRIDAY, Dec. 4 (HealthDay News) -- As corporate and private jets take off and land at small airports across the country, their engine exhaust fills the air with small particles of combustion that could affect the health of people living nearby, suggests a new study by California researchers.

Though air pollution has long been recognized as a problem near major airports, far less research has been done on the situation near regional airports, which are seeing ever-increasing traffic, the researchers said.

"The impact area from the regional airport that we studied was much larger than the impact of a freeway," said lead researcher Suzanne E. Paulson, a professor of atmospheric chemistry at the University of California, Los Angeles.

"People who live near airports are exposed to high levels of the pollutants that come from airplane exhaust," she said.

Air pollution has been linked to heart disease, asthma and other serious medical problems, Paulson said. A report on the research was published online Nov. 20 in Environmental Science & Technology.

For the study, Paulson's team measured air pollutants near the Santa Monica Airport, an airport for private planes and corporate jets in southern California. They found a greatly increased level of tiny particles called ultrafine particles, which are less than 1/500th the width of a human hair.

In fact, the amount of these particles present in the air was up to 10 times higher downwind from the airport, at a distance of about one football field, and 2 1/2 times higher at a distance of about six football fields.

How bad these ultrafine particles are for people's health is not known, Paulson said. "There are indications that very small particles have a lot of toxic effects, but we haven't looked at these particular particles," she said.

"But, operating on a precautionary principle, I wouldn't want to live downwind of a takeoff area from an airport," she added.

Paulson admits that there is little that can be done to reduce pollution near established airports. But planning for new airports should include a buffer area between the airport and homes and
businesses, she said.

John Clark III, a researcher in the department of epidemiology at the University of Miami Miller School of Medicine, said that "these smaller particles can have a health effect."

But he acknowledged that many people who live near airports might have few if any options, and creating a buffer zone at existing airports also might not be possible.

In addition, because the exact health effect of this type of pollution is not known, Clark said it's too early to make a case that these airports should be closed or people should be moved to other locations.

Nonetheless, he said, the information should help inform and provide more evidence to residents and public health officials of the extent of the pollution and perhaps spur new research to identify the health risks.

"This study shows that noise pollution may not be the only health hazard of living near an airport," Clark said.

More information

The U.S. Environmental Protection Agency has more on air pollution.

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Response to Comment

Dear Sanjaya Bandaragoda:

Thank you for your comments to the FAA; they have been noted. Please refer to the following general responses (see Appendix S) that apply to your comments.

**General Response 1-8:** Adequacy of FAA guidance and use of FAA guidance

**General Response 1-9:** Roles of consultant and their qualifications

**General Response 3-5:** Why was 2016 selected as the future year?

**General Response 4-1:** Alternative airports should be used

**General Response 7-7:** Noise impacts on schools

Please also refer to the following individual response.

Attachments:

In response to comments made within the attachment to your letter, please see the individual response letter for Dallas Meggitt.
As a Mukilteo homeowner for nearly 20 years, I am writing to you to express my sincere opposition to the change of classification of Paine Field allowing commercial airline flights.

- An Environmental Impact study would truly explore the consequences of opening Paine Field to commercial airline flights. I do not believe the Environmental Assessment was a thorough enough study for such a significant change to our community.
- My understanding is that the study examined impact to our community for a 5-year period. A more clear picture of the impact on our community would have resulted from a longer term study -- 20 years at least.
- Since federal law appears to make the change in an airport’s status permanent, this decision to change the classification of the Paine Field Airport has far-reaching implications.
- Even if we agree that five flights a day from Horizon and two flights a week Allegiant Air would have the minimal impact described in the environmental assessment, we realize that increasing the number of flights is likely, and would clearly have more impact on traffic, noise, air quality and home values.
- There are several school in close proximity to the airport and many others in the flight paths. We need to look at the safety and noise impact commercial flights would have on children and their learning.
- There is a wetlands preservation area adjacent to the airport and the addition of commercial flights to the Paine Field airport would directly contradict the mission of this preserve.

It is disingenuous to state that there is or would not be any negative consequences of adding commercial air service to the Paine Field Airport.

We believe a full investigation of the impact is not only necessary but also the only ethical path forward.

Naomi Katsh Barger
2149 Clover Ct
Mukilteo, WA 9275
425 290 8977
nkbarger@gmail.com
Dear Naomi Katish Barger:

Thank you for your comments to the FAA and Paine Field Airport; they have been noted. Please refer to the following general responses (see Appendix S) that apply to your comments.

General Response 1-1: Why can't the County limit or restrict operations?
General Response 1-11: Flawed/inadequate/biased EA
General Response 1-13: Additional study should be conducted
General Response 3-5: Why was 2016 selected as the future year?
General Response 6-1: Significance of Project Effects
General Response 7-6: What are the existing and future noise impacts?
General Response 7-7: Noise impacts on schools
General Response 8-1: Traffic analysis
General Response 9-1: What is the impact upon property values?
General Response 9-8: What are the health and quality of life effects associated with the project?
General Response 10-2: Air quality conformity
General Response 11-1: What is the impact on wildlife?
General Response 11-5: What are the health impacts compared to safety?
General Response 11-12: Wetlands
I am writing today as a concerned citizen and taxpayer of Mukiteo, WA. The strong movement underway by Everett developers and some of our elected representatives at the County level, determined to bring commercial service to Paine Field deeply concerns me.

- The Mayors and City Councils of Brier, Edmonds, Lynnwood, Mountlake Terrace, Mukilteo, and Woodway already oppose expansion at Paine Field.
- They support the MRD document that has been reviewed six times since 1978 and agree to seek a permanent solution that is legally binding, and support the document known as an Inter Local Agreement. This document would protect the quality of life of the communities while supporting a general aviation status and preserving the exclusive use for the Boeing Company.
- The consequences of scheduled service at Paine Field would insure a degradation of property values, thereby lowering the tax revenues for our cities and changing the quality of life for our citizens.
- Please consider documented negative health and learning issues that will affect tens of thousands of school children and help engage our school district in this public discussion.
- While the proponents of scheduled flights state that a few flights a day will not be disruptive, the reality is that once commercial service is allowed, NO ONE will be able to restrict the type of aircraft, commercial or cargo, the time of day, or the number of flights. Airport noise will be heard county wide, not just in the neighborhoods surrounding the airport.
Commercial service will have ramifications throughout the County. If revenue decreases from the six surrounding cities due to property value degradation, taxes will increase throughout the County.

- I urge you to negotiate in good faith. Currently, you have been listening to insinuations made by a low level FAA representative, Airport Director Waggoner, and developers and business interests. Protect our quality of life in Mukiteo and surrounding areas.

I look forward to your reply.

Sincerely,

Lori Baron
5450 94th PL SW
Mukilteo, WA 98275
lori.baron@comcast.net

Following is the text from emails I sent to Cayla Morgan and Dave Waggoner regarding my comments on the Paine Field Environment Assessment. As a Snohomish Country resident, taxpayer and voter, I hold you accountable for fighting against this flawed assessment:

Comments on the Paine Field Environmental Assessment

I am writing to you today to oppose the efforts of the FAA, Snohomish County and Paine Field Airport staff to change Paine Field Airport’s operation certificate from a Category IV airport (which does not allow scheduled commercial service), to a Category I airport, which allows virtually unlimited operations by all types and classes of aircraft.

The Environmental Assessment is so blatantly flawed I consider it an act of fraud on the behalf of all those involved. As a resident of Mukilteo, Washington, a taxpayer, and an honest person, I request that you investigate how such a large act of fraud such as this has come so far in the process. I request new leaders be put in charge.

Comments:

1. The Environmental Assessment (EA) is insufficient in that it does not acknowledge or analyze the fully allowed impacts of the proposal to change the airport category. It only looks at the impacts from 6 to 10 flights/day from Horizon and 2 to 10 flights/week from Allegiant over a minimal period of five years. The assessment needs to consider the proposed airport role change and the impacts from “unconstrained activity” as required by FAA regulations. Also, as is standard with any planning tool, the assessment needs to look out 20 to 30 years, not the minimal 5 years considered in this report. Why have the full impacts of the proposed category change not been considered? When will the full impact be considered? Why was a 5-year horizon analyzed rather than a 20 or 30-year horizon?
2. The proposal of changing the airport category to allow for unlimited commercial flights is enormous in scope. This calls for further studies including a full Environmental Impact Statement (EIS) not the minimal requirements of an Environmental Assessment (EA). Why was an EIS not completed for this project? When will an EIS be prepared for this project?

3. The following is an excerpt from the EA:

   "No Action Alternative

This alternative includes the continuation of the normal operation of the Snohomish County Airport/Paine Field without the provision of scheduled commercial service or any changes to the existing passenger terminal building.

Preferred Alternative

The Preferred Alternative includes the Federal Aviation Administration (FAA) Issuance of operations specifications to allow scheduled commercial air service and Approval of an Amendment to the Airport’s CFR Part 139 operating certificate. In Addition, the Preferred Alternative includes the addition of a modular terminal building to accommodate the proposed scheduled commercial air service.”

What is the justification for the selection of the Preferred alternative? Who are the people that selected the Preferred Alternative? We and thousands of others throughout the community prefer the No Action Alternative. If this was supposed to be an ‘impartial’ assessment, is should have been called the “Proposed Alternative”.

4. At the public meeting I attended on January 21st, 2010, the consultant stated that commercial air service was compatible with the land use zoning of the surrounding area. Please explain how the surrounding residential land use is compatible with commercial air flights. Please include mention of my residence at 5450 94th PL SW.

5. The advertisement for the open house stated that the FAA and Snohomish County representative would be on site to hear what we had to say. No one from the FAA or Snohomish County had a nametag or stood on stage to announce their presents. Please share with us who from the FAA and Snohomish County represented these entities at the January 21st meeting. Dave Waggoner and Paine Field Airport staff was visible. On stage was one a paid consultant from the Barnard Dunkelberg Company out of Oklahoma (who did not look at us while we spoke) and a judge to moderate the hearing. The consultant spoke on stage for 20 minutes telling over 500 people that changing the airport category to allow for unlimited commercial air service would have No Significant Impact on noise, traffic, our health, our schools, our property values, our environment, and our quality of life. This does not pass the reality test. This is blatant fraud. This requires new leaders take over the responsibility to prepare and oversee this study. Who will be assigned the responsibility to ensure this process evaluates the entire scope of the proposed airport category change? Who will be responsible to ensure all relative facts are evaluated? Who will stand in front of the people at public
meetings and testify that unbiased, honesty and do diligence are components of the Assessment prepared by the FAA, Snohomish County and Paine Field Airport?

6. The supporting traffic analysis prepared by Gibson is flawed in that it does not consider fully allowed traffic impacts that would be produced from the change in airport category allowing for unlimited commercial flights from Paine Field Airport. The full range of impacts from the proposed airport category change need to be evaluated.

In addition, the data used 2004 data used for the service radius for new trips are out of date and I am requesting it be updated.

Explain why the fully allowed impacts were not evaluated and when warrants will require their analysis. Explain why the analysis did not take into account vehicle trips that may divert from Sea-Tac International Airport or Bellingham International Airport. Explain who will be responsible to fund the major transportation projects that would be required if the airport category changed to allow for unlimited commercial flights.

7. The noise analysis completed for the EA if insufficient in that it did not look at the increase range of noise decibels residents and receivers will be exposed to. I am requesting a study that evaluates the noise levels using decibel readings that exist today as well as the potential increase in noise levels from the impacts related to changing the airport category to allow for unlimited commercial air service at Paine Field Airport.

The EA study rather looked at a measure of noise called DNL. The report says that, “DNL provides a numerical description of the weighted 24-hour cumulative noise energy level using the A-weighted decibel scale, typically over a period of a year. Noise sensitive areas exposed to increases of 1.5 DNL within the 65 DNL contour are considered a significant impact.” The report also states that, “Noise 65 Day-Night Average Sound Level (DNL) DNL calculations account for the sound exposure level of aircraft, the number of aircraft operations and a penalty for nighttime operations. In the DNL scale, each aircraft operation occurring between the hours of 10 p.m. to 7 a.m. is penalized by 10 dB.”

I requesting data showing the exact decibel levels anticipated and the time and frequency of their occurrence, not an average weighted over a 24-hour and annual basis. Each noise encounter affects the residents. When I am sleeping and awoke by airplane noise I cannot average the impact to me at other intervals between flights. This is not a reasonable way to evaluate noise impact.

The EA noise analysis states the following, “Route 526 to the extreme northwest corner of the Airport. There are 0 residential or other noise sensitive uses and 0 people located within the 65 or greater DNL noise contours. The 70 DNL noise contour is entirely on Airport property except for an area to the northeast where it extends over the Boeing Company complex. Noise sensitive areas exposed to increases of 1.5 DNL within the 65 DNL contour are considered a significant impact.”
The analysis shows that even in its limited scope that noise levels increases are significant as they well exceed the 1.5 DNL averaged level. It also does not pass the validity test that noise generated from this proposal will stay within the airport boundaries. I hear airplane noise all the time. It does not stay within the confines of the airport bubble. An increase in airplane activity will cause an increase in noise levels at our homes and schools. This needs to be studied.

The noise analysis is insufficient in that it does not acknowledge or analyze the fully allowed impacts of the proposal to change the airport category. It only looks at the impacts from 6 to 10 flights/day from Horizon and 2 to 10 flights/week from Allegiant over a minimal period of five years. The Assessment needs to consider the proposed airport role change and the impacts from “unconstrained activity” as required by FAA regulations.

8. Health: The EA ignores the project’s cumulative air quality impacts. The Conformity provision of the Clean Air Act requires that all Federal projects such as this one conform to a State Air Quality Implementation Plan (SIP). While Paine Field is in a “maintenance area”, rather than an area that is in non-attainment of the SIP’s air quality goals, if a Federal project emits more than 100 tons of Carbon Monoxide (CO), a full conformity determination must be performed. Even based on the limited terminal facilities and forecast of operations, the EA predicts that the project will emit 75 tons of CO per year by 2015. Since the EA only evaluates the emissions impacts from the current “phase” of development, the modular terminal, and fails to take into account the impacts of reasonably foreseeable future projects, emissions of CO could very well exceed 100 tons per year.

9. Environment: The following is an excerpt from the EA, “The below list of endangered, threatened and candidate species, along with the species of concern for Snohomish County was reviewed by airport personnel in consultation with the fulltime on-site USDA Wildlife Services Biologist who has been conducting weekly wildlife surveys on the Airport since 2001 (Appendix H).” The EA is insufficient and flawed because it does not look the full extent of changing the airport category to allow unlimited commercial air flights. Environmental impacts are not limited to airport property as the EA reports. There has been no survey of the environments outside of airport property to ensure impacts to endangered species are accounted for.

10. Schools: The following is an excerpt from the EA, “Children’s Environmental Health and Safety Risks. Executive Order 13045, the Protection of Children from the Environmental Health Risks, directs Federal agencies to make it a high priority to identify and assess environmental health risks and safety risks that may disproportionately affect children. There are no residences or schools within the project area.”

The EA is insufficient and flawed in that it considers there to be no residences or schools within the project area. The assessment finds no impact to the surrounding community since it did not include the surrounding community in the assessment. Please explain how the
The project area is confined to only the existing airport. The effects of changing an airport category to allow for unlimited commercial flights surely will have impacts outside of the airport boundaries.

The statement in the Draft EA that no residences or schools are within the project area indicates a thought process and approach that misses the point. This is not just about the construction of a terminal. The FAA, the County, airport officials and the airlines are well aware that the major concerns are about the activities associated with starting up and expanding scheduled service. Impacts to schools, children, playgrounds, hospitals, residents and the communities at large are not restricted to the construction and existence of a terminal building. Listing a technical school and one grade school in the entire Draft EA is absolutely inadequate and unacceptable. Impacts are not restricted to the terminal construction or the day/night noise line that "averages" noise over a 24-hour period.

11. The EA is flawed in that it does not look at the second terminal identified in the airport’s Master plan. The environmental effects of the “Future Passenger Terminal” and its “Access and Parking” have been incorrectly omitted from this EA analysis. As a result, the EA should be re-done.

12. FAA has a conflict of interest. The FAA wants to assess/mitigate the impacts of the proposed role change on a relatively low level of activity while on the other hand their regulations require that the airport accept any and all activity literally 24/7. Good deal for the FAA, bad deal for communities; the FAA finds little or no impact from this proposal and the surrounding communities get to shoulder the load of all of the "unconstrained" future growth. This conflict of interest is apparent throughout this EA, as the EA makes contradictory and unreasonable conclusions. Please explain what percentage of the airports funding has come from the FAA annually over the past 20 years. Please explain why the FAA is a proponent of engaging in commercial air flight at Paine Field.

I say give up FAA funding if we need to. Tax the communities to keep Paine Field as a category IV airport that will not allow commercial air service. The cost of our homes, families, and health are much more important than any FAA funding. This does not just affect Mukilteo. Flight paths will affect Whidbey Island, Mukilteo, Marysville, Everett, Stanwood, Snohomish, Mill Creek, Lynnwood, Edmonds, Mountlake Terrace Kenmore and Bothell.

13. The forecast timeframe in the EA should not be limited to 2016. The EA refers to an air emissions timetable requirement of 2016. This should not be the basis for forecasting scheduled service activity levels of any proposal. The airlines are not motivated to provide you the maximum level of potential activities. The FAA itself requires much longer planning horizons than 5 years or 2016 and so they should forecast that far for alternatives in the EA.
14. Requirements to fully consider all impacts to children alone should have driven a rigorous analysis of this issue and not just a few flights but the maximum level. A rigorous analysis must include more than just noise but air emissions, traffic, disruptions to learning, health impacts to children and so on. The Executive Order 13045 referenced in the Draft EA should be adhered to and not dismissed because many schools are in the flight paths and near to the airport, even if they are not directly on airport property, which is all this EA looked at.

15. The EA does not address the community opposition or the fact that the Mayors and City councils of Brier, Edmonds, Lynnwood, Mountlake Terrace, Mukilteo, and Woodway oppose expansion at Paine Field. Would they really be so opposed if there were No Impacts? Why has this opposition and community polling not been included in the EA? When looking at an environmental impact should we not consider how it affects the people who live in the area. There are homes surrounding the airport and under the flight paths.

16. The EA is flawed in that it does not consider the loss of tax revenue as related to reduced home values. I know real estate agents who say people are afraid to move into the area because of the proposal to allow commercial air service out of Paine Field. There is clearly a stigma of having a commercial airport in your back yard. How people do you know who are looking for a nice house near a commercial airport? Please add to the Assessment a section analyzing the impacts to property values in the area and under the flight path as a result of the proposal to allow unlimited commercial air flights out of Paine Field.

17. The EA is flawed in that it does not look at other locations for commercial flights. What other airports were looked at? What forecaster is showing a need for additional commercial flights? Where is this documented?

18. Will a certain percentage of airport time be protected for Boeing? It is important to ensure that Boeing stays in Everett. It provides high paying jobs with health care in our community.

The Governor, our Senators, our US Representatives, our District Senator and Representatives, our County Executive, our County and City council members, the WSDOT, the FAA, Snohomish County and the Paine Field Airport should immediately order a new Environmental Assessment with the inclusion of both new terminals and their REAL maximum capacity. The impacts of two large terminals in operation 24 hours a day seven days a week must be studied.

The EA significantly failed to properly scope out the impacts of changing the airport role and operating certificate to allow scheduled service. Therefore, the “No Action Alternative” must be the default alternative until a comprehensive full-capacity EIS is completed and compared to alternatives.
Response to Comment

Dear Lori Baron:

Thank you for your comments to FAA, Snohomish County, and Paine Field Airport; they have been noted. Please refer to the following general responses (see Appendix S) that apply to your comments.

General Response 1-1: Why can't the County limit or restrict operations?
General Response 1-4: The County should no longer seek FAA funds
General Response 1-6: What are the FAA and County roles in this EA and has a decision been made to move forward?
General Response 1-8: Adequacy of FAA guidance and use of FAA guidance
General Response 1-9: Roles of consultant and their qualifications
General Response 1-11: Flawed/inadequate/biased EA
General Response 1-12: Adequacy of public involvement and release of the Draft EA and Public Hearings
General Response 1-13: Additional study should be conducted
General Response 1-15: EA did not reflect the opposition of the community
General Response 2-1: MRD document
General Response 2-2: Boeing reaction to the Proposed Project and effect of the Project on Boeing
General Response 3-1: What is the purpose and need for the action or project?
General Response 3-5: Why was 2016 selected as the future year?
General Response 3-11: What is the capacity of the terminal?
General Response 3-12: What is the relationship of the two terminals?
General Response 3-13: What is a Class I Airport? Explanation of Federal Aviation Regulations (FAR) Part 139
General Response 4-1: Alternative airports should be used
General Response 4-6: What does the term "Preferred Alternative" mean?
General Response 5-5: Study Areas
General Response 6-4: What are the quality of life impacts?
General Response 7-1: Use of DNL
General Response 7-2: Noise Measurements and Supplemental Metrics requested
General Response 7-6: What are the existing and future noise impacts?
General Response 7-7: Noise impacts on schools
General Response 7-12: How are the potential noise impacts compatible with surrounding residential land uses?
General Response 8-1: Traffic analysis
General Response 8-2: Why weren't diverted trips accounted for?
General Response 9-1: What is the impact upon property values?
General Response 9-2: Indirect/induced traffic effects
General Response 9-8: What are the health and quality of life effects associated with the project?
General Response 10-2: Air quality conformity
General Response 11-1: What is the impact on wildlife?
---Original Message---
From: Cayla.Morgan@faa.gov [mailto:Cayla.Morgan@faa.gov]
Sent: Wednesday, January 13, 2010 4:00 PM
To: Waggoner, Dave; Dolan, Bill; Ryk Dunkelberg; Ryan Hayes
Cc: Patricia.Deem@faa.gov; Caroline.CTR.Poyurs@faa.gov;
Roland.J.McKee@faa.gov
Subject: Fw: Paine Field proposal

Cayla Morgan
Environmental Protection Specialist
Seattle Airports District Office
Federal Aviation Administration
425-227-2653

----- Forwarded by Cayla Morgan/ANM/FAA on 01/13/2010 02:58 PM -----
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B.72
Hi Cayla

I read the notice about a third hearing scheduled at the Lynnwood Convention Center and I just wanted to share my thoughts with you.

I believe that the past two meetings consisted mostly of anti-airport folks and I hope that the F.A.A.'s decisions aren't based strictly on these hearings. I know that the environmental assessments have been positive for the airport to allow Horizon and Allegiant Air to fly in and out of Paine Field.

I myself live within a mile or two of the airport and believe there will be no adverse impact on the local area and I believe it will be a positive for economic recovery in general as far as jobs and businesses not to mention the convenience factor of not having to drive to SeaTac Airport!

Thanks and good luck.
Linda Barry

Hotmail: Trusted email with powerful SPAM protection. Sign up now.
Response to Comment

Dear Linda barry:
Thank you for your comments to the FAA; they have been noted.
I attended the FAA hearing at my son's high school the other night.

You miscalculated the audience and I was not allowed in the hall.

You have also miscalculated the effects these planes will have on our wildlife. When I saw that you concluded that the environmental impact would be zero to minimal I was sad. It was completely obvious to me that the people who did this study do not understand that these planes WILL have an effect on the birds in the area, on the groundwater and consequently on the salmon and thus whales in the area.

You may be from the FAA. I do not know where you reside. But I can tell you that we here in the Puget Sound Region do care a lot about the water, the sky, the birds, the fish even for the priceless gift of silence. If you just look around here at the Olympics and the Cascades and the Puget Sound you will see that there is Great Nature, Great Serenity, Great Beauty.

There is an abundance of wealth here in this region, because we care about our Earth and we work for her preservation.

So please do not come to visit to try to intrude on our great quality of life. You are a welcome guest. My home is open for you to come and visit any time you like. But you are not welcome to come and intrude you sickening, exhausting, deafening airplanes into our cherished way of life.

I am speaking for our children, our eagles, our birds and our trees and our fish. Keep the planes in one place.
There is no reason to destroy another beautiful place for us to fly our airplanes.

Yours Truly,

Bradley Barton
5910 147th St. SW
Edmonds WA 98026
425-743-6852
Dear Bradley Barton:

Thank you for your comments to Paine Field Airport; they have been noted. Please refer to the following general responses (see Appendix S) that apply to your comments.

General Response 1-12: Adequacy of public involvement and release of the Draft EA and Public Hearings
General Response 6-1: Significance of Project Effects
General Response 11-1: What is the impact on wildlife?
General Response 11-10: Water quality impacts
From: County Executive [mailto:county.executive@co.snohomish.wa.us]
Sent: Tuesday, January 26, 2010 8:05 PM
To: Waggoner, Dave; Air Service Comments
Subject: FW: Accountability at Paine Field -- please go to bat for us.

Amy Ockerlander
Snohomish County Executive Office
3000 Rockefeller, M/S 407
Everett, WA 98201-4046
Phone: 425-388-3460
Fax: 425-388-3434
Email: amy.ockerlander@snoco.org
www.snoco.org

From: Bradley Barton [barto017@hotmail.com]
Sent: Monday, January 25, 2010 6:07 PM
To: County Executive
Subject: Accountability at Paine Field -- please go to bat for us.

Dear County Executive Aaron Reardon,
Please do not sit back and allow the unforgivable to happen--Class I status at Paine Field.

If you do you will have destroyed this Mukilteo, Lynwood, Picnic Point Beach, Meadowdale Beach area. It will never be the same.

I attended the FAA hearing at my son’s high school the other night.
They miscalculated the audience and I was not allowed in the hall.
They have also miscalculated the effects these planes will have on our wildlife. When I saw that they concluded that the environmental impact would be zero to minimal I was sad. It was completely obvious to me that the people who did this study do not understand that these planes WILL have an effect on the birds in the area, on the groundwater and consequently on the salmon and thus whales in the area.

Aaron you know as well as I do here in the Puget Sound Region do care a lot about the water, the sky, the birds, the fish even for the priceless gift of silence. If you just look around here at the Olympias
and the Cascades

and the Puget Sound you will see that there is Great Nature, Great Serenity, Great Beauty.

There is an abundance of wealth here in this region, because we care about our Earth and

we work for her preservation.

So please do not allow others to intrude on our great quality of life.

I am speaking for our children, our eagles, our birds and our trees and our fish. Keep the planes in one place.

There is no reason to destroy another beautiful place for us to fly our airplanes.

Please just go out to the Mukilteo lighthouse some day, any day, and see what a treasure lies there.

I beg of you Aaron to not let this happen. I look forward to seeing your great leadership on this matter and I thank you for

your integrity and courage. May God bless you.

Yours Truly,

Bradley Barton
5910 147th St. SW
Edmonds WA 98026
425-743-6852

Hotmail: Powerful Free email with security by Microsoft. Get it now.
Response to Comment

Dear Bradley Barton:

Thank you for your comments to Snohomish County; they have been noted. Please refer to the following general responses (see Appendix S) that apply to your comments.

General Response 1-12: Adequacy of public involvement and release of the Draft EA and Public Hearings
General Response 6-1: Significance of Project Effects
General Response 11-1: What is the impact on wildlife?
General Response 11-10: Water quality impacts
Cayla Morgan
Environmental Protection Specialist
Seattle Airports District Office
Federal Aviation Administration
425-227-2653

----- Forwarded by Cayla Morgan/ANM/FAA on 01/26/2010 05:00 PM -----

From: Bradley Barton <bartoo17@hotmail.com>

To: Cayla Morgan/ANM/FAA, Lisa Barton <lisabarton64@gmail.com>

Date: 01/25/2010 05:49 PM

Subject: no class I at Paine Field.
Dear Mrs. Morgan,
I attended the FAA hearing at my son's high school the other night.

You miscalculated the audience and I was not allowed in the hall.

You have also miscalculated the effects these planes will have on our wildlife. When I saw that you concluded that the environmental impact would be zero to minimal I was sad. It was completely obvious to me that the people who did this study do not understand that these planes WILL have an effect on the birds in the area, on the groundwater and consequently on the salmon and thus whales in the area.

You may be from the FAA. I do not know where you reside. But I can tell you that we here in the Puget Sound Region do care a lot about the water, the sky, the birds, the fish even for the priceless gift of silence. If you just look around here at the Olympias and the Cascades and the Puget Sound you will see that there is Great Nature, Great Serenity, Great Beauty.

There is an abundance of wealth here in this region, because we care about our Earth and we work for her preservation.

So please do not come to visit to try to intrude on our great quality of life. You are a welcome guest. My home is open for you to come and visit any time you like. But you are not welcome to come and intrude you sickening, exhausting, deafening airplanes into our cherished way of life.

I am speaking for our children, our eagles, our birds and our trees and our fish. Keep the planes in one place.

There is no reason to destroy another beautiful place for us to fly our airplanes.
Yours Truly,

Bradley Barton
5910 147th St. SW
Edmonds WA 98026
425-743-6852

Hotmail: Free, trusted and rich email service. Get it now.
Response to Comment

Dear Bradley Barton:

Thank you for your comments to the FAA; they have been noted. Please refer to the following general responses (see Appendix S) that apply to your comments.

General Response 1-12: Adequacy of public involvement and release of the Draft EA and Public Hearings
General Response 6-1: Significance of Project Effects
General Response 11-1: What is the impact on wildlife?
General Response 11-10: Water quality impacts
----- Original Message -----
From: Cayla.Morgan@faa.gov [mailto:Cayla.Morgan@faa.gov]
Sent: Monday, January 25, 2010 3:17 PM
To: Waggoner, Dave; Dolan, Bill; Ryk Dunkelberg; Ryan Hayes
Subject: Fw: Paine Field

Cayla Morgan
Environmental Protection Specialist
Seattle Airports District Office
Federal Aviation Administration
425-227-2653

---- Forwarded by Cayla Morgan/ANM/FAA on 01/25/2010 02:17 PM ----
| From: |
| Tom Bauer <bauertbiz@verizon.net> |
| To: |
| Cayla Morgan/ANM/FAA@FAA |
| Date: |
| 01/23/2010 06:53 PM |
| Subject: |

Paine Field
I fully support the environmental assessment conducted for Paine Field in Everett. I live near Paine Field (2 miles away) and I average about 30 round trips to Sea-tac each year. Each way takes roughly 1 hour of me driving through Seattle to get to the airport. If Paine Field is built that could take my car (and all of it's emissions) off the road for 60 hours each year and reduce traffic on I-5 between Everett and Sea-tac.

There has already been sufficient studies (and money) spent on commercial air traffic to Paine Field and I would like to see the airport move forward. Let's have some progress and stop the paralysis by analysis.

Sincerely,
Thomas Bauer
Everett, WA
425-337-6608
Response to Comment

Dear Thomas Bauer:

Thank you for your comments to the FAA; they have been noted.
I would like to state my preference that Paine Field be removed from consideration for allowing commercial flights to arrive or depart from Paine Field.

I am a resident of Mukilteo and though it would be convenient for me to take advantage of such flights myself, I would prefer to have to drive the distance to SeaTac in order to preserve the peace and tranquility in which we invested in Mukilteo.

While Paine Field might have an Everett address, it consumes Mukilteo by ground and air. The activity of increased flights, noise, gas fumes, and added traffic provide only negative ramifications to our beautiful little town. While Everett and Snohomish County might enjoy mostly benefits from turning Paine Field into a commercial airport, the cost will be great to the Mukilteo taxpayers.

Please, I ask that commercial flights not be allowed at Paine Field now and forever.

Thank you and Sincerely,

Jennifer D. Baxter
703 Washington Ave.
Mukilteo, WA 98275
Response to Comment

Dear Jennifer Baxter:

Thank you for your comments to the FAA and Paine Field Airport; they have been noted. Please refer to the following general responses (see Appendix S) that apply to your comments.

- General Response 1-10: Scope of the EA analysis for future operations and passengers
- General Response 4-1: Alternative airports should be used
- General Response 6-1: Significance of Project Effects
- General Response 6-3: What are the project benefits?
- General Response 7-6: What are the existing and future noise impacts?
- General Response 8-1: Traffic analysis
- General Response 10-4: Would there be an increase in fuel dump/fuel smell/residue?
From: Jeanne Beals [mailto:elbijab@whidbey.net]
Sent: Friday, February 05, 2010 5:45 PM
To: Air Service Comments
Subject: Commercial use of Paine Field

8204 Olympic View Lane
Clinton, Wa. 98326
February 5, 2010

Dear Mr. Dave Waggoner:

This letter is to request the approval for commercial use of Paine Field, Everett, Wa.

We have been residents of Seattle for over 29 years and now reside on South Whidbey for the past ten years. Over those years we have made many trips past Paine Field and have watched the area of Mukilteo and South Everett grow tremendously in population. We feel those property owners were aware of the nearby airfield at the time they purchased yet made the decision to purchase there. Boeing planes and other aircraft fly over our area frequently and it does not disturb us.

It would benefit us as well as many travelers from Whidbey Island to be able to utilize this airport without having to travel near two hours to SeaTac.

Thank you very much for your attention

Sincerely, Jeanne A. Beals and Ernest L. Beals  elbijab@whidbey.net
Dear Jeanne and George Beals:

Thank you for your comments to Paine Field Airport; they have been noted.
--- Original Message ---
From: Cayla.Morgan@faa.gov [mailto:Cayla.Morgan@faa.gov]
Sent: Friday, February 19, 2010 4:04 PM
To: Waggoner, Dave; Dolan, Bill; Ryk Dunkelberg; Ryan Hayes
Subject: Fw: Public Comment Period Paine Field

Cayla Morgan
Environmental Protection Specialist
Seattle Airports District Office
Federal Aviation Administration
425-227-2653

--- Forwarded by Cayla Morgan/ANM/FAA on 02/19/2010 03:03 PM ---

| "Jeanne Beals" <elbjab@whidbey.net>
| |
| |
| To: Cayla Morgan/ANM/FAA@FAA
| |
| Date: 02/05/2010 04:34 PM
| |
| Subject: Public Comment Period Paine Field
| |
Dear Ms. Morgan:

We would like to comment on the future use of Paine Field, Everett, Wa.

Presently, we reside on South Whidbey Island and have for the past eleven years. Previously, we lived in Seattle for over 29 years. In all of those years we have made many trips past Paine Field. Presently, Boeing planes and other planes fly over our area and it is of no disturbance to us.

It is our desire that the airfield again be utilized for all types of public transportation. We do travel frequently, as do many residents of this Island, and it certainly would be of greater convenience to us not having to travel for near two hours to SeaTac.

We have observed the area of Mukilteo and South Everett grow tremendously. We feel that when those people purchased their property they were well aware of the air field nearby, yet they made that choice.

PLEASE allow commercial use of all types for this airport.

Thank You kindly for your attention.

Sincerely, Jeanne A. and Ernest L. Beals  elbjab@whidbey.net
Dear Jeanne and George Beals:

Thank you for your comments to the FAA; they have been noted.
I am writing to voice my strong opposition to expanded use of Paine Field for commercial flights.

As a resident of South Whidbey Island, I believe the quiet and peace afforded by our rural environment – the very reason many of us chose this place to live -- would be significantly jeopardized by such an expansion.

Put me down as opposing this proposal.

Linda Beeman
4345 Terra Bella Lane
Clinton, WA 98236
Dear Linda Beeman:
Thank you for your comments to the FAA and Paine Field Airport; they have been noted.
----Original Message-----
From: Cayla.Morgan@faa.gov [mailto:Cayla.Morgan@faa.gov]
Sent: Wednesday, January 06, 2010 1:05 PM
To: Waggoner, Dave; Dolan, Bill; Ryk Dunkelberg; Ryan Hayes
Cc: Patricia.Deem@faa.gov; Caroline.CTR.Poyurs@faa.gov; Roland.J.McKee@faa.gov
Subject: Fw: send this later today

Cayla Morgan
Environmental Protection Specialist
Seattle Airports District Office
Federal Aviation Administration
425-227-2653
----- Forwarded by Cayla Morgan/ANM/FAA on 01/06/2010 12:05 PM -----

Bill & Jen Beers <bjbeers@gmail.com> wrote on 01/05/2010 05:29:07 PM:

> [image removed]
>  
> Fwd: send this later today
>  
> Bill & Jen Beers
>  
> to:
>  
> Cayla Morgan
>  
> 01/05/2010 05:29 PM
>  
> To Whom It May Concern:
>  
> We are writing to voice our opposition to the proposed plan to
> expand commercial air service out of Paine Field.
>  
> We have lived in Snohomish County for 20-years. We acknowledge that
> when we purchased my home Paine Field existed. However, it was not
> a commercial airport. The flights that came and went from Paine
> Field were insignificant. We know that Paine Field sees about 140,
> 000 flights each year. However, the vast majority of these are
> small, single engine propeller driven private planes. They are not
> multi-engine commercial aircraft that are currently seeking use of
> the airfield.
>  
> We have several concerns.
>  
> We are concerned to our property values will decline future in an
> already declining market. When conditions dictate, aircraft using
> Paine fly over my home. When larger aircraft fly over it creates
> quite a disturbance. Thankfully, these instances are currently few
> and far between. However, an expansion of airport service will
> increase traffic and noise. As this occurs, our home will become
> less attractive to buyers and will loose value.
>  
> We are not contemplating selling our home any time soon, as we like

B.97
where we live. However, expanded service at Paine will reduce the
livability of my neighborhood. As noted above, aircraft
occasionally fly over our home/neighborhood. Sometimes, especially
with newer aircraft, the noise isn’t that bad. Other times you
wonder if the plane is landing in the yard. Increased service at
Paine will only add to the noise and thereby reduce the quality of
life in our neighborhood.

Finally, we are very concerned about this being the “camel’s nose
under the tent”. We get promises all the time from government
leaders that the starting of “this or that” new program won’t impact
our lives and won’t expand in the future. However, over time,
services always expand and what once was a small operation becomes a
large scale operation. We just don’t believe that the start of
commercial operations at Paine Field won’t lead to full scale air
service as this area grows and traffic at SeaTac becomes more congested.

The county’s development committee’s desire for revenue cannot
dictate all of its decisions. We imagine that those spearheading
this idea do not live near the airport. Perhaps they should
purchase and move into homes on the approach/departure routes.
Maybe then they would not be so eager to see air traffic increased.

Sincerely,
Bill & Jennifer Beers
Lynnwood, WA
Dear Bill & Jen Beers:

Thank you for your comments to the FAA; they have been noted. Please refer to the following general responses (see Appendix S) that apply to your comments.

General Response 1-13: Additional study should be conducted
General Response 3-1: What is the purpose and need for the action or project?
General Response 3-5: Why was 2016 selected as the future year?
General Response 3-14: What actions will require additional environmental review?
General Response 5-1: Existing aircraft noise concerns
General Response 6-1: Significance of Project Effects
General Response 6-4: What are the quality of life impacts?
General Response 7-5: Proposed commercial fleet mix
General Response 9-1: What is the impact upon property values?
General Response 10-2: Air quality conformity
Cayla Morgan
Environmental Protection Specialist
Seattle Airports District Office
Federal Aviation Administration
425-227-2653

----- Forwarded by Cayla Morgan/ANM/FAA on 01/06/2010 12:07 PM -----

bkbehrend@sprint.blackberry.net wrote on 01/05/2010 06:58:50 PM:

> [image removed]
> PAE Airline Service
> bkbehrend
> to:
> Cayla Morgan
> 01/05/2010 06:58 PM
> Please respond to bkbehrend
> Cayla Morgan
> Environmental Protection Specialist
> I support airline service at Paine Field. A few neighbors who bought homes next to the airport should not deprive the many thousands of citizens in north Puget Sound of the convenience of airline service. SeaTac is a very long drive for those of us in the north.
> I am also a pilot and I base my airplane at Paine Field. Additionally, I am a part time Flight Instructor, training primary and instrument students from the airport. When airline service is allowed, it is imperative that general aviation access is not limited. Much of the instrument training in Puget Sound is conducted at Paine Field and this access must continue lest other airports such as Boeing Field are use instead.
> Thank you,
> Brian Behrend
> 425-280-1215
> Sent from my BlackBerry® wireless device
Dear Brian Behrend:

Thank you for your comments to the FAA; they have been noted. Please refer to the following general responses (see Appendix S) that apply to your comments.

**General Response 3-2: What are the effects of the Proposed Project on general aviation?**
----- Original Message ----- 
From: Cayla.Morgan@faa.gov [mailto:Cayla.Morgan@faa.gov]
Sent: Wednesday, January 20, 2010 5:16 PM
To: Waggoner, Dave; Dolan, Bill; Ryk Dunkelberg; Ryan Hayes
Cc: Patricia.Deem@faa.gov; Caroline.CTR.Poyurs@faa.gov;
Roland.J.McKee@faa.gov
Subject: Fw: Commuter Air Service at Paine Field

Cayla Morgan
Environmental Protection Specialist
Seattle Airports District Office
Federal Aviation Administration
425-227-2653
----- Forwarded by Cayla Morgan/ANM/FAA on 01/20/2010 04:15 PM -----
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<td>&quot;John Bell&quot; <a href="mailto:johnrbell@comcast.net">johnrbell@comcast.net</a></td>
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Dear Ms. Morgan,

I cannot attend tomorrow’s meeting in Mukilteo to discuss the subject air service, but please allow me to weigh in via e-mail as an area resident and businessman. I’m concerned by the negative, divisive, and repeated comments being made by a few persistent residents and the impression that those comments represent the feelings of all local residents. I assure you, they do not. I think everyone understands that commuter air service will cause some slight increase in environmental impact. However, most rational people who are not trying to press an emotional agenda will readily acknowledge that these impacts will be miniscule. Aircraft handling and control infrastructure already exists at Paine Field and will require no new major construction. A few commercial flights per day will have an imperceptible impact on traffic on local roads that currently are well under capacity. Current aircraft are very quiet, and a small number of commercial flights per day will have negligible impact on ambient noise near the airport. Today’s aircraft engines also are quite fuel-efficient, and incremental pollution from a few commercial flights per day also will be negligible. Many environmental studies have been conducted in the recent past for Paine Field and the area nearby. Additional studies are a waste of taxpayer money and a waste of time. The local commercial benefits associated with commercial flights are obvious and also are well-documented. There’s no reason any longer to delay implementation of commercial air service at Paine Field.

I urge you to take my comments into consideration when decisions about implementation of commercial air service at Paine Field are undertaken. Thank you for your time.

Sincerely,

John Bell, Owner
WILLIS HALL, a Washington State winery
(360) 653-1247 - phone
(360) 572-0140 - fax
www.WillisHall.com
Response to Comment

Dear John Bell:

Thank you for your comments to the FAA; they have been noted.
I have lived in Edmonds/Lynnwood area my entire life, 50 years and love this area. I have several friends who live in Seattle near, not next to, but near SeaTac airport. You will ruin the quality of life in Mukilteo, Lynnwood and eventually Edmonds and most likely Marysville by expanding your airport service.

I have walked the neighborhoods near SeaTac where sidewalks lead to stairs that lead to nowhere because the house that a family used to live in no longer exists because you can no longer live under those conditions. For the poor people whose homes were not purchased for destruction you now live in a war zone. I had not been to one particular friends home for about 5 years and was there a month ago and standing on the front porch after a plane had flown by I honestly thought we were being bombed, I ducked. My friends said, isn’t that great that is the back noise now from Sea Tac now. It was unbelievable to say the least. Besides just the noise from the plane, which made us have to stop talking, then there was this repeated bombing type noise that ricocheted off of somewhere from the airport. That is what you will be doing to Mukilteo/Lynnwood/Edmonds/Marysville – an inch at a time.

I STRONGLY OPPOSE THE EXPANSION AT PAINE FIELD.

Light rail should go down the I-5 corridor from Sea Tac to Arlington, it could stop at all the park and rides that currently exist.

It is simple.

Kimberly Benton
Lynnwood, WA
Dear Kimberly Benton:

Thank you for your comments to the FAA and Paine Field Airport; they have been noted. Please refer to the following general responses (see Appendix S) that apply to your comments.

- **General Response 1-13:** Additional study should be conducted
- **General Response 3-5:** Why was 2016 selected as the future year?
- **General Response 4-4:** Relationship between capacity at other airports and Paine Field
- **General Response 4-5:** Other modes of transportation may be better alternatives
- **General Response 6-1:** Significance of Project Effects
- **General Response 6-4:** What are the quality of life impacts?
- **General Response 7-6:** What are the existing and future noise impacts?
- **General Response 11-8:** Cumulative impacts
**Comments**

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**Snohomish County Airport**  
**PaineField**  
**Environmental Assessment**

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<tr>
<td><strong>Gretchen Berg</strong></td>
<td>12814. Hummingbird St</td>
<td>206-545-1177</td>
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**COMMENTS:**

What are the benefits to allowing commercial air traffic?  
I already know (and agree with) the negative aspects. Convince me it's for the good of everyone to begin commerical traffic.

---

Comments to:  
Dave Waggoner  
Director  
Snohomish County Airport  
3220 100th Street Southwest  
Everett, Washington 98204  
Email: airserviceaecomments@snoco.org

or

Cayla Morgan  
Environmental Protection Specialist  
Seattle Airports District Office  
Federal Aviation Administration  
1601 Lind Avenue, SW  
Renton, Washington 98057-3356  
Email: Cayla.Morgan@faa.gov

---

Thank You!

---

Barnard Dunkelberg  
Company  
BridgeNet International  
Synergy Consultants  
Gibson Traffic Consultants
Dear Gretchen Berg:

Thank you for your comments to Paine Field Airport; they have been noted. Please refer to the following general responses (see Appendix S) that apply to your comments.

**General Response 6-3: What are the project benefits?**
From: Cayla.Morgan@faa.gov
Sent: Friday, February 19, 2010 5:00 PM
To: Waggoner, Dave; Dolan, Bill; Ryk Dunkelberg; Ryan Hayes
Subject: Fw: EA regarding commercial air service at Paine Field

Cayla Morgan
Environmental Protection Specialist
Seattle Airports District Office
Federal Aviation Administration
425-227-2653

------ Forwarded by Cayla Morgan/ANM/FAA on 02/19/2010 03:59 PM ------

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I am totally against commercial air service. We moved here 30 years ago and have lived cohesively with Boeing and a county airport. We were promised that there would be no commercial air service and all of a sudden the rug is being pulled out from our cities. Once the commercial air service starts there is no stopping it. Please consider a full EIS before making your final decision.

Sandra Berkshire
Mukilteo Washington
Dear Sandra Berkshire:

Thank you for your comments to the FAA; they have been noted. Please refer to the following general responses (see Appendix S) that apply to your comments.

General Response 1-13: Additional study should be conducted
General Response 2-1: MRD document
General Response 3-5: Why was 2016 selected as the future year?
General Response 3-14: What actions will require additional environmental review?
From: County Executive [mailto:county.executive@co.snohomish.wa.us]
Sent: Saturday, January 23, 2010 5:11 PM
To: Waggoner, Dave; Air Service Comments
Subject: FW: Press Release

Amy Ockerlander
Snohomish County Executive Office
3000 Rockefeller, M/S 407
Everett, WA 98201-4046
Phone: 425-388-3090
Fax: 425-388-3434
Email: amy.ockerlander@co.snohomish.wa.us
www.snoco.org

From: Teresa Best [mailto:teresabest@gmail.com]
Sent: Friday, January 22, 2010 10:12 AM
To: County Executive
Subject: Fwd: Press Release

-------- Forwarded message --------
From: Greg Hauth <gregnrox@comcast.net>
Date: Thu, Jan 21, 2010 at 9:36 PM
Subject: RE: Press Release
To: Teresa Best <teresabest@gmail.com>

Thanks for your comments and story Teresa. Please consider sending these notes to our County
elected officials, like Aaron Reardon. You can find his contact data at

Greg Hauth
VP/ SOC

From: Teresa Best [mailto:teresabest@gmail.com]
Sent: Thursday, January 21, 2010 12:06 PM
To: Save Our Communities
Subject: Re: Press Release
We have been Mukilteo residents for over 10 years. We also lived in the West Seattle/Burien area through the 25 years of Sea-Tac’s expansion, including the third runway.

We observed the strong-arm politics of the Port of Seattle and its Commissioners. The struggles the residents experienced were never addressed properly. Hundreds of homes closest to the airport’s flight pattern were secured by the Port for amounts below a "reasonable" market value. The Port’s Noise Abatement Committee never addressed the real problems of operating and expanding commercial airline traffic close to residential areas. The rebuild of Mt. Rainier High School in Des Moines, paid for by the Port of Seattle and Federal funding, is just one example of what could happen to all of our schools in Mukilteo. I hope you’ve researched this particular issue. Mt. Rainier students now attend class in buildings w/ NO windows. The odor of jet fuel remains intolerable. The "quiet packs" on jets are still not enough to keep classes free of jet noise interruption.

Changing classes, waiting for buses, outdoor athletics, etc., is at the risk of breathing contaminated air day after day.

Our memories of this particular fight are too vivid. We both have worked in the transportation industry in the Puget Sound area for over 45 years. We purchased our home in West Seattle in 1971, and immediately began attending meetings on the proposed expansion of Sea-Tac air traffic to Paine Field vs. Boeing Field. The Port of Seattle, the City
of Seattle, King County, and The State of Washington have wanted to put commercial air traffic at Paine Field for nearly 40 years as an answer to air and auto traffic congestion...they have won the fight for each of Sea-Tac’s expansion projects.

We have proceeded to address the threat of commercial air traffic in and out of Paine Field while remodeling our home in the last few years with added roofing materials and triple-pane window installation. We’re too old to be concerned about the reduced value of our home if this fight is lost. We’ll never move again. We, however, are the exception.

The residents of Mukilteo deserve to retain their quality of life and their property values.

We needed to add our comments to those of our Mukilteo neighbors. We wish you success in your efforts and we truly appreciate your commitment to keep Paine Field free of commercial air traffic.

Ed and Teresa Best

On Tue, Jan 19, 2010 at 3:05 PM, Save Our Communities <info@socnw.org> wrote:

Error! Filename not specified.
Error! Filename not specified.
Here is a copy of Press Release from SOC earlier today.

Dear Teresa,

Save Our Communities (SOC) is publicly releasing letters sent to the Snohomish County Council and to Snohomish County Executive Aaron Reardon (attached). Each letter addresses the FAA’s draft Environmental Assessment (EA) and proposal to start scheduled airlines at Paine Field.

SOC asks the County Executive and the County Council to convey concerns to address the limited scope of the Environmental Assessment.

SOC also urges the County Executive and the County Council to rescind the County’s request for FAA terminal construction funds that in effect subsidize Horizon and Allegiant Airlines.

Finally, SOC asks the County Executive to respond to a November, 2008 letter signed by the Mayors of six Snohomish County cities regarding how to reconcile the County position of discouraging scheduled commercial service while still engaging in good faith negotiations required by FAA. The original letter from the six Mayors is available here.

Details about these requests can be found in the attached letters.

Save Our Communities (SOC) is a non-profit organization of concerned citizens from communities throughout Snohomish, Island, and northern King Counties dedicated to preserving the quality of life in this primarily residential area of Puget Sound. Formed in 1992, it is a one-issue group -- specifically, we oppose any attempt to transform Paine Field into a 'SeaTac-North'. More information about SOC is available at www.socnw.org

Contact:
Don Doran, President
president@socnw.org

Please forward this email to friends and family

If you would like to unsubscribe or customize your email communication settings, please click here.

We never sell your personal information or share lists. See our Privacy Policy.

If you received this message from a friend and would like to subscribe, please click here.
Dear Ed & Teresa Best:

Thank you for your comments to Snohomish County; they have been noted. Please refer to the following general responses (see Appendix S) that apply to your comments.

**General Response 4-4:** Relationship between capacity at other airports and Paine Field

**General Response 6-4:** What are the quality of life impacts?

**General Response 9-1:** What is the impact upon property values?
January 22, 2010

Dave Waggoner, Director
Snohomish County Airport
3220 100th Street SW, Ste. A
Everett, WA 98204

Dear Director Waggoner,

Our family vehemently opposes the proposed addition of commercial flights at Paine Field Airport. Once the door is open to it, growth will not be controllable. In the 1978 Mediated Role Determination, Snohomish County promised to maintain Paine Field as a general aviation airport. We feel betrayed by those who value making money over community health.* And to make taxpayers pay for it!

We demand NO COMMERCIAL PASSENGER SERVICE AT PAINE FIELD AIRPORT!

Sincerely,

[Signatures]

Netta Beyerlein
Greg Beyerlein

*10-25% decline in property values; 57% increase in asthma; 28% higher pneumonia/influenza; 26% higher respiratory diseases; 83% higher pregnancy complications; increased learning disabilities in children; greatly increased noise and pollution....to name just a few!
Dear Netta & Greg Beyerlein:

Thank you for your comments to the FAA, Snohomish County, and Paine Field Airport; they have been noted. Please refer to the following general responses (see Appendix S) that apply to your comments.

**General Response 1-1:** Why can't the County limit or restrict operations?

**General Response 2-1:** MRD document

**General Response 3-5:** Why was 2016 selected as the future year?

**General Response 6-1:** Significance of Project Effects

**General Response 9-1:** What is the impact upon property values?

**General Response 9-8:** What are the health and quality of life effects associated with the project?
Cayla Morgan
Environmental Protection Specialist
Seattle Airports District Office
Federal Aviation Administration
425-227-2653

----- Forwarded by Cayla Morgan/ANM/FAA on 12/31/2009 01:45 PM -----

Gary Birenkott <webgonerving@yahoo.com> wrote on 12/31/2009 12:03:09 PM:

> [image removed]
> Paine Field comment
> Gary Birenkott
> to:
> Cayla Morgan
> 12/31/2009 12:03 PM
> Cayla Morgan,
> Environmental Protection Specialist, Seattle Airports District Office, FAA,
> My wife and I are in support of using Paine Field as a commercial airport.
> We have family living on the East side near Spokane and the commercial operation will be a vast improvement on driving 1 hour south to Sea Tac and another 1 hour flight.
> Please pass along our wishes, Thank You.
> And if the commercial operation fails to be approved, we would like the FAA money to the airport to ceses.
> Best regards
> Gary & Hazel Birrenkott
> Snohomish
Response to Comment

Dear Gary & Hazel Birrenkott:

Thank you for your comments to the FAA; they have been noted.
Dear Mr. Dave Waggoner, Ms. Cayla Morgan, and whom it may concern,

From a layman's perspective, the subject assessment found on the web (http://www.painefield.com/airserviceea.html) is comprehensive.

The following are a couple comments:

1) Long-term (meaning well beyond the 2016 projections in the assessment), I hope it's true that there would be no significant negative impact to the residential areas in the vicinity of Paine Field, where people moved assuming no scheduled commercial passenger air service at Paine Field. Will it really only remain a small negative impact or is this the beginning of a slow march to the end of residential areas near Paine Field?

2) My vote is to not put residential areas at risk and to continue using SeaTac and Bellingham International airports, which serve this area extremely well, for scheduled commercial passenger air service, while leaving Paine Field to function as it has for many years.

Respectfully,

Chris Blinn

9073 Surrey Lane SW

Mukilteo, WA 98275

425-355-6465
Dear Chris Blinn:

Thank you for your comments to the FAA and Paine Field Airport; they have been noted. Please refer to the following general responses (see Appendix S) that apply to your comments.

**General Response 3-5:** Why was 2016 selected as the future year?

**General Response 4-1:** Alternative airports should be used

**General Response 6-1:** Significance of Project Effects
-----Original Message-----
From: Cayla.Morgan@faa.gov [mailto:Cayla.Morgan@faa.gov]
Sent: Thursday, March 04, 2010 3:36 PM
To: Dolan, Bill
Subject: Fw: Comments on the Draft Environmental Assessment for Schuled Passenger Airline Service at Paine Field

----- Forwarded by Cayla Morgan/ANM/FAA on 03/04/2010 02:35 PM ------
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| From:  |
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|Jonathan Blubaugh <aracfi@msn.com>
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| To:    |
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|<airserviceeacommens@snoco.org>, Cayla Morgan/ANM/FAA@FAA
|     >-----------------------------------------------
|------>
| Co:    |
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|<dave.waggoner@co.snohomish.wa.us>
|     >-----------------------------------------------
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| Date:  |
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|01/16/2010 01:57 PM
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B.124
Hello Cayla,

I attended the meeting in which comments were gathered on Tuesday, Jan. 5th. I did not comment then, but listened carefully to the consultant's presentation and all the comments.

By way of disclosure I am an Alternate member of the Paine Field Community Council. I am a resident of the City of Everett where I own my home. I hold four FAA Airman Certificates: Commercial Pilot, Flight Instructor, Mechanic (Airframe & Powerplant), and Ground Instructor. I work at Boeing in Everett as an Aviation Maintenance Technician Inspector-Field.

Most of the respondents who represented themselves as opposed to initiation of scheduled passenger airline service at Paine Field stated that one of their main objections was that they believed it likely that it would cause their home values would decline.

I could not find in the Assessment, nor did I hear in the consultant's briefing, where home prices were addressed. I believe this is an oversight. Perhaps home prices ought be addressed in the section titled "Socioeconomic Environment" on page D.30. Moreover, the section titled "Environmental Justice" on page D.29 addresses "whether the proposed action results in disproportionate effects to special population groups. These special population groups include minority, special ethnicity or low income neighborhoods."

If the assertion of opponents is true, then the new service will have a HIGHLY POSITIVE EFFECT ON THESE SPECIAL POPULATION GROUPS because it will contribute good, living-wage jobs and make LOCAL HOME PRICES MORE AFFORDABLE for these hard-working at-risk groups. I was particularly dismayed that one of the commenters suggested that the type of new workers to be employed, "stewardess, flight attendants, and mechanics," he said, would be of too low an income to afford homes in this area. His insulting inference was clearly that he doesn't want low income riff-raff mechanics, such as myself, living in "his" neighborhood. Newsflash: I'm a mechanic employed at KPAE and my wage has enabled me to buy my first home right here in Jet City.

Second, the estimate for air pollution clearly took the most pessimistic assumption possible. That is that all travelers would be new and that none would have flown to or from Seattle-Tacoma International Instead. This is absurd. It seems obvious that MOST PAINE FIELD PASSENGERS WILL BE TRANSFERRING THEIR BUSINESS FROM SEATAC. This will have the tremendously positive effect of vastly decreasing vehicle miles traveled and emissions. The section titled "Operational Emissions" on page D.6 has selected the incorrect assumption. On of the presenters also mentioned this. It makes me sick to have to drive to SEATAC to catch my flights.

Finally, for now, commenters in opposition exposed an extremely inaccurate assumption: that travelers' actual destinations are Portland or to a lesser extent Spokane or Las Vegas. Their assumption is that we can drive quicker to Portland, than to fly, especially when considering parking, check-in, screening, and other typical delays. Thus they believe that flying out of KPAE serves no purpose. Nothing could be further from
the truth. For those of us living north of Lake Union flying out of less crowded KPAE would get us to KPDX much quicker than flying out of KSEA. But most of us don't want to go to Portland. We want to get to Portland so that we can CHANGE PLANES in Portland and GO ANYWHERE BUT PORTLAND.

So I think the EA was too pessimistic.

Sincerely yours,
Jonathan Blubaugh
425-244-7633

Hotmail: Trusted email with Microsoft’s powerful SPAM protection. Sign up now.
Dear Jonathan Blubaugh:

Thank you for your comments to the FAA and Paine Field Airport; they have been noted. Please refer to the following general responses (see Appendix S) that apply to your comments.

- **General Response 6-3**: What are the project benefits?
- **General Response 8-2**: Why weren't diverted trips accounted for?
- **General Response 9-1**: What is the impact upon property values?
- **General Response 9-7**: Project will bring in lower income people and low paying jobs
-----Original Message-----
From: Cayla.Morgan@faa.gov [mailto:Cayla.Morgan@faa.gov]
Sent: Friday, February 19, 2010 3:59 PM
To: Waggoner, Dave; Dolan, Bill; Ryk Dunkelberg; Ryan Hayes
Subject: Fw: Paine Field EA

Cayla Morgan
Environmental Protection Specialist
Seattle Airports District Office
Federal Aviation Administration
425-227-2653

----- Forwarded by Cayla Morgan/ANM/FAA on 02/19/2010 02:58 PM -----

From: Melanie Boaz <mlboaz@gmail.com>
To: Cayla Morgan/ANM/FAA@FAA
Date: 02/05/2010 04:12 PM
Subject: Paine Field EA
Dear Ms. Morgan:

It is with little hope that I add my written response to the community reaction you are collecting regarding the Paine Field Environmental Assessment. Like so many others who attended one or more of the public response hearings, I feel that this decision has already been made. Nevertheless, I would feel that I let my community down if I did not state in writing most critical reason that I feel that both the study and the process are severely flawed and unfair. Please add it to whatever statistics you are collecting.

Though I share in many of the reservations voiced at the Kamiak meeting concerning the parameters utilized for the particulate study, the method for measuring noise levels, and the utter lack of evidence presented concerning the impact on traffic, the most egregious flaw in the Environmental Assessment, I believe, is the short time frame of only five years. Although I realize that a new study would have to be done if an additional commercial airline wished to have flights out of Paine Field, my understanding is that there would be no restriction on the number of flights that Horizon and Allegiant Air could run. And given what Horizon has done in a relatively short time out of Bellingham, the potential number of flights could cause wide-ranging (and damaging) impact to the community beyond levels indicated by the current EA.

I do not know at what level the 5-year timeframe was decided, but it is an unrealistic and wholly irresponsible measure of the impact of commercial traffic at Paine Field on the community of Mukilteo.

I do not know where within the FAA, precisely, the decision to accept the present EA and authorize commercial traffic will be made. It concerns me that people making this decision do not actually realize how close houses, apartments, businesses, and schools are to the airport perimeter. What has been workable for Boeing planes and the small general aircraft seems downright unsafe for the potential traffic; again, I'm looking beyond the 5-year EA limit, but this decision binds us to an uncertain and potential devastating level.

Thus I strongly urge a new study to be done that assesses the impact for the next twenty years, from 2010 to 2030. That is the only fair way to measure what this decision might do to a beautiful and thriving area.

Sincerely,

Melanie Boaz
10803 56th Pl. W.
Mukilteo, WA 98275
**Response to Comment**

Dear Melanie Boaz:

Thank you for your comments to the FAA; they have been noted. Please refer to the following general responses (see Appendix S) that apply to your comments.

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<th>General Response 1-1:</th>
<th>Why can't the County limit or restrict operations?</th>
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<td>Who will make the final environmental determination?</td>
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<td>Adequacy of FAA guidance and use of FAA guidance</td>
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<td>General Response 1-15:</td>
<td>EA did not reflect the opposition of the community</td>
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<td>General Response 3-1:</td>
<td>What is the purpose and need for the action or project?</td>
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<td>General Response 3-5:</td>
<td>Why was 2016 selected as the future year?</td>
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<td>General Response 5-5:</td>
<td>Study Areas</td>
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<td>General Response 7-2:</td>
<td>Noise Measurements and Supplemental Metrics requested</td>
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<td>General Response 10-5:</td>
<td>Question regarding the analysis of PM10 and PM2.5</td>
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<td>General Response 11-9:</td>
<td>How does this project compare to the commercial operations at Bellingham Airport?</td>
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----- Original Message -----
From: Cayla.Morgan@faa.gov [mailto:Cayla.Morgan@faa.gov]
Sent: Thursday, January 28, 2010 10:27 AM
To: Waggoner, Dave; Dolan, Bill; Ryk Dunkelberg; Ryan Hayes
Cc: Patricia.Deem@faa.gov; Caroline.CTR.Poyurs@faa.gov;
Roland.J.McKee@faa.gov
Subject: Fw: Comment about airport

Cayla Morgan
Environmental Protection Specialist
Seattle Airports District Office
Federal Aviation Administration
425-227-2653
----- Forwarded by Cayla Morgan/ANM/FAA on 01/28/2010 09:26 AM -----
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B.131
Here is another comment for you to consider.

Dorota and Janusz Bochniarz (See attached file: Comments to FAA.doc)
Dear Cayla Morgan,

We have attended the meeting concerning Paine Field Airport on Jan 21, 2010. We found that it was attended by more than 500 people and of the people that made public comments 7 were for the expansion and about 50 against. Of those that spoke against, there were:

- Mayors and other city officials
- Experts and regular folks
- People in their 20s and those in their 60s
- People who lived here forever and those who just moved in
- Working class people and businessmen

All in all, it was a crowd that well represented all the residents of Mukilteo and surrounding towns. They all shared a common view that the EA was not adequate and that we are not naive to believe that airlines will continue to function at a several flights a day for ever.

From different comments, one can see that the “no impact” conclusion was made because FAA looked minimum flights added not full capacity. People say that we need another study, but we say why spend more money, look at the facts:

- Property values near SeaTac Airport are low
- Schools near SeaTac were affected and one had to be moved
- We live outside of the noise area as marked on the map that was shown at the presentation and we can hear engines warming up for testing on some mornings. Also, when big planes take off (only occasionally at this point) we have to wait for them to pass before we can talk.
- When we have landed at different airports around the world, most of the time there weren’t any houses near the landing area and there is a simple reason for it: it is impossible to live that close to planes
- You say that nature won’t be impacted, but we know when a retirement center was built near where we lived in Lynnwood, frogs disappeared even though wet area was left for them; birds and squirrels decreased in number too. If planes move in our eagles, owls, and woodpeckers most likely will move out or they will end up on windshields of planes and they are bigger than the seagulls that have damaged planes in SeaTac. Also, what about the whales that visit our beaches? They are sensitive to sound.
- Traffic already is at its maximum with Boeing and ferry with no real place to expand it.

Some people say that we should have known better moving next to an airport. The truth is that we have less noise from planes now than we had when we lived in Lynwood. True that in the summer the little planes make some noise, but they are still quieter than one big plane. We also believe that if the intention was expand the airport the county should have never reclassified the land around the airport from commercial to residential in 1978. Now that it is done, they should realize that they are too late and should look for a
more empty area to build an airport, maybe further north. If the airport is build, lots of money will be spend on fixing the noise problem, the traffic problem, the parking problem, the birds in the airplanes problem, health problems, and learning problems. As a nurse, I say that the best medicine is prevention. So, please wake up and prevent this airport from causing all these problems. Also, remember that only last year was our city of Mukilteo named as the 10th best small town to live in the US. All the residents worked hard to make this city what it is, please don't destroy it.

Sincerely yours,

Dorota and Janusz Bochniarz
Dear Dorota & Janusz Bochniarz:

Thank you for your comments to the FAA and Paine Field Airport; they have been noted. Please refer to the following general responses (see Appendix S) that apply to your comments.

General Response 1-5: Mitigation
General Response 1-10: Scope of the EA analysis for future operations and passengers
General Response 1-13: Additional study should be conducted
General Response 1-15: EA did not reflect the opposition of the community
General Response 3-5: Why was 2016 selected as the future year?
General Response 3-10: What is the capacity of the airport?
General Response 4-4: Relationship between capacity at other airports and Paine Field
General Response 5-1: Existing aircraft noise concerns
General Response 5-4: Existing Traffic
General Response 6-1: Significance of Project Effects
General Response 7-12: How are the potential noise impacts compatible with surrounding residential land uses?
General Response 9-1: What is the impact upon property values?
General Response 11-1: What is the impact on wildlife?
-----Original Message-----
From: Cayla.Morgan@faa.gov [mailto:Cayla.Morgan@faa.gov]
Sent: Wednesday, January 13, 2010 4:02 PM
To: Waggoner, Dave; Dolan, Bill; Ryk Dunkelberg; Ryan Hayes
Cc: Patricia.Deem@faa.gov; Caroline.CTR.Poyurs@faa.gov;
Roland.J.McKee@faa.gov
Subject: Fw: Paine Field Environmental Assessment Report

Cayla Morgan
Environmental Protection Specialist
Seattle Airports District Office
Federal Aviation Administration
425-227-2653

----- Forwarded by Cayla Morgan/ANM/FAA on 01/13/2010 03:01 PM -----
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| From:   |
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| "Djana Bock" <dbock@straussdancers.com> |
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<th>RE: Paine Field Environmental Assessment Report</th>
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Ms Morgan:

While I suspect this letter will be an exercise in futility, I’m going to send it regardless, as I am so upset I can hardly see straight.

Three years ago my husband and I bought a townhouse in Lynnwood. Our realtor assured us Paine Field was only for military and cargo service and there was an agreement it would never ‘go commercial’. So Zow Pow! - look what is about to happen now. I suffer from migraines - a known migraine trigger is loud noise. We are 2.4 miles DUE SOUTH of the main airport runway and directly beneath the flight path. We NEVER would have bought into this area if we’d known this was in the works.

One of the major issues not mentioned at all in the Environmental Assessment recently presented was the negative impact of a growing commercial airport on property values. OF COURSE houses values will decline. People are already not buying here - some of them have spoken at the recent hearings. Another major issue not mentioned at all was the impact on area schools - of which there are many in the flight path area - and the negative effect of the noise on the learning abilities of our young people.

Neither you, your bosses at the FAA, the airlines wanting in to Paine Field, or the Tulsa firm they hired to write that long report cares one scrap about us and our neighborhoods. To you we’re just statistics and lines on a map. The so called Environmental Assessment that has been presented is a glossy FANTASY concocted so that the commercial airlines and the FAA can grab a quick, easy regional airport.

According to the report, every single issue we have with a growing commercial airport is reduced to a conclusion of NO IMPACT. All those lobby signs, all those projections repeating over and over NO IMPACT, NO IMPACT. Do you really think if all of you keep repeating this over and over we’ll start to BELIEVE this?

The NO IMPACT mantra bears no relation at all to the REALITY that those of us who live here will experience. Deteriorating air quality, increasing noise, more road building for airport access, increased vehicle traffic, increased use of police and fire services, strip development near the airport, deteriorating property values, rebuilding of schools - that’s NO IMPACT????!!!

Our Snohomish County Administration obviously believes the taxes from increased airport concessions will offset any drop in property taxes resulting from the devaluing of our homes. The County has rocks in its collective head. Thousands of homes, townhouses and condominiums in Edmonds, Mukilteo, northwest Lynnwood and south Everett will be impacted and fees from cut-rate commercial airline operations will never offset this, PLUS the additional cost to the County for the building of new roads, increased fire and police protection, and all the other expenses that will arise from this airport debacle. It’s way past time for our County Administration to start protecting us, the taxpayers, and not rolling over and lying down for the FAA.
Diana Bock,
Lynnwood WA

P.S. A new job title for your position would make it far less of a black joke. How on earth can an Environmental Protection Specialist work FOR the FAA???
Response to Comment

Dear Diana Bock:

Thank you for your comments to the FAA; they have been noted. Please refer to the following general responses (see Appendix S) that apply to your comments.

General Response 1-9: Roles of consultant and their qualifications
General Response 1-11: Flawed/inadequate/biased EA
General Response 1-15: EA did not reflect the opposition of the community
General Response 2-1: MRD document
General Response 3-5: Why was 2016 selected as the future year?
General Response 6-1: Significance of Project Effects
General Response 6-2: How is significance defined?
General Response 6-4: What are the quality of life impacts?
General Response 7-3: Noise analysis methodology
General Response 7-7: Noise impacts on schools
General Response 8-1: Traffic analysis
General Response 9-1: What is the impact upon property values?
General Response 9-7: Project will bring in lower income people and low paying jobs
General Response 10-2: Air quality conformity
General Response 11-5: What are the health impacts compared to safety?

Please also refer to the following individual response.

No Impacts:

The Draft and Final Environmental Assessment (EA) were prepared in compliance with the Council on Environmental Quality (CEQ) regulations and Federal Aviation Administration (FAA) Orders 1050.1E, Change 1 and 5050.4B. The document presents the existing impacts and the anticipated impacts in the future with and without the proposed actions. Based on the FAA's significance thresholds identified in Order 1050.1E Change 1, the impacts of the actions were then identified as being either above or below the thresholds. If above the threshold, the impact is considered significant. Often the public assumes that a “no significant impact” statement means there are no impacts. Rather, the purpose of the EA is to disclose the probable impacts and their significance. If there are impacts that are less than the threshold of significance, then no federal mitigation is required.
Mr. Cooper:

Three years ago my husband and I bought a townhouse in Lynnwood. Our realtor assured us Paine Field was only for military and cargo service and there was an agreement with the county it would never ‘go commercial’. So Zow Pow! – look what is about to happen now. I suffer from migraines – a known migraine trigger is loud noise. We are 2.4 miles DUE SOUTH of the main airport runway and directly beneath the flight path. We NEVER would have bought into this area if we’d known this was in the works.

(I thought the statistics used to arrive at the NO IMPACT Noise Levels in the Report were especially creative. How the HECK can you AVERAGE noise levels??? Noise is either there – BOOM!!!!!!! – and kids cry and you get a migraine – or it isn’t and life is tolerable.)

One of the major issues not mentioned at all in the Environmental Assessment recently presented was the negative impact of a growing commercial airport on property values. OF COURSE our house values will decline. People are already not buying here – more than one person who attended the hearings declared that they HAD been looking at homes in the area, but now would not purchase anywhere in South Snohomish County due to the possibility of commercial air service in and out of Paine Field.

Another major issue not mentioned at all was the impact on area schools – of which there are many in the flight path area – and the negative effect of the noise on the learning abilities of our young people.

Neither the FAA, the airlines wanting in to Paine Field, or the Tulsa firm they hired to write that long report cares one scrap about us and our neighborhoods. To all of them we’re just statistics
and lines on a map. The so called Environmental Assessment that has been presented is a glossy FANTASY concocted so that the commercial airlines and the FAA can grab a quick, easy regional airport.

According to the report, every single issue we have with a growing commercial airport was reduced to a conclusion of NO IMPACT. All those lobby signs, all those projections repeating over and over NO IMPACT, NO IMPACT. Do you really think if all of you keep repeating this over and over we’ll start to BELIEVE this?

The NO IMPACT mantra bears no relation at all to the REALITY that those of us who live here will experience. Deteriorating air quality, increasing noise, more road building for airport access, increased vehicle traffic, increased use of police and fire services, strip development near the airport, deteriorating property values, rebuilding of schools — that’s NO IMPACT??!!

Then there were the Report’s entirely fictitious projections of future airline traffic used to CONCEAL the fact that once commercial service is allowed in to Paine Field, the FAA can’t set any limits to airline growth. Other airlines will naturally want in and air traffic will increase at a MUCH faster rate than stated in those unbelievably timid projections.

It’s becoming painfully obvious our Snohomish County Administration believes the potential for increased airport revenues will offset any drop in property taxes resulting from the devaluing of our homes. Thousands of homes, townhouses and condominiums in Edmonds, Mukilteo, northwest Lynnwood and south Everett will be impacted and fees from cut-rate commercial airline operations will NEVER offset this. NO IMPACT is also used as an excuse to ignore the vastly increased demand for County services, the additional cost for the building of new roads and airport parking, and all the expenses that our tax dollars have to cover and that will arise from this airport debacle.

It’s way past time for our County Administration to stop spinelessly rolling over and lying down for the FAA and start protecting us, the taxpayers. Remember our tax dollars also pay YOUR salaries.

Diana Bock
Lynnwood
Response to Comment

Dear Djana Bock:

Thank you for your comments to Snohomish County; they have been noted. Please refer to the following general responses (see Appendix S) that apply to your comments.

General Response 1-9: Roles of consultant and their qualifications
General Response 1-11: Flawed/inadequate/biased EA
General Response 1-15: EA did not reflect the opposition of the community
General Response 2-1: MRD document
General Response 3-5: Why was 2016 selected as the future year?
General Response 6-1: Significance of Project Effects
General Response 6-2: How is significance defined?
General Response 6-4: What are the quality of life impacts?
General Response 7-3: Noise analysis methodology
General Response 7-7: Noise impacts on schools
General Response 9-1: What is the impact upon property values?
General Response 11-8: Cumulative impacts
From: Sandi Bond [mailto:sandi_bond@yahoo.com]
Sent: Friday, February 05, 2010 7:10 PM
To: Air Service Comments
Subject: Comments on having commercial airlines out of Paine Field

I think it would be great for Horizon Air to run out of Paine Field. I would much rather drive there than to Seatac. Also, it would be good for the economy of Snohomish County.

Sandi Bond
Response to Comment

Dear Sandi Bond:

Thank you for your comments to Paine Field Airport; they have been noted.
From: Jim Bowen [mailto:tresbowen@comcast.net]
Sent: Friday, February 05, 2010 9:33 AM
To: cayla.morgan@faa.gov
Cc: Air Service Comments
Subject: Paine Field Commercial Service

Thank you for the opportunity to comment on the Paine Field Draft Environmental Assessment.

I fully support providing commercial air service at Paine Field.

I have reviewed the Draft Environmental Assessment and find it to be well done and I could find no faults in the assessment itself. It also makes sense based on my personal experience as an ex-military and commercial pilot as well as my experience living near both military airfields and commercial airports.

Since I have no issues with the assessment, I would like to submit my view based on my personal experiences.

Commercial aircraft noise reduction efforts over the last 20 years has been effective and residents near airports should understand this fact. I previously lived underneath the Dulles flight path when the Concorde SST was operational. In spite of the much higher noise levels of the SST, we quickly became used to the flights. We also lived on Air Force Bases, including living less than 1 block from the flight line at Wright-Patterson AFB where KC-135 tankers (non-hush kit/water injected) operated. These military aircraft were non-compliant to today's commercial aircraft noise regulations by a large margin. However, again, we quickly became used to this noise level. I feel confident the vast majority of residents in Everett, Mukilteo and nearby areas will also become used to the commercial service since it will be quieter and less intrusive than the current Boeing wide-body flights from Paine Field.

When we moved to Snohomish County from the Bellingham area 2 years ago, we seriously looked at 2 houses in Mukilteo as well as houses in two other areas. We chose a house in unincorporated Snohomish County over the Mukilteo properties because of room size/layout, yard size, and green belt considerations. The noise from the airport was not even a minor consideration. I believe the concerns over property value impacts due to the airport are overblown, much less any impact of the minor delta change from the addition of commercial air service.

We currently have to choose between two very inconvenient alternatives for air travel: SEATAC or Bellingham. Whenever possible, we travel out of Bellingham
in order to avoid the dreadful traffic through Seattle. Paine Field commercial flights would reduce traffic through the Seattle I5 corridor and provide a more affordable (parking) and convenient alternative.

Again, thank you for the opportunity to comment.

Jim Bowen

15225 72nd Dr SE
Snohomish, WA 98296
(425) 585-0913
Response to Comment

Dear Jim Bowen:

Thank you for your comments to the FAA and Paine Field Airport; they have been noted.
Cayla Morgan  
Environmental Protection Specialist  
Seattle Airports District Office  
Federal Aviation Administration  
425-227-2653  

----- Forwarded by Cayla Morgan/ANM/FAA on 01/05/2010 02:14 PM -----  

jon@redrl.com wrote on 01/05/2010 12:31:56 AM:  

> [image removed]  
>  
> Paine Field Environmental Assessment  
>  
> jon  
>  
> to:  
>  
> Cayla Morgan  
>  
> 01/05/2010 12:32 AM  
>  
> Hello,  
>  
> As a Mukilteo resident and, with certain restrictions, a proponent  
>  
of commercial passenger flights at Paine Field, I hereby submit two  
>  
> proposed environmental noise restrictions:  
>  
> 1) Restrictions on maximum decible levels.  
>  
> 2) No flights whatsoever between 10 PM and 5 AM  
>  
> Similar restrictions are used with great sucesss at both Stuttgart  
>  
> and Zurich. Both airports make good neighbors due to these strict  
>  
> noise safeguards for the surrounding communities.  
>  
> Sincerely,  
>  
> B. Jon Boyce  
>  
> Mukilteo  
>  
> 425-750-3154
Dear B. Jon Boyce:

Thank you for your comments to the FAA; they have been noted. Please refer to the following general responses (see Appendix S) that apply to your comments.

**General Response 7-11:   Call for noise curfew/activity restrictions**
-----Original Message-----
From: Cayla.Morgan@faa.gov [mailto:Cayla.Morgan@faa.gov]
Sent: Friday, February 05, 2010 1:24 PM
To: Waggoner, Dave; Dolan, Bill; Ryk Dunkelberg; Ryan Hayes
Cc: Patricia.Deem@faa.gov; Caroline.CTR.Poyurs@faa.gov;
    Roland.J.McKee@faa.gov
Subject: Fw: Paine Field

Cayla Morgan
Environmental Protection Specialist
Seattle Airports District Office
Federal Aviation Administration
425-227-2653

----- Forwarded by Cayla Morgan/ANM/FAA on 02/05/2010 12:23 PM -----
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B.150
Paine Field airport having a runway not being utilized at full potential for commercial passenger airlines makes as much sense to me as:

1) The state closing the floating bridges and telling the drivers to drive around. They say that using the bridges would save time and money and headaches for the drivers, but who cares, they will get over it.

2) Next while they are at it let's close down I-5 freeway state wide, there are arterial streets drivers can use from Oregon to the Canadian border. It might put the west side of the state in a little bind but just think how quiet it would be for the whiners that live earshot of the I-5 corridor. Now that's what really counts!

3) Next, the two Everett hospital campuses close their doors and tell the would be customers they can take their business to either The Bellingham or Seattle hospitals if they wish. Reason who needs hospitals in Everett when you have them in Seattle and Bellingham. Genius! What a plan!

If you build a house near a golf course you can expect your property to be pelted by golf balls, if you live next to the river long enough you shouldn't be surprised to end up in it, and if you live by Paine Field Airport you should see planes land and take off, and the more the better, because that is what airports do for crying out loud.

Lewis Boyd
1127 Hoyt Ave.
Everett WA 98201
425 259 3756
Lewisboyd@aol.com

BUY Indiana Jones and the Kingdom of the Crystal Skull on DVD today!
Response to Comment

Dear Lewis Boyd:

Thank you for your comments to the FAA; they have been noted.
From: robtdboyd@aol.com [mailto:robtdboyd@aol.com]
Sent: Friday, January 15, 2010 9:47 PM
To: cayla.morgan@faa.gov
Cc: Air Service Comments; County Executive
Subject: Draft EA - Paine Field

Dear Cayla Morgan

Thank you for the opportunity to comment on the Draft EA issued by the FAA regarding the future of commercial air service from Paine Field in Snohomish County.

I am a resident in an area called Picnic Point which is just South of Paine Field. Obviously, we are concerned that our quality of life and the economic value of our property may be negatively impacted if commercial air service is commenced from Paine Field.

Our view is that the Draft EA, while purporting to address the concerns that we and other residents have, is woefully short of its goal and appears to be a very superficial treatment of this most important subject.

While the immediate impact of a few commercial flights may not be all that significant, the uncontrolled and unabated continuance of additional flights and commercial use of Paine Field appears to be glossed over and not fully analyzed by the Draft EA.

We know many people who live or have lived near Sea-Tac and we definitely do not want to suffer the same fate of having the neighborhood blight and incessant noise that accompanies the life near a commercial airport.

We believe that if a comprehensive Environmental Assessment is conducted, your researchers will come to the same conclusion and recommend against permitting commercial air service from Paine Field.

The areas that need additional and in-depth analysis include the impacts on schools, environmental and health risks to our children, noise impacts from additional flights and from larger aircraft, as well as impact on local traffic.

I travel frequently, and find that using the Sea-Tac airport is very satisfactory. The marginal improvement in convenience for people like me and other Northenders of having a commercial airport in our backyard is simply not worth the negative environmental impact.

We truly hope that our government will listen to the people that are affected. These days there just seems to be so much of government just doing what it wants without listening to the people who provide the financing and are impacted by its actions.

Thank you,

Robert D. Boyd
13402 67th Ave. W.
Edmonds, WA 98026
Dear Robert Boyd:

Thank you for your comments to the FAA, Snohomish County, and Paine Field Airport; they have been noted. Please refer to the following general responses (see Appendix S) that apply to your comments.

**General Response 1-6:** What are the FAA and County roles in this EA and has a decision been made to move forward?

**General Response 1-8:** Adequacy of FAA guidance and use of FAA guidance

**General Response 1-10:** Scope of the EA analysis for future operations and passengers

**General Response 1-11:** Flawed/inadequate/biased EA

**General Response 1-13:** Additional study should be conducted

**General Response 3-5:** Why was 2016 selected as the future year?

**General Response 6-4:** What are the quality of life impacts?

**General Response 9-1:** What is the impact upon property values?
Ray Boyer

From: "Ray Boyer" <ray@rdboyer.com>
To: "Ray Boyer" <ray@rdboyer.com>
Sent: Wednesday, January 20, 2010 11:56 PM
Subject: Fw: Possible Expansion of Paine Field Usage Should be Stopped

Firstly, I support the comments by SOC that I have attached.

I also fully support the comments made by Mayor Joe Marine on behalf of Mukilteo which I have also attached.

Due to time limitations I will only read a letter I sent to the Snohomish County Council, Governor Gregoire, Senator Murray, Senator Cantwell, Congressman Inslee, Mukilteo Mayor, Mukilteo City Council Members, Save Our Communities, and the Snohomish County Executive last night.

I may at a later time submit more comments concerning various factors. I must also add my concern as to what seems to be a very limited amount of time for citizens to research and respond to the EA. Three minutes is too short for verbal responses also. I am thankful my local Mukilteo elected officials and SOC are working on this issue and have dedicated a great deal of time on these issues so that they can better address the many obvious faults of the analysis in the short period of time provided.

Ray Boyer

--- Original Message ---

From: Ray Boyer
To: County,executive@co.snohomish.wa.us; Governor Chris Gregoire; Sullivan, Rep. Brien; U.S. Senator Patty Murray; Barbara Chauhan@co.snohomish.wa.us; kimberly.cole@co.snohomish.wa.us; mike.cooper@co.snohomish.wa.us; Helen.Hambelton@snoco.org; john.koster@co.snohomish.wa.us; dave.gossell@co.snohomish.wa.us; cecilia.wilson@co.snohomish.wa.us; Dave.Somers@co.snohomish.wa.us; Eric.Parks@co.snohomish.wa.us; Marcia.Isenberg@co.snohomish.wa.us;
Cc: Pam.Spampani; remery@ci.mukilteo.wa.us; lgrafer@ci.mukilteo.wa.us; kstoltz@ci.mukilteo.wa.us; Jennifer.Gregerson; Emily.Vanderwiel; Joe Marine; Save Our Communities;
Tinsley@ci.mukilteo.wa.us
Sent: Wednesday, January 20, 2010 10:42 PM
Subject: Possible Expansion of Paine Field Usage Should be Stopped

Hello,

I am writing today since I am deeply upset by the possible expansion of Paine Field to include passenger service.

I am also deeply upset by a very limited, and very flawed, Environmental Assessment concerning that expansion. This EA was funded by the FAA and is now being reviewed and commented on by citizens (the analysis assumes only minimal use of the airport which would actually have no restrictions on usage, making the analysis meaningless even if it were accurate). I believe this EA is wrong in almost every way.

Snohomish County promoted the unincorporated Harbour Pt area to be built with expensive homes and schools adjacent to Paine Field while taking FAA dollars as well as the tax dollars associated with these expensive homes. This area was later annexed into the City of Mukilteo.

This airport expansion will adversely affect the Harbour Pt area and Mukilteo. I believe this affect will be drastic.

I believe this proposed change would lead to diminished home values, diminished quality of life, adversely affect schools and children, adversely affect the environment, adversely affect the health and well being of residents, adversely affect Snohomish County economically by diminished home values, lead to
increased crime, increase traffic congestion, and would hurt Boeing's competitiveness due to increased traffic which could eventually cause them to leave the state. I also believe that this expansion may result in lawsuits against Snohomish County.

I hope that you all will attempt to stop this airport expansion even if it means giving the FAA airport funding money back.

I also believe that this proposed airport expansion will negatively affect Boeing operations due to increased traffic on roads not to mention possible flight delays. This is only one of the many reasons that this expansion should be stopped.

In 2002 then Boeing Commercial Airplane CEO Allan Mulally said that traffic in this area was not competitive. He stated the company may leave Washington to the House Labor Committee sitting traffic as a major concern (see excerpts from articles by Evergreen Freedom Foundation copied at the bottom of my letter along with website references, please note hi-lited phrases concerning transportation).

The large roads that surround the Boeing Everett Plant promote Boeing's competitiveness by minimizing delays and the cost of shipping. That incentive for Boeing should not be traded for the convenience of a few who don't want to travel one hour to Sea-Tac Airport or for a few low paying jobs associated with the expansion of the airport useage! In fact, Boeing has contributed funding on many of the nearby road projects themselves.

From a Herald article written on April 10, 2009 aerospace represents a $36 billion industry for Washington. Boeing is Snohomish County's largest employer, making up nearly 22 percent of the county's wages.

The state just provided Boeing 3 billion dollars in incentives to make our state more competitive and to ensure Boeing would stay in Washington. Now this airport expansion, if allowed to happen, will help make Boeing less competitive due to increased traffic surrounding Boeing's largest plant in the state.

Please support Paine Field being classified as an airport of "special national significance" (commonly known as the "Centennial Rule"). This designation would allow the airport to collect federal aviation improvement funding while controlling the types of service at the airport and thereby promote Boeing's competitiveness.

Please don't trade high paying Boeing jobs for a few airport passenger service jobs! Please don't trade export jobs for service jobs.

Please stop this airport expansion.

Sincerely,

Ray Boyer
10603 56th Ave W
Mukilteo, WA 98275


Testifying before the House Labor Committee on January 16, 2002, Boeing CEO Alan Mulally repeatedly told legislators that Washington is not competitive in the following six areas:
Transportation, taxes, energy, education, unemployment insurance, and regulations/permitting.
Mulally’s concerns extended far beyond the state’s transportation problems. In no uncertain terms, Mulally informed the committee they are free to resolve the state’s business climate or maintain the status quo, but he **reminded them that Boeing is also free to leave the state if improvements are not made.**

Testimony excerpts:

"It was a phenomenal set of data. And I'm sure that you have this data... In every one of these categories, those top six, the state of Washington was not competitive. So to answer your question, in every one of those areas, the state of Washington is not competitive. Let me say it again. In every one of these areas the state of Washington is not competitive, meaning it costs us more to operate in the State of Washington. In some of the states they're like 27th. We're 27th, 27th or 43rd or whatever. This is not Boeing, these are economists looking at the data, looking at the operation, looking at our structure, looking at how we invest, looking at how we finance the place. So I think that was in denial. I think that we, we, we don't get it, that we have to be competitive to operate in this world. And if we can't produce products and services and we can't be competitive doing it, it's ok, it should go to somewhere else. We believe in market-based economies. We believe in capitalism. We believe that the producer of products and services should go to the people that make products and services that people want around the world and they can do it more efficiently than some one else. So, my thought about your question is, that we, the citizens of the State of Washington have some big decisions to make. Are we going to move up in competitiveness in everyone of these categories, and if we're not we'll know it. You don't have to say anything. We don't have to say anything to each other. We will keep moving to a world where we can operate as a business. That's not personal. It's not personal: this is what we believe in, this is what the United States is based upon. So my answer is, let's look at the data. What Mark just talked about, about transportation, that's one little piece of transportation. I have the coolest video I want to show you that shows an airplane coming together. And you should see the magic of the State of Washington: the harbor, the trains, the roads, the airport. Four million parts arrive here in Seattle and go together as an airplane and leave to go out and to fly around the world, and all this infrastructure is the essence of our cost structure. And if we don't make this competitive, and if the data sets us free. The data says we're not competitive and we're going to do whatever it takes, will help as a citizen of the State of Washington, will help everywhere we can, but we have a fiduciary responsibility to our employees, to the customers, to the communities in which we operate, and to our shareholders, that we have to be competitive. And every sale that we lose means for some reason we are not competitive. So my answer, representative, is those six categories there, they're in the Washington State Competitiveness Council. We've looked at the data, the economists have looked at it, but we are not competitive. Right?"

"My dream is, if we work these together, I would love to see the headquarters of commercial airplanes and the majority of the Boeing operation leading in this thing done like is today. But again to answer your question, if we can't make progress on this then we need to just go ahead and take subsequent action. But I think it's just talking about it and clarifying and moving forward together."

"But look at the transportation system. Watch every movement and then when you're working next week you're going to feel so good about your work, to find a way to work on all six of those things, not just the transportation, so this is for you, this is what you're about."

Boeing executives make no bones about it: Washington is not a competitive place for them to do business, and if lawmakers do not resolve the state’s anti-business climate the company will pull out entirely.

In a January 16th testimony before the House Labor Committee, Boeing CEO Alan Mulally echoed the findings of EFF’s recently published Business Matters series: Washington’s business policies stifle, rather than stimulate, the market and economy.

Mulally zeroed in on six specific areas: transportation, taxes, energy, education, unemployment insurance, and regulations. His words could not be more clear:

"[I]n every one of these categories, the state of Washington is not competitive. . . . So to answer your question, in every one of those areas, the state of Washington is not competitive. Let me say it again. In every one of these areas, the state of Washington is not competitive. Meaning it costs us more to operate in the state of Washington."

Mulally’s comments should not be taken as a threat, but rather a statement of reality in a free-market economic system. Mulally continued,

"We believe in market-based economies. . . . we, the citizens of the state of Washington, have some big decisions to make. Are we going to move up in competitiveness in every one of these categories? . . . if we’re not, we’ll know it. You don’t have to say anything. We don’t have to say anything to each other. We will keep moving to a world where we can operate as a business. . . . It’s not personal. . . . This is what the United States is based upon.
"
". . . [W]e have a fiduciary responsibility. To our employees, to the customers, to the communities in which we operate, and to our shareholders. . . . we have to be competitive."
Response to Comment

Dear Ray Boyer:

Thank you for your comments to Snohomish County; they have been noted. Please refer to the following general responses (see Appendix S) that apply to your comments.

General Response 1-1: Why can't the County limit or restrict operations?
General Response 1-2: What is the Centennial rule? Does it apply here?
General Response 1-11: Flawed/inadequate/biased EA
General Response 1-12: Adequacy of public involvement and release of the Draft EA and Public Hearings
General Response 2-2: Boeing reaction to the Proposed Project and effect of the Project on Boeing
General Response 3-5: Why was 2016 selected as the future year?
General Response 6-1: Significance of Project Effects
General Response 7-7: Noise impacts on schools
General Response 9-1: What is the impact upon property values?
General Response 9-6: What is the impact of the project on crime?
General Response 9-8: What are the health and quality of life effects associated with the project?
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I am also deeply upset by a very limited, and very flawed, Environmental Assessment concerning that expansion. This EA was funded by the FAA and is now being reviewed and commented on by citizens (the analysis assumes only minimal use of the airport which would actually have no restrictions on usage making the analysis meaningless even if it were accurate). I believe this EA is wrong in almost every way.

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I believe this proposed change would lead to diminished home values, diminished quality of life, adversely affect schools and children, adversely affect the environment, adversely affect the health and well being of residents, adversely affect Snohomish County economically by diminished home values, lead to increased crime, increase traffic congestion, and would hurt Boeing's competitiveness due to increased traffic which could eventually cause them to leave the state. I also believe that this expansion may result in lawsuits against Snohomish County.

I hope that you all will attempt to stop this airport expansion even if it means giving the FAA airport funding money back.

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The state just provided Boeing 3 billion dollars in incentives to make our state more competitive and to ensure Boeing would stay in Washington. Now this airport expansion, if allowed to happen, will help make Boeing less competitive due to increased traffic surrounding Boeing's largest plant in the state!

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Please stop this airport expansion.

Sincerely,

Ray Boyer
10603 56th Ave W
Mukilteo, WA 98275
Testifying before the House Labor Committee on January 16, 2002, Boeing CEO Alan Mulally repeatedly told legislators that Washington is not competitive in the following six areas: Transportation, taxes, energy, education, unemployment insurance, and regulations/permitting. Mulally's concerns extended far beyond the state's transportation problems. In no uncertain terms, Mulally informed the committee they are free to resolve the state's business climate or maintain the status quo, but he reminded them that Boeing is also free to leave the state if improvements are not made.

Testimony excerpts:
"It was a phenomenal set of data. And I'm sure that you have this data... In every one of these categories, those top six, the state of Washington was not competitive. So to answer your question, in every one of those areas, the state of Washington is not competitive. Let me say it again. In every one of these areas the state of Washington is not competitive, meaning it costs us more to operate in the State of Washington. In some of the states they're like 27th. We're 27th, 27th or 43rd or whatever. This is not Boeing, these are economists looking at the data, looking at the operation, looking at our structure, looking at how we invest, looking at how we finance the place. So I think that were in denial. I think that we, we, we don't get it, that we have to be competitive to operate in this world. And if we can't produce products and services and we can't be competitive doing it, it's ok, it should go to somewhere else. We believe in market-based economies. We believe that the producer of products and services should go to the people that make products and services that people want around the world and they can do it more efficiently than some one else. So, my thought about your question is, that we, the citizens of the State of Washington have some big decisions to make. Are we going to move up in competitiveness in everyone of these categories, and if we're not we'll know it. You don't have to say anything. We don't have to say anything to each other. We will keep moving to a world where we can operate as a business. That's not personal. It's not personal: this is what we believe in, this is what the United States is based upon. So my answer is, let's look at the data. What Mark just talked about, about transportation, that's one little piece of transportation. I have the coolest video I want to show you that shows an airplane coming together. And you should see the magic of the State of Washington: the harbor, the trains, the roads, the airport. Four million parts arrive here in Seattle and go together as an airplane and leave to go out and to fly around the world, and all this infrastructure is the essence of our cost structure. And if we don't make this competitive, and if the data sets us free. The data says we're not competitive and we're going to do whatever it takes, will help as a citizen of the State of Washington, will help everywhere we can, but we have a fiduciary responsibility to our employees, to the customers, to the communities in which we operate, and to our shareholders, that we have to be competitive. And every sale that we lose means for some reason we are not competitive. So my answer, representative, is those six categories there, they're in the Washington State Competitiveness..."
Council. We've looked at the data, the economists have looked at it, but we are not competitive. Right?"
"My dream is, if we work these together, I would love to see the headquarters of commercial airplanes and the majority of the Boeing operation leading in this thing done like is today. But again to answer your question, if we can't make progress on this then we need to just go ahead and take subsequent action. But I think it's just talking about it and clarifying and moving forward together."
"But look at the transportation system. Watch every movement and then when you're working next week you're going to feel so good about your work, to find a way to work on all six of those things, not just the transportation, so this is for you, this is what you're about."

Another article concerning Boeing and traffic (http://www.effwa.org/main/article.php?article_id=107)

**Boeing executives make no bones about it: Washington is not a competitive place for them to do business, and if lawmakers do not resolve the state’s anti-business climate the company will pull out entirely.**

In a January 16th testimony before the House Labor Committee, Boeing CEO Alan Mulally echoed the findings of EFF’s recently published Business Matters series: Washington’s business policies stifle, rather than stimulate, the market and economy.

**Mulally zeroed in on six specific areas: transportation, taxes, energy, education, unemployment insurance, and regulations. His words could not be more clear:**

"[I]n every one of these categories, the state of Washington is not competitive. . . . So to answer your question, in every one of those areas, the state of Washington is not competitive. Let me say it again. In every one of these areas, the state of Washington is not competitive. Meaning it costs us more to operate in the state of Washington."

Mulally’s comments should not be taken as a threat, but rather a statement of reality in a free-market economic system. Mulally continued,

"We believe in market-based economies. . . . we, the citizens of the state of Washington, have some big decisions to make. Are we going to move up in competitiveness in every one of these categories? . . . if we’re not, we’ll know it. You don’t have to say anything. We don’t have to say anything to each other. We will keep moving to a world where we can operate as a business. . . . It’s not personal. . . . This is what the United States is based upon.
". . . [W]e have a fiduciary responsibility. To our employees, to the customers, to the communities in which we operate, and to our shareholders. . . . we have to be competitive."
Dear Ray Boyer:

Thank you for your comments to Snohomish County and Paine Field Airport; they have been noted. Please refer to the following general responses (see Appendix S) that apply to your comments.

**General Response 1-1:** Why can't the County limit or restrict operations?
**General Response 1-2:** What is the Centennial rule? Does it apply here?
**General Response 1-11:** Flawed/inadequate/biased EA
**General Response 2-2:** Boeing reaction to the Proposed Project and effect of the Project on Boeing
**General Response 3-5:** Why was 2016 selected as the future year?
**General Response 6-1:** Significance of Project Effects
**General Response 6-4:** What are the quality of life impacts?
**General Response 7-7:** Noise impacts on schools
**General Response 9-1:** What is the impact upon property values?
**General Response 9-6:** What is the impact of the project on crime?
**General Response 9-7:** Project will bring in lower income people and low paying jobs
**General Response 9-8:** What are the health and quality of life effects associated with the project?
From: Waggoner, Dave [mailto:Dave.Waggoner@co.snohomish.wa.us]
Sent: Tuesday, December 08, 2009 3:35 PM
To: Air Service Comments
Subject: FW: Paine Field Commercial Air Service Environmental Assessment

From: Stan Bradshaw [mailto:StanB@co.island.wa.us]
Sent: Monday, December 07, 2009 10:26 AM
To: Waggoner, Dave
Subject: RE: Paine Field Commercial Air Service Environmental Assessment

Dave,
Not sure how the procedure is to respond, but “Aye” or “yes” for the two proposals would be my response. Having been up to Bellingham a few times picking up and dropping off, I don’t think what is proposed will be too noisy for the area. It can’t be any noisier than a 747 run up. And it’s sure as heck not as noisy as the OLF’s EA-18’s. JEEZ those flyovers will knock your fillings loose.

REALLY enjoyed the military airshow and fly-in back in September. Frank and I were there most of the day Saturday. We got a couple of great pictures of the PBY water drop. I’ve attached one here for you.

Good luck with all this.

Paula and I are still employed so far. The County employees have really taken things on the chin lately. It’s no fun anymore here.

And cold today too!

Stan

From: Waggoner, Dave [mailto:Dave.Waggoner@co.snohomish.wa.us]
Sent: Friday, December 04, 2009 5:22 PM
To: Shaliza Damji(shaliza@360hotelgroup.com); Shammi_Ratti@URSCorp.com; Sharon Danitschek (sharon@360hotelgroup.com); Shawn Bills (shawn_bills@murray.senate.gov); Shawn Walker (shawn@360hotelgroup.com); Sheri.Kasen@faa.gov; Sherry Smith; Stan Bradshaw; Stephen Bucy; SKiehl@psrc.org; Steve Pottle (stevepottle@comcast.net); Steven Friedmann (sfriedmann@castlecooke.com); Tamara Orr; Theodore Lane; Terri Wengjen (terri.wengjen@allegiantair.com); taa@flytupelo.com; terry.neil@neuvant.com; Terry Wilcoxson (terry@castlecooke.com); walst@foster.com; Tim Adamson (oh58@verizon.net); TimT@portofbremerton.org; twdore@yahoo.com; Timothy.Nowlis@PSS.Boeing.com; todd@echelbarger.com; Todd Woodward (Todd.woodard@spokaneairports.net); tom@arnotlaw.com; tcathcart@Museumofflight.org; thomasfitz@comcast.net; tom@talmadgelg.com
Subject: FW: Paine Field Commercial Air Service Environmental Assessment

A draft environmental assessment under the National Environmental Policy Act on two proposals to initiate commercial air service at Paine Field was released Friday for public review and comment.
The environmental review was conducted in response to two requests to begin commercial air service at Paine Field received by Snohomish County in 2008. Although Snohomish County Executive Aaron Reardon and some County Council members have said they do not support commercial air service at Paine Field, federal law obligates the county to accommodate commercial service. Federal law does not allow the county to prohibit or limit scheduled passenger air service. Instead, it requires that the county negotiate with the airlines in good faith to accommodate their proposed service.

Horizon Airlines has indicated it wants to operate four times a day to Portland and twice per day to Spokane, using 75-seat Bombardier Q400 turboprop airplanes on both routes. Allegiant has said it plans to operate twice a week to Las Vegas, using 150-seat MD83 jet aircraft.

Before airlines may begin commercial service, the FAA must amend the county’s operating certificate for Paine Field as well as the airlines’ operating specifications. The county was required to prepare the environmental assessment for FAA approval before those amendments can occur. The preparation of the environmental assessment was funded by an FAA grant and by the time reviews are finished is expected to have cost more than $450,000.

Key points of the draft environmental assessment include:

1. Considering all current aircraft operations (take offs and landings) at Paine Field, federal noise thresholds are not expected to be exceeded by these additional flights.

2. Traffic mitigation fees will be required, though expected increases in vehicular traffic at Paine Field will not cause any Snohomish County arterials or Mukilteo, Washington State DOT, or Everett intersections to change to a deficient level of service.

3. Emissions affecting air quality will be minimal and below federal impact thresholds.

The draft environmental assessment is available for review at the airport office, on the Paine Field Web site [http://www.painefield.com/airserviceea.html](http://www.painefield.com/airserviceea.html), at [www.snoco.org/departments/airport](http://www.snoco.org/departments/airport) and also in local public libraries.

The public now has the opportunity to review and comment on the draft environmental assessment before a final determination is made by the FAA. Comments may be submitted by email to cayla.morgan@faa.gov or airserviceeacomments@snoco.org.

Comments sent by mail should be addressed to:

1. Cayla Morgan, Environmental Protection Specialist, Seattle Airports District Office, Federal Aviation Administration, 1601 Lind Avenue S.W., Renton, WA 98057-3356.

2. Dave Waggoner, Director, Snohomish County Airport, 3220 100th Street S.W., Suite A, Everett, WA 98204.

The deadline for comments is January 15, 2010.
Comments also can be submitted in person during two scheduled public meetings. Public meetings have been scheduled for Monday, Jan. 4, 2010, at Meadowdale High School in Lynnwood, and Tuesday, Jan. 5, 2010, at the Snohomish County PUD Auditorium in Everett.

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A moderator will conduct the public hearings, during which citizens will be allowed three minutes per person to comment, or written comments can be submitted. A stenographer will transcribe citizens’ comments. The FAA will review and issue an environmental finding once the county submits the final NEPA environmental assessment. That final document will include any comments submitted on the draft document.

Peter Camp  
Snohomish County  
Executive Director  
Direct: 425.388.3123  
Mobile: 425.754.8088  
Fax: 425.388.3434  
Peter.Camp@co.snohomish.wa.us
Response to Comment

Dear Stan Bradshaw:
Thank you for your comments to Paine Field Airport; they have been noted.
-----Original Message-----
From: Cayla.Morgan@faa.gov [mailto:Cayla.Morgan@faa.gov]
Sent: Wednesday, January 06, 2010 12:29 PM
To: Waggoner, Dave; Dolan, Bill; Ryk Dunkelberg; Ryan Hayes
Cc: Patricia.Deem@faa.gov; Caroline.CTR.Poyurs@faa.gov;
Roland.J.McKee@faa.gov
Subject: Fw: painefield

Cayla Morgan
Environmental Protection Specialist
Seattle Airports District Office
Federal Aviation Administration
425-227-2653

----- Forwarded by Cayla Morgan/ANM/FAA on 01/06/2010 11:28 AM -----

jim brandley <js.brandley@gmail.com> wrote on 01/05/2010 01:01:42 PM:

> [image removed]
> >
> > painefield
> >
> > jim brandley
> >
> > to:
> >
> > Cayla Morgan
> >
> > 01/05/2010 01:02 PM
> >
> > I am in favor of allowing commercial air services at Paine Field. I
> > know have to drive to SeaTac or Bellingham for air service. I
> > believe this would benefit the county, help reduce traffic and save
> > fuel. It seems like a small minority want to block this
> > Thank You
> > Jim Brandley
> > 10630 32nd dr se
> > everett 98208
> >
> >
Dear Jim Brandley:

Thank you for your comments to the FAA; they have been noted.
I would like to submit my comments to the Draft EA regarding commercial air service at Paine Field, located in Everett, WA. With the expected growth in the greater Puget Sound Region, the current commercial air facilities available will not keep up with the growth or demand, even with the expansion of Sea-Tac International. The reality of the situation is that this need will have to be met. To meet this need, I see four options:

**Option 1** - Do nothing, essentially the status quo to current commercial air service in the Puget Sound region

**Option 2** - Expand facilities such as Arlington Airport or Harvey Field (in Snohomish) to allow commercial air service

**Option 3** - Create a new airport "from scratch" in the north Puget Sound area

**Option 4** - Allow commercial air service at Paine Field

**Option 1** does not seem feasible, as it will likely overburden Sea-Tac and create more traffic on the roads, specifically for those living north of Seattle who must continue travelling on our already congested highways. This will create more automobile pollution and lower air quality for the entire Puget Sound Region. Similarly, expanding Sea-Tac is not an option, as it will require a steep environmental cost due to the lack of available land to expand.

**Option 2** I do not see as feasible. Available land does not exist to create the necessary space for commercial air service at either of these airports. An effort to expand Arlington Airport years ago failed in part because of this. Harvey Field is located in a flood plain, and thus, any effort to expand this site would require an extensive cost to mitigate the environmental impact through such expansion. Neither of these airports has the infrastructure such as roads or sewer/water service such an expansion would require. Nearby streams and waterways would be negatively impacted.

**Option 3** is out of the question. There is no amount of land available in an urban area in northern Puget Sound to create a new airport. Cutting down trees or filling in wetlands to build an airport "from scratch" is something I adamantly oppose. Likewise, the amount of infrastructure that would be required would be very costly.

**Option 4**, thus is the only option I see as viable and allowable. The reality of the situation is that expanded commercial air service is needed to accommodate the nearly 1.5 million more residents expected to move to the area over the next 15 to 20 years, much of which is expected to call Snohomish County home. Paine Field is not to become "Sea-Tac North", as many seem to imply. The airlines in question are requesting limited regional air traffic. Paine Field is a facility that is currently used for air traffic. Infrastructure costs would be the lowest of the four options, requiring at most minimal road, water/sewer, and other improvements. Paine Field is located in the heart of an urban area, which appears to support the goals of our state's Growth Management Act. The cost to the environment also would be most minimized with this option, again, because an existing airport would be utilized, rather than expanding existing facilities or creating one from scratch.
I consider myself to be one who very strongly supports protecting the environment. I also consider myself to be a pragmatist. It would be great to continue with the status quo, and maintain the current way of life, but that is not the reality. We must make the difficult and responsible choice that is best for the entire Puget Sound region, and not just what is best for a limited scope of geography.

Will Brandt
Lake Stevens, WA
Response to Comment

Dear Will Brandt:

Thank you for your comments to the FAA and Paine Field Airport; they have been noted.
-----Original Message-----
From: Cayla.Morgan@faa.gov [mailto:Cayla.Morgan@faa.gov]
Sent: Thursday, February 04, 2010 6:57 PM
To: Waggoner, Dave; Dolan, Bill; Ryk Dunkelberg; Ryan Hayes
Subject: Fw: Airservice at Paine Field

Cayla Morgan
Environmental Protection Specialist
Seattle Airports District Office
Federal Aviation Administration
425-227-2653

Forwarded by Cayla Morgan/ANM/FAA on 02/04/2010 05:56 PM

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Please proceed with air service additions at Paine Field. There are a lot of "Old Folks" in Edmonds that didn't even want cars on their streets. They are only interested in maintaining their hanging flowers on the streets and keeping business out of Edmonds. The City Council bows to these folks to try and keep Edmonds out of the 21st and even the 20th centuries. Please bring commercial air to Paine Field.

Leigh E. Brendemuhl
7106 177th St SW
Edmonds, WA 98026-5621
425-745-6796
Response to Comment

Dear Leigh Brendemuhl:

Thank you for your comments to the FAA; they have been noted.
Cayla Morgan  
Environmental Protection Specialist  
Seattle Airports District Office  
Federal Aviation Administration  
425-227-2653  
----- Forwarded by Cayla Morgan/ANM/FAA on 01/06/2010 12:09 PM -----  

james brink <jsiggyb@verizon.net> wrote on 01/05/2010 07:22:33 PM:

> [image removed]
> 
> Paine Field
> 
> james brink
> 
> to:
> 
> Cayla Morgan
> 
> 01/05/2010 07:22 PM
> 
> Dear Cayla - I would like you to be aware of my support of commercial airline use at Paine Field. I am a long-time home owner (29 years) from the Silver Lake area of South Everett. I feel that Paine Field has long been an un-tapped public resource in our neighborhood. It would be wonderful to catch a flight from Paine Field instead of having to drive to Sea-Tac. The time and money saved is a benefit in many ways. I can't think of any negatives to changing the status of Paine Field to a commercial airport.
> 
> Please do all you can to make Paine Field a commercial airport that can be enjoyed by all.
> 
> Thank you -
> 
> Jim Brink
> 
> Everett, Wa.
Dear Jim Brink:

Thank you for your comments to the FAA; they have been noted.
-----Original Message-----
From: Cayla.Morgan@faa.gov [mailto:Cayla.Morgan@faa.gov]
Sent: Monday, February 01, 2010 4:39 PM 
To: Waggoner, Dave; Dolan, Bill; Ryk Dunkelberg; Ryan Hayes 
Subject: Fw: Paine Field - Support for Commercial flights

Cayla Morgan
Environmental Protection Specialist
Seattle Airports District Office
Federal Aviation Administration
425-227-2653

-----Forwarded by Cayla Morgan/ANM/FAA on 02/01/2010 03:38 PM-----
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| To: 
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| "Brotten, David W" <Dave.Brotten@Keane.com>
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| Cayla Morgan/ANM/FAA@FAA
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| Date: 
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| 01/28/2010 06:17 PM
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| Subject: 
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|
| Paine Field - Support for Commercial flights
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B.180
I am a resident the Everett area and I support commercial flights to and from Paine Field. I periodically fly to southern California and wonder why they have so many small convenient airports while we only have the one big one that is an hour drive away for me. It would be great if there was an ability to fly from Snohomish County to other locations. While the plan is starting small with only a few flights a day, it would be great if there came a day when 20 commercial flights a day would be available from Paine Field, and I only hope that some day I am able to take advantage of living so close to an airport. I live near the flight path on the water looking south across the bay toward Paine Field. While I do hear the planes overhead, it has never been a bother to me, and I consider it enjoyable watching the world go by. I fully support commercial air travel from Paine Field, and when I hear the statistics about how many take offs and landings occur at the airport today and the small difference a few flights a day would make, it is unbelievable we have people complaining. To the local residents who complain the loudest, the airport was there when they purchased their home, they should have picked a different area if they did not want to hear a plane overhead.

Thanks

DAVE BOTTEN
Tulalip Washington

Disclaimer: This email message and any attachments are for the sole use of the intended recipient(s) and may contain information that is confidential, legally privileged or otherwise exempt from disclosure under applicable law. If you are not the intended recipient(s) or have received this message in error, you are instructed to immediately notify the sender by return email and required to delete this message from your computer system. This communication does not form any contractual obligation on behalf of the sender, the sender's employer or such employer's parent company, affiliates or subsidiaries.
Dear David Brotten:

Thank you for your comments to the FAA; they have been noted.
I am a resident of Mukilteo and would like to submit my comments for the hearing to be held at Kamiak High School.

I reject any commercial service at Paine Field. The environmental assessment does not take the community into consideration. If anyone has ever been in the QFC Shopping Center when even the small plane comes in it is deafening. The planes also have to come in very low right over the Shopping Center and residential area. A plane accident would be devastation for the people on the ground. The noise level would make Mukilteo an undesirable place to live.

"The horse will be out of the barn", if you start with just a few flights a day. First thing we know it will not be profitable and they will want to add more airlines, flights, and wanting more land, and want Boeing property (and they will sell and take off for other states), they will also be taking neighborhoods. We don't want to become a Sea-Tac with the problems and crime that goes with it. You don't see million dollar homes around airports!

Please take my comments into consideration in all phases of deliberations concerning commercial air service at Paine Field.

Arlene Brovald
5600 Harbour Pt. Blvd.
#2-102
Mukilteo, WA 98275
Dear Arlene Brovald:

Thank you for your comments to the FAA and Paine Field Airport; they have been noted. Please refer to the following general responses (see Appendix S) that apply to your comments.

- **General Response 2-2:** Boeing reaction to the Proposed Project and effect of the Project on Boeing
- **General Response 3-1:** What is the purpose and need for the action or project?
- **General Response 3-5:** Why was 2016 selected as the future year?
- **General Response 3-14:** What actions will require additional environmental review?
- **General Response 5-1:** Existing aircraft noise concerns
- **General Response 6-1:** Significance of Project Effects
- **General Response 6-4:** What are the quality of life impacts?
- **General Response 7-3:** Noise analysis methodology
- **General Response 9-6:** What is the impact of the project on crime?
- **General Response 11-5:** What are the health impacts compared to safety?
Cayla Morgan  
Environmental Protection Specialist  
Seattle Airports District Office  
Federal Aviation Administration  
1601 Lind Ave. SW  
Renton, WA 98057-3356  

January 5, 2010

Re: Paine Field

We are extremely opposed to commercial flights at Paine Field. The expensive study was too limited in scope. The fact is, once a "few flights," as detailed in the study begin, it opens up our airways to a huge increase in noise, traffic and environmental damage.

We support the current usages at Paine Field.

As life-long residents of the Puget Sound area we are personally able to attest to the damages of living under airplane flight paths, flying commercially day and night. Our education was interrupted, and our homes overcome with noise.

Please reconsider this issue. The opening of light rail to SeaTac and building the line further north will make the "convenience" factor of Paine Field a hollow assertion in the near future.

Lois Jean Brown  
Bruce B. Brown

312 Cornelia Avenue  
Mukilteo, WA 98275  

Lois Jean Brown  
Bruce B. Brown
Dear Lois Jean & Bruce Brown:

Thank you for your comments to the FAA; they have been noted. Please refer to the following general responses (see Appendix S) that apply to your comments.

General Response 1-10: Scope of the EA analysis for future operations and passengers
General Response 3-5: Why was 2016 selected as the future year?
General Response 3-14: What actions will require additional environmental review?
General Response 4-5: Other modes of transportation may be better alternatives
General Response 5-1: Existing aircraft noise concerns
General Response 6-1: Significance of Project Effects
General Response 7-3: Noise analysis methodology
General Response 8-1: Traffic analysis
Here are my comments about the proposed expansion of commercial flights at Paine Field. As a lifelong resident living within 3 miles of the airport, I have been shocked at the amount of development in the newly expanded "Harbour Pointe" (no harbor or point there) area, not to mention the congestion of local roads not improved in the recent decade. The bike lanes and central dividers do nothing to improve actual traffic flow. It is not so much the noise from aircraft above, nor the risk of catastrophe upon approach or landing, but the increased congestion on our already choked up roads between 2 and 6 pm that I am sure will come with expanded use of the airport. The Boeing use of the field does not entail additional traffic on area roads, whereas commercial flights certainly will. Thanks for your time.
Dear Rafa Brown:

Thank you for your comments to Paine Field Airport; they have been noted. Please refer to the following general responses (see Appendix S) that apply to your comments.

**General Response 5-4:  Existing Traffic**

**General Response 8-1:  Traffic analysis**
February 3, 2010

Mr. Dave Waggoner  
Director, Snohomish County Airport  
3220 100th Street SW  
Everett, WA 98204

Re: Paine Field, Draft Environmental Assessment, December, 2009

Dear Mr. Waggoner:

My wife and I are residents of the Wind and Tide community.

When I was in law school at the University of Washington, I worked with a Japanese attorney who was involved in airport noise litigation against government authorities at the Narita Airport near Tokyo which was then a new airport replacing an older airport. I researched litigation records against government agencies in this country, including O’Hare Airport in Chicago, Logan Airport in Boston, SeaTac Airport in this area, and others. As part of that research, I reviewed extensive materials in each of the litigation records which documented substantial compensation paid by government agencies to hundreds of property owners as a result of their diminished property values because of airport noise.

One summer when I was in law school I also had the opportunity to work at the Seattle office for the Environmental Protection Agency. I became familiar with environmental issues that sometimes are not fully appreciated in arguments for short-term economic benefits.

I do not currently practice in government agency litigation or environmental law, but as a citizen of Snohomish County, I am deeply concerned that the Draft Environmental Assessment for December, 2009, ignores the perils of further development of Paine Field. The assessment section on airport noise does not adequately interpret the effects of myopic planning and ill-defined hopes for short-term economic gain that will dramatically change the quality of life in our community.

Those who favor short-term economic benefits of a few arrangements for increased air traffic are ignoring the long-term possibility of protracted litigation about decreased property values that will cost taxpayers and the Snohomish County Airport. The Draft Environmental Assessment ignores any discussion about potential litigation, diminished tax revenues, and a skewed economic model to favor Paine Field business development to the detriment of other businesses in the area who are not related to Paine Field business.
In addition, those who live in outlying areas away from Paine Field, such as Mill Creek or Everett, will no doubt be someday surprised to learn in the future that the pathway for airplanes to land require those planes to “drop down” from their flight path well before the planes are ready to land. One can easily take a survey of those who live in Laurelhurst or Mercer Island in Seattle to understand their continuing objections to airport noise in their areas for airplanes landings at Sea Tac. The Draft Environmental Assessment ignores any discussion about the “drop down” effect and assumes that any environmental impacts are limited to the immediate vicinity of Paine Field.

Make no mistake. The actions you are taking will be remembered for future generations, but not for the reasons you think. To the extent that you ignore what citizens are saying, your planning is flawed since it fails to reasonably consider contrary points of view—And that will only increase continuing opposition to all you do for now and the future.
Sincerely,

Ronald G. Brown
6626 128th Street SW
Edmonds, WA 98026
Dear Ronald Brown:

Thank you for your comments to Paine Field Airport; they have been noted. Please refer to the following general responses (see Appendix S) that apply to your comments.

**General Response 1-8:** Adequacy of FAA guidance and use of FAA guidance

**General Response 1-15:** EA did not reflect the opposition of the community

**General Response 6-3:** What are the project benefits?

**General Response 6-4:** What are the quality of life impacts?

**General Response 9-1:** What is the impact upon property values?

**General Response 9-3:** Socioeconomic Impacts

Please also refer to the following individual response.

“Drop Down” Effect:

The Integrated Noise Model (INM) models aircraft on approach to an airport on a standard three degree angle of approach. Aircraft fly a standard angle of approach to intercept the Instrument Landing System (ILS) which gives aircraft lateral and vertical guidance for landing. All visual and instrument approach aids for large aircraft landing at Paine Field are set at 3 degrees.

Arriving aircraft are directed by air traffic control when to begin the initial decent to an airport. As aircraft descend from cruising altitude, they typically descend in a stair-step fashion by descending to an altitude, remaining at that altitude until cleared by air traffic control to continue to a lower altitude.

It is possible that at some point in the future, a continuous descent approach may be used. This procedure allows for a continuous approach (instead of the step-wise drop downs currently used). Continuous descent approaches are intended to reduce noise and fuel burn.
Dear Mr. Dave Wagner:

Planes are going to be running off the mountains. Will you tell them to drive to Las Vegas? NO

If the airline is up and running and you had clearance, how many flights would be flying to the Olympics?

Although people wanted to fly to the Rose Bowl, you would have them away.

You would never let them fly any flights to L.A. or San Francisco.

The first flights will begin in April 1st.

The lobbyist have to sell their money.

You’ve done the Democratic thing. Rushed the Public to their opinion before telling them what you will do (which) will be before the end of February.

Sincerely

[Signature]
Dear Samantha Brown:

Thank you for your comments to Paine Field Airport; they have been noted. Please refer to the following general responses (see Appendix S) that apply to your comments.

**General Response 1-6:** What are the FAA and County roles in this EA and has a decision been made to move forward?

**General Response 3-14:** What actions will require additional environmental review?
I would like to show my support for the introduction of commercial flights from Paine Field and address some of the comments made by the SOC members:

- You keep talking about what a "beautiful community" we have here in Mukilteo but it isn’t the community I grew up loving. I could drive from the original Mukilteo to downtown Edmonds without seeing a strip mall, traffic light or billboard. Your developer wasn’t concerned about my "quality of life" when he bulldozed down the woods and built several hundred over-priced energy guzzling houses, exploding my property taxes while he walked away with record profits.
- You are afraid it will turn into "SeaTac North"? Been on the speedway at 4:pm lately? How many strip malls do you count between the ferry and Hiway 99? We have our message parlors, too, just a bit more discrete. Motels and hotels? Count them too.
- You degrade the aircraft industry but it helps pay our taxes, creates jobs and supports our community in general. When Boeing sneezes we all reach for a tissue!
- I have always loved the fact that I can look up from my backyard and see just about any aircraft, any type, any size built in any era flying overhead. It contributes to the interest and uniqueness of my neighborhood.

So welcome Horizon and Allegiant to our community. I will do my best to be on the first flight out, since I would love to see Las Vegas but can’t see spending more time getting to the airport than I spend flying to my destination.

Thank you for the opportunity to share my thoughts,
Terry Brown
k.brownterry@comcast.net
Dear Terry Brown:

Thank you for your comments to the FAA and Paine Field Airport; they have been noted.
Amy Ockerlander
Executive Analyst
Snohomish County Executive Office
3000 Rockefeller, M/S 407
Everett, WA 98201-4046
Dir. Phone: 425-388-3090
Main Phone: 425-388-3480
Fax: 425-388-3434
Email: amy.ockerlander@snoco.org
www.snoco.org

Rainier F. Butler
Information Technology Planner 4
Snohomish County Department of Information Services
425.388.7021

General Email Request

Contact Name
no name provided
Contact Phone
no phone provided
Contact Email
brownjkl@msn.com
Contact By
contact by email
Page Viewed
http://www1.co.snohomish.wa.us/

Message
Yes Build the next Airport here we need the commerce, development and service. SeaTac is already overloaded. We have here in Everett a grate sise airfield with lots of room for development. We need jobs!
Dear J. Brown:

Thank you for your comments to Snohomish County; they have been noted.
----- Original Message -----  
From: Cayla.Morgan@faa.gov [mailto:Cayla.Morgan@faa.gov]  
Sent: Friday, February 19, 2010 4:48 PM  
To: Waggoner, Dave; Dolan, Bill; Ryk Dunkelberg; Ryan Hayes  
Subject: Fw: Environmental Assessment at Paine Field  

Cayla Morgan  
Environmental Protection Specialist  
Seattle Airports District Office  
Federal Aviation Administration  
425-227-2653  

----- Forwarded by Cayla Morgan/ANM/FAA on 02/19/2010 03:48 PM -----  
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| From:  
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|Mary B <maryb4777@hotmail.com>  
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| To:  
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|Cayla Morgan/ANM/FAA@FAA  
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| Date:  
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|02/05/2010 05:49 PM  
|  
|--------->  
| Subject:  
|--------->  
|Environmental Assessment at Paine Field  
|
I strongly oppose acceptance of the current environmental assessment. It is inadequate and does not truthfully assess the impact of commercial air traffic at Paine Field.

I am an employee of the Future of Flight Foundation located at Paine Field, although the following opinions are mine and are not representative of the FoFF. However, I share this with you because I am very familiar with Paine Field, the Airport Director, the current air traffic, the proposed air traffic and what will really happen, which is quite different from what the EA studied.

For this reason, the EA is extremely flawed. There will be far more flights than what was assessed and everyone knows that this is simply a tactic being used by the airport to get an environmental assessment approved. Because if they were honest about the real number of flights that will happen, it would never be approved. So suggesting these few flights, gets them the certification change they need, and then they can increase the number of flights.

I also live within 2 miles of Paine Field in Harbour Pointe. I have owls living in the greenbelt behind my house, as well as other wildlife including raccoons, possum, an occasional cougar passing through, bald eagles flying over all the time, and coyotes, etc. We had a cougar trapped and removed at the Columbia Elementary in Harbour Pointe right near Paine Field so when you say there will be no impact on the wildlife it appears to be real dishonest and it appears as if someone who has no idea how much wildlife there is in the area did the study. In addition, there were many deer living on Paine Field in the trees and underbrush. As it continues to get cleared, those deer are displaced. Those of us who live here see them running down the road in broad daylight, frantic and lost. Dave Waggonner of the airport has bragged about how he has to shoot them and other wildlife when they get on the runway.

I also see what the runways are used for each day, day in and day out. I can tell you that Boeing will not be able to make deliveries of new airplanes here to their customers as they do now if there are commercial flights from this airport. Commercial flights will drive Boeing out of Paine Field and then there will be no economy or business to support the commercial flights and they will end of leaving anyway.

Street traffic here is already horrific at certain times due to the Ferry traffic. This is why we already know what traffic will be like when a flight is getting ready to depart Mukilteo. We deal with the Ferry and the drivers who do not live here but pass through. They are very different from drivers who live here. They are driving carelessly because they are in a hurry, they are discourteous and they litter. There is no way that those many flights a day would not have a significant impact on our already too busy and too few thoroughfares in Mukilteo. They will be on the Boeing freeway, Mukilteo Speedway and Airport Road because that is all there is to get them here. These roads are already dangerously crowded.

I strongly recommend you do an EIS to get to the bottom of the true impact on the real number of flights that the Airport has planned. I guarantee you it is not the number of flights that you studied. Also the MDBO's are some of the biggest polluters there are. You are having a hard time convincing Mukilteans that your study was accurate when so many of us are
in the aerospace business and know better.

Mary Brueggeman
5119 98th St SW
Mukilteo, WA
98275
425-879-8702

Hotmail: Trusted email with Microsoft's powerful SPAM protection. Sign up now.
Dear Mary Brueggeman:

Thank you for your comments to the FAA; they have been noted. Please refer to the following general responses (see Appendix S) that apply to your comments.

**General Response 1-1:** Why can't the County limit or restrict operations?
**General Response 1-11:** Flawed/inadequate/biased EA
**General Response 1-13:** Additional study should be conducted
**General Response 2-2:** Boeing reaction to the Proposed Project and effect of the Project on Boeing
**General Response 3-5:** Why was 2016 selected as the future year?
**General Response 5-4:** Existing Traffic
**General Response 7-6:** What are the existing and future noise impacts?
**General Response 8-1:** Traffic analysis
**General Response 11-1:** What is the impact on wildlife?

Please also refer to the following individual response.

Wildlife Hazard Management Procedures:

In response to comments regarding the wildlife management procedures, the Airport maintains and follows a Wildlife Hazard Management Plan. The purpose of this plan is to eliminate potential wildlife/aircraft interactions that may endanger people and aircraft. This plan includes methods to prevent, reduce, haze, or eliminate wildlife hazards. The plan and permits outline the conditions of the wildlife control. Airports must balance wildlife concerns with safety concerns and human safety is the primary concern of all airport operators. The Airport utilizes the services of the Department of Agriculture staff to manage wildlife.
Dear Ms. Morgan,

I am opposed to the reclassification of Paine Field to a Class I Airport.

Opening the airport to airline service will destroy the quality of life for the residents of the communities surrounding the airport...not to mention the reduction of our tax base when our properties are devalued.

There is no need for a scheduled passenger service airport in the middle of Mukilteo. But there is a need for Boeing to remain here and for the development of aircraft industries which will strengthen the economy of our county.

The environmental assessment study which the FAA sponsored does not research the total impact of a reclassification...only the minimal recommendations of the "preferred alternative." (Who is preferring this, by the way?)

On a personal note, I was at the Harbour Pointe Everett Clinic in Mukilteo (which is located at the end of the southbound runway) the other day when a large jet flew overhead. I couldn't hear what the pharmacist was saying. I can only imagine the disruption of life for schools, medical facilities and businesses under this pathway if airlines are allowed to move in.

Please provide another EA from an impartial firm which will include an assessment of the total community impact from reclassification to unlimited airline use, and also include community involvement from the affected communities.

Thank you.
Arlene Brumm
Mukilteo resident
Response to Comment

Dear Arlene Brumm:

Thank you for your comments to the FAA, Snohomish County, and Paine Field Airport; they have been noted. Please refer to the following general responses (see Appendix S) that apply to your comments.

General Response 1-9: Roles of consultant and their qualifications
General Response 1-13: Additional study should be conducted
General Response 1-13: Additional study should be conducted
General Response 1-16: How will the proposal be funded?
General Response 2-2: Boeing reaction to the Proposed Project and effect of the Project on Boeing
General Response 3-5: Why was 2016 selected as the future year?
General Response 3-13: What is a Class I Airport? Explanation of Federal Aviation Regulations (FAR) Part 139
General Response 3-14: What actions will require additional environmental review?
General Response 4-6: What does the term "Preferred Alternative" mean?
General Response 5-1: Existing aircraft noise concerns
General Response 6-4: What are the quality of life impacts?
General Response 7-6: What are the existing and future noise impacts?
General Response 7-7: Noise impacts on schools
General Response 9-1: What is the impact upon property values?
1-23-10

Dear Mr. Waggoner:

Due to prior commitments we were unable to attend any of the meetings open to the public concerning commercial flights to and from Paine Field. Because my husband and I live three-quarters of a mile from the field, we hear every plane that takes off. Not a problem for us. We would like to voice our support in favor of commercial service at Paine Field. Even if the noise is excessive, it can create a small but comfortable Paine Field can be as well.

Yours sincerely,

Bernice Beverly Brunner

Beverly E Brunner
1427 100th St, SW Unit 145
Everett WA 98204-1106

RECEIVED
JAN 26 2010
BY SNOHOMISH COUNTY AIRPORT

Mr. Dave Waggoner, Director
Snohomish County Airport
3220 100th St, Everett, WA 98204
Response to Comment

Dear Bernie & Beverly Brunner:
Thank you for your comments to Paine Field Airport; they have been noted.
Dear Ms. Morgan, Monday, Jan 7th, 2010

Having just digested the Edmonds Beacon's reporting of the first two Public Hearings, plus the Edmonds City Council feedback, not to mention, our city of Mukilteo's position on the addition of more commercial Aviation at Paine Field, We wish to add our most Vigorous Protest. We have been Mukilteo resident/homeowners for nearly the last 8 years here, and our Harbour Point Community, [tatoosh], is not so far off the current flight paths' into and away from Paine Field that just the existing Air Traffic[ Boeing Jets, UPS, Tramco, and an ever growing amount of private smaller aircraft ] can really be "noisy". When most of our Neighbors and us purchased our fine homes here in Harbour Point, it was with the Clear understanding that "No Further Commercial Aviation " would be allowed at Paine field. Our Homes Investment valuations were [ and are ],to have been based on that Contract. After these last several years we have begun to see challenges to the past Status Quo, that even in our countrys troubled Real Estate - mortgage industry problems, are resulting in our Harbour point real estate pricing dropping 25 % or more and we can only forsee further devaluation to all our homes in proximity to Paine Field, if you go ahead with Commercial Aviation Flights - currently being discussed. We urge the FAA to re-think letting Horizon Air, or Allegiant to land at Paine Field, or Alaska or ?? as it Will lead to the degradation of a terrific northwest Community, its Homes, Schools, Quality of life, Businesses [ not reliant on Paine Field], and general Revenue [ tax base loss].

Please do not be swayed by those distant Snohomish County Minorities that seek percieved Airport economic gain, at any cost and do not Care about those thousands of taxpayers here at Paine Field/ Mukilteo, Wa.
Sincerely,
Don and Jean Brunson
10846-53 rd pl. west
Mukilteo, Wa. 98275
Dear Don & Jean Brunson:

Thank you for your comments to the FAA and Paine Field Airport; they have been noted. Please refer to the following general responses (see Appendix S) that apply to your comments.

General Response 2-1: MRD document
General Response 5-1: Existing aircraft noise concerns
General Response 6-1: Significance of Project Effects
General Response 6-4: What are the quality of life impacts?
General Response 7-7: Noise impacts on schools
General Response 9-1: What is the impact upon property values?
Cayla,

We want you to know that we attended the last EA hearing and have studied the EA report. We want you to know that we are against the development of Paine Field. As Realtor's and residents of Mukilteo for the past 20 years we know that this proposed development will severely threaten our quality of life here in Mukilteo. The report does not take into consideration the total volume of flights or the total capacity of the airport. This is a serious flaw and to not even address this is very bad planning. We ask that you consider this fact and authorize your support for a new EA that will address the airport at full capacity. In addition a member of the community was at this meeting and displayed a picture of a spotted owl from his deck. The current EA states that there is no significant impact on wildlife or endangered species. We ask you to consider this very important fact. We were also surprised to note the findings in the EA that their would be no significant impact on the schools or parks in the area. We want you to know that there is a newly expanded Mukilteo little league park on the Southeast side of Paine Field. This park will no longer be usable when the airport reaches full capacity as well. The Fairmont Elementary school is located on the East side of Paine Field and will be severely impacted from the noise as well. We have a mechanic who's business is located directly under the flight path at the South end of the runway. We've been in his parking lot when a plane is taking off and we always have to stop our conversation because we cannot hear one another. This will seriously affect the businesses and homes under the flight path. There is so much to consider and this EA report falls very short in it's scope to address the real impacts of the airport in a larger capacity. We urge you to consider these facts before a decision is made that will be a disaster in the long run for the environment, schools, quality of life, and not to mention the reduced property values. The MRD was in place when the Harbour Point area was developed and was built up as a destination neighborhood for Mukilteo and the community has benefited from this development. Mukilteo has been voted by Money magazine as one of the top ten neighborhoods in the country and this will no longer be the case if Paine Field expands. Mukilteo and it's citizens will not benefit from Paine Field expansion and it will only be a matter of time before this community will be destroyed. Please consider these facts as well as many others that have been overlooked in the current EA. We urge you to do whatever you can, at the very least to influence the order of a new EA that will take into account the full impact using the correct model of full capacity at Paine Field.

Most Respectfully,
Greg & Janet

Greg & Janet Buehler
Windermere Real Estate/M2, LLC
Associate Brokers
CRS, ABR
Janet: 425-870-3749
Greg: 425-870-3748
Response to Comment

Dear Greg & Janet Buehler, on behalf of Windemere Real Estate:

Thank you for your comments to the FAA and Paine Field Airport; they have been noted. Please refer to the following general responses (see Appendix S) that apply to your comments.

General Response 2-1: MRD document
General Response 3-5: Why was 2016 selected as the future year?
General Response 3-10: What is the capacity of the airport?
General Response 5-1: Existing aircraft noise concerns
General Response 6-1: Significance of Project Effects
General Response 6-4: What are the quality of life impacts?
General Response 7-7: Noise impacts on schools
General Response 7-13: What is the effect of the proposed project on parks?
General Response 9-1: What is the impact upon property values?
General Response 11-1: What is the impact on wildlife?
-----Original Message-----
From: Cayla.Morgan@faa.gov [mailto:Cayla.Morgan@faa.gov]
Sent: Friday, February 19, 2010 3:51 PM
To: Waggoner, Dave; Dolan, Bill; Ryk Dunkelberg; Ryan Hayes
Subject: Fw: Paine Field commercial flights

Cayla Morgan
Environmental Protection Specialist
Seattle Airports District Office
Federal Aviation Administration
425-227-2653
----- Forwarded by Cayla Morgan/ANM/FAA on 02/19/2010 02:51 PM -----

| From: ThBunt@aol.com
| To: Cayla Morgan/ANM/FAA@FAA
| Date: 02/05/2010 03:10 PM
| Subject: Fwd: Paine Field commercial flights
From: ThBunt@aol.com
To: airserviceacommments@snoco.org
Subj: Fwd: Paine Field commercial flights

From: ThBunt@aol.com
To: airserviceacommments@snoco.org
Sent: 2/5/2010 12:20:06 P.M. Pacific Standard Time
Subj: Paine Field commercial flights

I am totally against a few people making it uncomfortable for a large group of people for the sake of a few flights. That is probably the issue, they have been lied to about how many flights will actually be going and coming from this airfield. They were promised that this would not happen in the future. Many people paid a heavy price for their homes which will probably go down in value now. This is just an example of how this dominated Democratic area really feels towards the general public. They know best for the rest of us. People will remember this and vote for the right people next go round. I personally am very resentful for this intrusion into my life.

Ann Bunton
9625 236th Street S.W.
Edmonds, WA 98020
Phone: 206-542-3451
Dear Ann Bunton:

Thank you for your comments to the FAA and Paine Field Airport; they have been noted. Please refer to the following general responses (see Appendix S) that apply to your comments.

**General Response 1-6:** What are the FAA and County roles in this EA and has a decision been made to move forward?

**General Response 1-10:** Scope of the EA analysis for future operations and passengers

**General Response 2-1:** MRD document

**General Response 3-5:** Why was 2016 selected as the future year?

**General Response 9-1:** What is the impact upon property values?
-----Original Message-----
From: Cayla.Morgan@faa.gov [mailto:Cayla.Morgan@faa.gov]
Sent: Wednesday, January 20, 2010 5:13 PM
To: Waggoner, Dave; Dolan, Bill; Ryk Dunkelberg; Ryan Hayes
Cc: Patricia.Deem@faa.gov; Caroline.CTR.Poyurs@faa.gov; Roland.J.McKee@faa.gov
Subject: Fw: Clarification on Air Service to Paine Field

Cayla Morgan
Environmental Protection Specialist
Seattle Airports District Office
Federal Aviation Administration
425-227-2653

----- Forwarded by Cayla Morgan/ANM/FAA on 01/20/2010 04:13 PM -----

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Cayla -

Could you please clarify the statements being made that the EIS does not cover (comprehensively) the increase services to Paine Field at the maximum levels allowed. I do not understand whether any and all airlines, once Paine Field is approved for commercial flights, could be "guaranteed" access to the field without any further EIS studies? This would seem counterproductive to the reasoning behind Impact Studies in the first place.

The current EIS seems to take into account those potential flights from the two airlines (Allegiant and Horizon) but perhaps do not take into account any others that could open daily operations at Paine Field once approved. I find this hard to believe that the EIS would only cover the current predications of service from these two airlines but with "approval" of service, any airline could gain access to Paine Field for any level of service with no further EIS or limits other than those imposed by the size of the field. Perhaps this is not cost effective at this time for other airlines, but if it is possible, it seems like a large enough loop hole in the system to potentially create major problems. If other EIS studies are required beyond the level of services the current study predicts, can you tell me what the thresholds are and if there truly is an FAA guarantee that Paine Field would be open to other airlines at greater capacities without further studies as the opposition is stating.

I do appreciate any clarification.

Thanks

Chris Burdett
Mukilteo, Washington
206.715.9910
Response to Comment

Dear Chris Burdett:

Thank you for your comments to the FAA; they have been noted. Please refer to the following general responses (see Appendix S) that apply to your comments.

**General Response 1-10:** Scope of the EA analysis for future operations and passengers
**General Response 3-5:** Why was 2016 selected as the future year?
**General Response 3-14:** What actions will require additional environmental review?
-----Original Message-----
From: Cayla.Morgan@faa.gov [mailto:Cayla.Morgan@faa.gov]
Sent: Monday, January 25, 2010 6:02 PM
To: Waggoner, Dave; Dolan, Bill; Ryk Dunkelberg; Ryan Hayes
Cc: Patricia.Deem@faa.gov; Caroline.CTR.Poyrs@faa.gov; Roland.J.McKee@faagov
Subject: Fw: Proposed flights from Paine Field

Cayla Morgan
Environmental Protection Specialist
Seattle Airports District Office
Federal Aviation Administration
425-227-2653
----- Forwarded by Cayla Morgan/ANM/FAA on 01/25/2010 05:02 PM -----
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<td>Cheryl Burkey <a href="mailto:caburkey@yahoo.com">caburkey@yahoo.com</a></td>
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Please accept this e-mail as an expression of my concerns regarding the proposed flights out of Paine Field.

For starters, I think everyone can agree that this is simply a small step for much bigger things. The two (2) airlines figure if they get authority for flight travel in and out with small jet planes then more people will be acceptable to the idea and before you know it, we have dreamliners flying in and out of the airport all day and all night.

I was born and raised in the State of Washington and grew up learning to appreciate the great wilderness and wildlife which I try very hard to help preserve. The Environmental study showed that the airline travel would not affect the wildlife and this is where I have grave concerns.

Airport Road has several ponds for ducks and there are fairly large "greenbelt" areas for other wildlife. Last summer, I thoroughly enjoyed sitting out on my upper deck watching the squirrels and various different types of birds flying around. One day I heard a racket outside and checked to see what was going on and behold--there was an bald eagle in a tree. On several occasions I observed that bald eagle flying around right over Airport Road. The bird obviously had a nest amongst the trees.

Not only are bald eagles in danger of becoming but they are a symbol of what this country is "SUPPOSED" to stand for. Freedom! Where will this eagle go next year?

I won't even get into what this will do to the value of my home. It appears as though the government simply does not care about its citizens any more and of what might happen to them. It's all about the money!

Cheryl Burkey
Dear Cheryl Burkey:

Thank you for your comments to the FAA; they have been noted. Please refer to the following general responses (see Appendix S) that apply to your comments.

**General Response 3-5:** Why was 2016 selected as the future year?
**General Response 3-14:** What actions will require additional environmental review?
**General Response 9-1:** What is the impact upon property values?
**General Response 11-1:** What is the impact on wildlife?
Dear Mr. Reardon & the members of the Snohomish County Council:
I live, work and my child goes to high school near Mukilteo in the North Edmonds area. I am very concerned about the proposal to allow commercial aircrafts to take off and land at Paine field. The prospect of opening this service to commercial aviation needs to be studied and allowed with VERY stringent limits. It is my understanding that once the “door is opened” to this type of service then we will not have any available mechanism in place to limit the number of flights taking off and landing with each airline at Paine field.
As a homeowner and registered voter, I want you to know that I am completely against Paine field becoming available for daily commercial airline flights. I believe that this will greatly impact our quality of life in a very negative manner, greatly reduce our property values, be a detriment to our environment and could end up being a catastrophic safety issue for local homes and schools. Please fight this expansion as our elected leaders.
Thank you.

Mary Bussiere-Watts
email: mary@accountingsystemsservices.com
Dear Mary Bussiere-Watts:

Thank you for your comments to the FAA, Snohomish County, and Paine Field Airport; they have been noted. Please refer to the following general responses (see Appendix S) that apply to your comments.

- **General Response 1-8**: Adequacy of FAA guidance and use of FAA guidance
- **General Response 1-10**: Scope of the EA analysis for future operations and passengers
- **General Response 1-13**: Additional study should be conducted
- **General Response 3-5**: Why was 2016 selected as the future year?
- **General Response 3-14**: What actions will require additional environmental review?
- **General Response 6-4**: What are the quality of life impacts?
- **General Response 9-1**: What is the impact upon property values?
- **General Response 9-6**: What is the impact of the project on crime?
- **General Response 11-5**: What are the health impacts compared to safety?
Dear Ms. Cayla Morgan,

I am writing today as a concerned citizen and taxpayer of Snohomish County. The strong movement underway by Everett developers and some of our elected representatives at the County level, determined to bring commercial service to Paine Field deeply concerns me.

• The Mayors and City Councils of Brier, Edmonds, Lynnwood, Mountlake Terrace, Mukilteo, and Woodway already oppose expansion at Paine Field.

• They support the MRD document that has been reviewed six times since 1978 and agree to seek a permanent solution that is legally binding, and support the document known as an Inter Local Agreement. This document would protect the quality of life of the communities while supporting a general aviation status and preserving the exclusive use for the Boeing Company.

• The consequences of scheduled service at Paine Field would insure a degradation of property values, thereby lowering the tax revenues for our cities and changing the quality of life for our citizens.

• Please consider documented negative health and learning issues that will affect tens of thousands of school children and help engage our school district in this public discussion.

• While the proponents of scheduled flights state that a few flights a day will not be disruptive, the reality is that once commercial service is allowed, NO ONE will be able to restrict the type of aircraft, commercial or cargo, the time of day, or the number of flights. Airport noise will be heard county wide, not just in the neighborhoods surrounding the airport.

• Commercial service will have ramifications throughout the County. If revenue decreases from the six surrounding cities due to property value degradation, taxes will increase throughout the County.

• The county Executive and council members must hear from you - often. As representatives of your city, you have the ability and the influence to remind them;
as elected officials they need to balance business interests while retaining the quality of life in our communities. County officials must not be allowed to sacrifice one for the other.

- I urge you to continue pressuring our County Council to negotiate in good faith and in the light of day. Currently, they have been listening to insinuations made by a low level FAA representative, Airport Director Waggoner, and developers and business interests. Protect our quality of life in Lynnwood, WA.

I look forward to your reply.

Sincerely,

Brian Butts
Response to Comment

Dear Brian Butts:

Thank you for your comments to the FAA; they have been noted. Please refer to the following general responses (see Appendix S) that apply to your comments.

General Response 1-1:  Why can't the County limit or restrict operations?
General Response 1-10: Scope of the EA analysis for future operations and passengers
General Response 1-13: Additional study should be conducted
General Response 1-15: EA did not reflect the opposition of the community
General Response 2-1:  MRD document
General Response 3-1:  What is the purpose and need for the action or project?
General Response 3-14: What actions will require additional environmental review?
General Response 6-4:  What are the quality of life impacts?
General Response 7-7:  Noise impacts on schools
General Response 9-1:  What is the impact upon property values?
General Response 9-2:  Indirect/induced traffic effects
General Response 9-8:  What are the health and quality of life effects associated with the project?
PAINE FIELD ENVIRONMENTAL ASSESSMENT
GENERAL RESPONSES

ISSUE 1, STUDY PROCESS

1-1 Why can’t the County limit or restrict operations?

Comments stated that the County should limit or restrict commercial operations. Other comments expressed concern that once commercial operations are allowed that there will be no limit to those operations. The County is not allowed to limit or restrict operations at the Airport, because it is a public use airport that has accepted federal funding, which requires certain assurances. In accepting federal funding, the County has agreed to comply with 39 specific grant assurances. These assurances require that the County, among other things, must “make the airport available as an airport for public use on reasonable terms and without unjust discrimination to all types, kinds, and classes of aeronautical activities, including commercial aeronautical activities offering services to the public at the Airport.” (Grant Assurance 22(a)).

The U.S. government deregulated the airline industry with Public Law 95-504, known as the “Airline Deregulation Act of 1978.” Since the deregulation of the airline industry in 1978, certificated U.S. air carriers are free to fly routes of their choice and serve airports of their choice. Airports that are composed of surplus federal property and/or receive federal funding are considered public use airports, and must be made available for use on a reasonable basis when a carrier seeks to start service. A consequence of that Act allowed airlines unrestricted choice as to which airports they serve. Other than to ensure safety, neither the Airport Sponsor (Snohomish County) nor the Federal government controls where, when, and how airlines provide service. Operators of public use airports, such as Paine Field, cannot deny access to an airline if the aircraft they propose to use can safely operate at that facility. Consistent with its grant assurance obligations, Snohomish County has been negotiating in good faith with Horizon Air and Allegiant Air to accommodate proposed passenger service at Paine Field.

If the FAA were to find the Airport in non-compliance with its grant assurances, the consequences could include the suspension of grant funding, loss of the Part 139 Certificate, and the County could be required to pay back historical grant funding. The requirements of Grant Assurance 22a are similar to the requirements of the quitclaim deed for airport property from the Federal government to Snohomish County. Deed covenants require that the land be used for public airport purposes for the use and benefit of the public, without unjust discrimination or granting of exclusive rights. If Snohomish County does not meet these deed requirements, if portions of the Airport are transferred for non-airport purposes, or if the entire property ceases to be used as an airport, the property may revert back to the Federal government at their option.¹ See General Response 1-4 on grant funding and grant assurances, and General Response 3-15 on what actions would require additional environmental review.

¹ Quitclaim Deed, Book 889859, Volume 421, Pages 449-467.
1-2 What is the Centennial rule? Does it apply here?

Some comments recommended invoking the Centennial Rule at Paine Field to enable the County to reject the commercial service request at Paine Field. The Centennial Rule, Title 49 U.S. Code (USC) 47107 (q) and (r), provides an exception test under which a general aviation airport can prohibit scheduled air passenger service yet otherwise remain “in compliance” and qualify for federal funding under FAA rules. Specifically, the rule states:

“Notwithstanding any written assurances prescribed in subsections (a) through (p), a general aviation airport with more than 300,000 annual operations may be exempt from having to accept scheduled passenger air carrier service, provided that the following conditions are met: (1) No scheduled passenger air carrier has provided service at the airport within 5 years prior to January 1, 2002.

(2) The airport is located within or underneath the Class B airspace of an airport that maintains an airport operating certificate pursuant to section 44706 of title 49. (3) The certificated airport operating under section 44706 of title 49 does not contribute to significant passenger delays as defined by DOT/FAA in the ‘Airport Capacity Benchmark Report 2001’. (r) An airport that meets the conditions of subsections (q)(1) through (3) is not subject to section 47524 of title 49 with respect to a prohibition on all scheduled passenger service.”

Paine Field does not meet the primary requirement of the Centennial Rule to be a general aviation airport with more than 300,000 annual operations. Paine Field accommodated approximately 143,722 annual operations in 2008, 114,784 in 2010 and the Final EA only forecasts 122,127 annual operations by 2018. Therefore, the Centennial Rule does not apply to Paine Field.

1-3 An independent investigation is needed because the FAA pushed the County to approve the terminal

Comments suggested that the FAA pushed Snohomish County to support construction of a terminal, thus an independent investigation should be completed. Both the FAA and Snohomish County have followed all applicable rules and regulations in responding to the requests from the airlines to initiate commercial passenger service at Paine Field. The FAA has taken the appropriate actions related to the approval process for all Federal actions. The referenced communications reflect the parties seeking clarity concerning the requirements of the grant assurances, as well as the Federal agency steps and requirements in approving the Federal actions. Snohomish County has been and continues to negotiate in good faith with the air carriers in accordance with those requirements.

The FAA is not requiring, nor do they have the power to require, Snohomish County to change existing land use, existing zoning, or future planned land use to allow Paine Field to be served by the air carriers.
1-4 The County should no longer seek FAA funds

Some comments were received stating that no additional taxpayer money or FAA grants should be given to Snohomish County for Paine Field and that the County should pay back funds already received from the FAA.

Even if Snohomish County were to no longer take any FAA grants for Paine Field, the County would still be obligated due to the tens of millions of dollars already received in FAA grant funding. The County would also have to pay FAA back for any funds received in the past. The County does not believe that it is feasible or prudent to pay the FAA back because the County would then be responsible for the on-going operation of the Airport. The County would likely have to significantly increase fees charged to tenants or would have to obtain other County funding (derived from taxpayers), which is not considered prudent in today’s economic climate. See also General Response 1-1.

1-5 Mitigation

Comments received concerning mitigation were varied. Some comments mentioned the need for mitigation for anticipated environmental impacts associated with the Airport and the proposed actions/projects. Other comments questioned what roadway traffic, noise, and air quality mitigation would be required as a result of the proposed actions and who would be responsible for that mitigation.

Mitigation is only required for actions where the project-related effects would exceed the Federally defined thresholds of significance (see also General Response 6-1). As is noted, the proposed actions and their associated projects are not expected to produce impacts that would exceed the Federal thresholds and thus, compensatory mitigation is not required for the proposed actions at Paine Field.

Even though actions may not exceed defined thresholds, the County and airport users undertake best management practices (BMPs) to regularly reduce the effects of the Airport on the surrounding community, such as noise abatement measures and emission reduction actions. These actions are funded by the County or the tenants. These are referred to as BMPs as they are not mandated because of an exceedance of a federal threshold.

For traffic mitigation, the only required mitigation identified in the EA is traffic mitigation fees, which are a local requirement. Implementation of the proposed actions and associated projects will require contributing local mitigation fees to the two WSDOT intersections to aid in funding improvements to the I-5/128th Street SW interchange, per the interlocal agreement and WSDOT comments. Traffic mitigation fee payments to the WSDOT and the City of Mukilteo would mitigate the project’s impacts to the intersection of SR-525 at 84th Avenue NE by allowing the signal timing of the intersection to be optimized, which is anticipated to allow the intersection to operate at an acceptable level of service.

Under the Washington State Growth Management Act, state and local communities can impose impact fees based on new surface traffic that a project is expected to generate. Appendix F,
Traffic Impact Analysis notes that impact fees would be required based on the passengers that would be served at the Airport and their use of area roadways and local intersections. The traffic impact fees that would be paid by the Airport to Snohomish County, WSDOT, and the City of Mukilteo for the proposed actions have been calculated at approximately $333,262.85.

In regards to noise mitigation, the federal threshold for significance is 65 DNL. As stated on Page D.21 of the EA, there are no noise sensitive land uses within the 65 DNL noise contour or greater. Therefore, no noise mitigation is required. See General Response 7-1.

In response to comments about air quality mitigation, Snohomish County is in attainment for all pollutants as defined by the U.S. Environmental Protection Agency (EPA). This means, that while past pollutant levels in parts of the county may have exceeded standards, currently the standards are being attained. The area retains a maintenance designation for carbon monoxide due to exceedances during winter months of the standard during mid-1980s and conditions in 1992.

As the proposed actions would generate emissions less than de-minimis, mitigation would not be required. However, Snohomish County notes that it continues to work with its existing and future tenants to reduce emissions and implement best management practices. The County will investigate participation in the FAA’s Voluntary Airport Low Emission (VALE) grant program to reduce pollutant emissions from its fleet vehicles and those of its tenants. These programs (such as participation in the VALE program) are voluntary and not related to the proposed actions; no mitigation is required from the proposed actions. See General Response 10-2.

1-6 What are the FAA and County roles in this EA and has a decision been made to move forward?

Some comments requested clarification of the role of the FAA and the County in the EA process and the environmental decision making process. Also, some comments suggested that the decision to move forward with the proposed federal actions has already been made.

The FAA is the agency responsible for meeting the requirements of NEPA for federal actions related to the airport. Because the federal actions were not eligible for a categorical exclusion, the FAA required the preparation of an EA to determine if the actions would produce significant adverse effects. Both the FAA and County have been involved in this EA process from the beginning of scope development.

In the case of actions subject to EAs, FAA guidance enables the FAA to delegate responsibility for preparing the Draft EA to the Airport Sponsor. As such, Snohomish County’s role in this EA process is to prepare the environmental documentation (either the County itself or, in this case, through the use of consultants - See General Response 1-10) for the proposed Federal actions at Paine Field and submit the Draft EA to the FAA. FAA typically provides funding assistance through the Airport Improvement Program (AIP) to Airport Sponsors to complete NEPA documentation. Ultimately, the FAA must accept and sign the EA for it to become a Federal document used in the decision making process.
As of the preparation of the Draft EA and response to comments, the decision to approve the federal actions has not yet been made and cannot be made prior to an official environmental finding based on the Final EA. Following receipt of the Final EA from the Airport Sponsor, the responsible FAA official (See General Response 1-7) reviews the EA, the public comments, the expected impacts, the proposed mitigation, and then makes a decision. The FAA will either decide that the anticipated environmental impacts are not significant, or have been adequately mitigated where appropriate, and issue a Finding of No Significant Impact (FONSI)/Record of Decision (ROD). Alternatively, the FAA will decide that the anticipated environmental impacts are significant and recommend the preparation of an EIS.

1-7 Who will make the final environmental determination?

Some comments asked who would make the environmental determination on the proposed actions. The approving official is the FAA Regional Administrator, Northwest Mountain Region.

1-8 Adequacy of FAA guidance and use of FAA guidance

Some comments questioned FAA’s implementation of and compliance with the National Environmental Policy Act (NEPA) as well as analysis methodologies used in the EA. Some comments stated that the EA was biased toward the FAA, and that there was insufficient detail in the EA.

The FAA has the authority and responsibility, consistent with NEPA and CEQ, to prepare and issue guidance for the preparation of environmental documents addressing FAA actions. The FAA has published such guidance and Airport Sponsors are required to follow that guidance when preparing EA’s.

Preparation of the Draft EA followed the policies, procedures, and guidelines as outlined in FAA Order 1050.1E Change 1, Environmental Impacts: Policies and Procedures and Order 5050.4B, National Environmental Policy Act (NEPA) Implementing Instructions for Airport Actions. These orders outline FAA accepted methodologies, methods, models, techniques, and thresholds of significance for the impact assessment and preparation of EA documents. The EA was prepared in compliance with NEPA, and Council on Environmental Quality (CEQ) regulations. All environmental documents prepared under FAA oversight follow and adhere to these same Orders, setting national standards for the preparation of environmental documentation.

1-9 Roles of consultant and their qualifications

Some comments questioned the role of the consultant in the Environmental Assessment (EA) process and the qualifications/potential for bias of the consultant to complete NEPA analysis. The Federal Aviation Administration (FAA) often delegates the preparation of Environmental Assessments (EAs) to the Airport Sponsor for projects involving federal actions. Snohomish County, as the Airport Sponsor, retained a third-party, independent consultant to prepare the Draft EA. The third-party consultant was retained using the County procurement process. The
Compliance with NEPA is not voluntary and it is the FAA’s obligation to ensure that the analysis is done correctly before accepting the EA as a Federal document. Barnard Dunkelberg & Company has no financial interest in whether or not a project is constructed or initiated. Therefore, there is not potential for a conflict of interest. For information on the FAA and County roles, see also General Response 1-6.

1-10 Scope of the EA analysis for future operations and passengers

Some comments received on the Draft EA stated that the scope of the EA should be broader in terms of the level of operations analyzed and more long-term in nature, believing that once commercial service was initiated at the Airport, that the airlines would choose to operate many more flights and enplane many more passengers than what was projected in the Draft EA. A majority of the comments questioned the projected numbers of operations and passengers used in the analysis, indicating that they were too low.

Preparation of the Draft EA complied with applicable FAA Orders and guidance implementing NEPA (see General Response 1-8). The orders outline FAA accepted methodologies, methods, models, techniques, and thresholds of significance for the impact assessment and preparation of EA documents based on actions that are “reasonably foreseeable”. The FAA does not believe that it is reasonably foreseeable that activity levels will be higher than those projected by the airlines (Appendix A). Council on Environmental Quality (CEQ) regulations implementing NEPA require that documents address impacts that are “reasonably foreseeable.” FAA Order 5050.4B Paragraph 9q defines reasonably foreseeable as:

> “An action on or off-airport that a proponent would likely complete and that has been developed with enough specificity to provide meaningful information to a decision maker and the interested public. Use the following table to help determine if an action is reasonably foreseeable.”

(footnote 4: Paragraph 905.c(1) and (2) provide definitions of “connected actions” and “similar actions,” respectively)

The evaluation of operations or enplanements beyond 2018 would be speculative and not reasonably foreseeable. Not only would aircraft operation numbers be speculative, but the types of aircraft flown, the destinations flown, and the time of day or night those operations could occur would also be speculative. An infinite number of possibilities could be imagined, none of which would be based on actions which are reasonably foreseeable. This is especially true in response to the comment requesting that the maximum capacity of the Airport be evaluated. The maximum capacity of the Airport is a theoretical number driven by the type of aircraft, and will vary based on the aircraft fleet mix. In addition, any additional airlines or aircraft types desiring to operate at the Airport would be subject to additional environmental documentation. If the number of passengers exceeded the capacity of the proposed terminal; the terminal would require expansion or a new terminal. Such expansion of the terminal would in turn require modification to the Airport Layout Plan (ALP), which would be another Federal action, triggering NEPA compliance. For more information on what actions would require additional environmental review, please see General Response 3-15.
However, in response to these public comments, the FAA tasked the County to prepare an analysis to disclose the effects should activity grow and reach the **maximum capacity of the proposed terminal**. The FAA determined that the terminal is the limiting factor, so the maximum capacity of the modular terminal was examined as a theoretical scenario. This additional analysis was prepared for disclosure purposes to respond to comments about activity levels either above that identified by the airlines or outside the time period which the FAA believes is reasonably foreseeable. See also *General Response 3-12*. This analysis evaluated the Hirsh Report, Terminal Capacity Estimates (Draft and Final EA Appendix K) which reflect a theoretical activity level of the maximum capacity of the proposed terminal in terms of the maximum number of enplanements that could be accommodated and the resultant number of aircraft operations utilizing the proposed aircraft types. This analysis and its results can be found in **Appendix P** of the Final EA. For more information on methods, scope and impact analysis, please see **General Responses 1-8 and 1-12**.

1-11  **Flawed/inadequate/biased EA**

Some comments indicated that the EA was flawed and inadequate in its analysis of environmental impacts of the Airport or the proposed actions and its associated projects.

The FAA and County believe that the EA provides an appropriate assessment of the potential environmental impacts of the proposed actions both for existing conditions and under reasonably foreseeable conditions in accordance with all FAA Orders and guidance (**General Response 1-8**) and the requirements of NEPA. During the preparation of the EA, the most up-to-date models were used in all modeling exercises, per FAA Orders. FAA policy is that the same model will be used throughout the preparation of an EA even if a new model is available. However, based on public comments, the air quality analysis in the Final EA was updated with the most recent version of the model. The EA addresses the potential impacts of the proposed actions based on reasonably foreseeable conditions compared to the thresholds of significance outlined in the FAA Orders and described in **General Response 6-2**. The development of the EA and its conclusions take a critical look at the potential impacts that could occur if the proposed actions are implemented, as required under the NEPA. For more information on the scope and analysis within the EA, please see **General Responses 1-8, and 6-1**.

1-12  **Adequacy of public involvement and release of the Draft EA and Public Hearings**

Some comments questioned the adequacy of public involvement in the EA process including both the public review of the draft EA document and the public hearing arrangements. Some comments related to the timing for the release of the Draft EA, with some suggesting that the release near the holidays and perceived lack of notification was deliberate in an effort to reduce the level of public involvement. Also, comments were received noting the lack of space in the third public hearing in Mukilteo, stating that it was poorly planned and limited the ability to hear commenters.

FAA Order 1050.1E Change 1, paragraph 208.a states that:

> NEPA and the CEQ regulations, in describing the public involvement process, require Federal agencies to: consider environmental information in their decision making process; obtain
information from the public regarding environmental concerns surrounding an agency’s proposed action; fully assess and disclose potential environmental impacts resulting from the proposed action and alternatives; and provide the public with this information and allow it to comment on these findings.

The Draft EA was published with electronic versions of the entire EA placed on the County’s website and hard copies available for review and comment at the following locations:

- Snohomish County Planning and Development Services Customer Support Center,
- Snohomish County Airport administrative office, and
- Seven local libraries.

Public involvement for this EA provided more public hearings than is typical for a FAA EA. Snohomish County ultimately conducted three public hearings. Each hearing included an open house to enable the public to discuss the actions/project with the County, the FAA and consultant staff, followed by a presentation, and a formal comment forum. Notices for the three public hearings were run in the Everett Daily Herald, the Mukilteo Beacon, and Mukilteo Tribune. In addition, notices of the hearings were posted at the local libraries where the EA was available, as well as on the County website.

The Draft EA was released as soon as it was complete and was not timed to occur during the holidays. Originally two hearings were scheduled for January 4th and 5th. Some early comments requested that additional public hearings be added not so close to the holidays, allowing people an opportunity to review the document and be available. Both the FAA and the County were responsive to these comments, and adjustments in scheduling and access were made. A third hearing was added on January 21, 2010 to enable those people who could not attend the first hearing dates (January 4th and 5th) to attend a hearing.

In addition to requests regarding an additional hearing date, requests were made to extend the comment period. The initial end of the comment period was January 15, 2010. This comment period was initially extended to January 29, 2010. Then, when a third hearing date was added, the comment period was extended to February 5, 2010. Although the FAA generally only has one public hearing on an EA, the County felt that additional hearings were reasonable due to the public interest in the proposed actions.

All of the hearings were held starting at 6 p.m. to allow adequate time for the open houses, the hearing presentations, and verbal testimony, while balancing the fact that many people get off work around 5 p.m. The general process and procedures for the hearings allowed each person to accept one speaking card that equated to an initial allotment of three minutes for public testimony. Three minutes is the generally allowed length of comment time used at Snohomish County public meetings. If, after those three minutes were finished, a commenter wished to make additional comments, they were invited to submit additional verbal comments after all other people who wished to give testimony had received their first opportunity to speak. Or the person was invited to submit their additional comments in writing either at the hearing or by mailing or emailing their additional comments to the contact addresses. This process ensured that everyone who wished to provide verbal testimony would have a chance to speak without any one person monopolizing the entirety of the hearing. Due to the large number of commenters,
some people did not get a chance to orally finish the entirety of their comments. Recognizing that this was frustrating, the agencies hope that the commenters took the opportunity to submit the remainder of their comments in writing.

In regards to the stated inadequacies of the Mukilteo public hearing site, the FAA and the County worked with local authorities when trying to find a site in Mukilteo as was requested by a number of early commenters. The Kamiak High School in Mukilteo was found to offer the most room for a public hearing. There was no way for the agencies to determine the exact count of those in attendance prior to the night of the public hearing. Although some people were not able to attend, the same options to submit written comments were available to all interested individuals.

1-13  Additional study should be conducted

Some comments requested additional study and some comments specifically requested that the FAA prepare an EIS. Council on Environmental Quality (CEQ) regulations and FAA guidance require the preparation of an EIS for certain actions or in cases where an EA has shown significant adverse impacts.

As described in General Response 1-6, the FAA will review the Final EA, expected impacts, and proposed mitigation. If the impacts exceed the significance thresholds for any affected resource, the FAA may then recommend the preparation of an EIS. Should the impacts not exceed the significance thresholds for any affected resources; the FAA may prepare a Finding of No Significant Impact (FONSI)/Record of Decision (ROD). Please see General Responses 1-8, 1-11, and 1-12 regarding additional information on EA preparation guidance, scope of the EA, and comments on the analysis contained within the EA.

The Draft EA for the proposed actions and projects showed that there would be no significant unresolved project-related effects. Therefore, while an EIS for the proposed actions is not warranted, in response to comments requesting additional study for higher activity levels, the FAA asked the Consultants to prepare additional analysis for the maximum capacity of the proposed terminal. While the FAA does not believe this activity level scenario is reasonably foreseeable, it has been included in response to comments for disclosure purposes (See General Response 1-11).

1-14  What is the role of the State Environmental Policy Act (SEPA) and why is it not mentioned in EA?

Some comments asked why there was no discussion of the requirements of the State Environmental Policy Act (SEPA) analysis in the NEPA EA. Other comments questioned when SEPA compliance would be undertaken.
Certain actions by Airport Sponsors located in Washington must comply with SEPA. Similar to FAA Order 1050.1E, Change 1 and Order 5050.4B, the Department Ecology has issued guidance on compliance with SEPA, titled “SEPA Handbook”. Snohomish County is responsible for SEPA compliance.

The County and FAA recognize that SEPA compliance is required. While the approach to the SEPA process has not been finalized, the County may adopt the NEPA document for purposes of meeting SEPA requirements in accordance with Washington Administrative Code (WAC) 197-11-610. Thus, to preserve this option, the FAA and the County agreed to complete the NEPA process first and to then begin the SEPA process. The County will comply with SEPA and will provide public notice in compliance with the SEPA process.

1-15  **EA did not reflect the opposition of the community**

Some comments stated that the EA did not reflect the opposition of the community to the proposed actions. Other comments asked what the role of community support was in the EA.

The Draft EA did not discuss community support or opposition to the proposed actions. The public hearings and comment period provided opportunity for the community to comment upon the proposed actions and projects. Comments were received both in support of the proposed actions and in opposition to the proposed action. The FAA and Snohomish County have considered all comments received concerning the Draft EA in preparing the Final EA. These comments resulted in modifications to the main body of the EA as well as the preparation of additional analysis in Appendix P, as described in **General Response 1-11**.

A detailed response was prepared for all substantive comments, as reflected in this document. Similar comments were grouped together and responses were then prepared and are provided in this document. Individual/unique comments were responded to individually. The general grouped responses are included in **Appendix S** while the individual responses are provided either at the bottom of the letter/email or on the page following the letter/email in **Appendix Q**. Comments obtained at the hearings were responded to in **Appendix R**. The Final EA reflects changes that were made in the Draft EA based on public and agency comments. The next steps for the EA process are described in **General Response 1-6**.

1-16  **How will the proposal be funded?**

Some comments asked how the proposal would be funded and whether this would be a good use of public funds. The operations specifications for air carrier operations and the amendment to the Federal Aviation Regulations (FAR) Part 139 certificate do not require FAA or County funding. Preparation of the NEPA documentation was funded through the FAA Airport Improvement Program (AIP) of the Aviation Trust Fund\(^2\) and Airport funds. The airlines and the FAA would be responsible for their own administrative actions. The modification and expansion of the terminal building is estimated to cost approximately $3 million. Snohomish County has

\(^2\) The Trust Fund is generated through fees on aviation activities such as passenger tickets and aircraft parts.
not yet decided how the proposed modular terminal addition will be funded. Options for funding the terminal development and the specific approach to the terminal funding will be determined during negotiations with the airlines to reach agreement on a lease or license.
ISSUE 2, BACKGROUND

2-1 MRD document

Some comments cited the “mediated role determination” as an agreement or promise by the County that Paine Field would never have commercial service. In some instances, the commenters stated that they moved to the area because of the promise that commercial service would never be implemented. The May 16, 2007 Executive Summary of the Report on the Mediated Role Determination for Paine Field states the following:

In 1978 at the request of Snohomish County, the University of Washington, Office of Environmental Mediation convened a panel to recommend the future role of Paine Field. The “mediated role determination” (MRD) panel suggested that general aviation and commercial aeronautical work (such as Boeing’s Everett plant) be the dominant uses of Paine Field. The MRD Panel recommended encouraging those uses, and discouraged any uses incompatible with community harmony. The existing airport uses that would be discouraged included supplemental/charter air passenger service, large transport crew training operations, air cargo aviation, and military aviation.

In late 1978 and early 1979, the Snohomish County Planning Commission adopted the recommendations and forwarded them to the County Commissioners who adopted the recommendations with few changes. These two documents are colloquially known as the “MRD Document.”

The community and aviation business changed dramatically in the past quarter century. Populations boomed. Aeronautical technologies improved, with larger jets becoming quieter. Environmental and land use and planning laws became ever more stringent. The form of County government changed from a commission system (in which the commissioners handle both the legislative and executive functions of government) to an executive/council form of government (in which the executive leads, provides policy direction, and operates the government while an elected council decides overarching policy issues and approves the budget). The 1980s saw many disagreements around the Country between local jurisdictions and the aviation industry over noise and other impacts from a burgeoning scheduled passenger air service industry. Those disagreements led the federal government to pre-empt local attempts to control the type, frequency, and noise of scheduled passenger air service with the passage of the Airport Noise and Capacity Act (ANCA) of 1990 (49 U.S.C. 2101 et seq.). Among the requirements of ANCA was the establishment of Federal Aviation Regulations (FAR) Part 161 Notice and Approval of Airport Noise and Access Restrictions. Since the passage of FAR Part 161, only one airport has met the requirements to enable a restriction on the types of aircraft operating at that airport.
After booming through the 1990s, the economy saw a downturn with the dawn of the 21st century. The terrorist attacks on the World Trade Center in New York City exacerbated the economic problems. Boeing laid off thousands. The County Council and then County Executive Bob Drewel formed a task force to develop methods of stimulating the local economy. The task force produced an economic stimulus action plan in 2002.

The 2002 action plan called for exploration of regional air service and for specific steps to prepare for regional air service at Paine Field. This plan concerned the communities of south Snohomish County. Many south County residents believed the MRD Document forbade scheduled passenger air service and were concerned that scheduled passenger air service would disrupt and diminish the quality of life that attracted them to the area.

In 2005, County Executive Aaron Reardon formed an advisory panel of 12 community members to review and update the role of Paine Field defined by the Snohomish County Commissioners in 1978, and charged the community panel to update the MRD Document.

The community panel held its first meeting in November 2005 and heard from numerous experts on such diverse topics as land use, noise, airport operations, and airport law.

Some community panel members viewed the MRD Document as an important, fundamental social contract between the County government and the citizens and south County cities. Some of these community panel members would like to see the MRD Document rewritten to more clearly state a dislike for scheduled passenger air service.

Other community panel members believed the MRD Document has been overtaken by events and is no longer relevant. They believe the MRD Document is subsumed within Comprehensive Plans mandated by the State’s Growth Management Act and the County’s Airport Master Plan. They say the MRD Document informed the decisions made in the Comprehensive and Master Plans, and the Plans now describe the appropriate role of Paine Field.

These community panel members would like to see scheduled passenger air service at Paine Field and felt such service would drive economic development and provide a substantial convenience to users. This perspective was countered by other community panel members who vehemently disagreed, arguing no evidence supported the claim that scheduled passenger air service would stimulate economic development and claiming that scheduled passenger air service would devalue property and diminish a cherished quality of life.

The panel completed its charge in December 2006. The community panel substantially agreed on how to update the language, though some felt no need to update the MRD Document at all. For example, the community panel generally agreed that references to military aircraft operations could be deleted because Paine Field no longer hosts a military aviation unit.
The efforts of the community panel identified three primary, fundamental factors influencing the future role of the Snohomish County Airport (Paine Field):

1. Current federal law does not allow the County to prohibit or limit scheduled passenger air service.
2. Current federal law does not require the County to encourage or subsidize scheduled passenger air service.
3. The County can and should insist that an airline pay its own way and mitigate its impacts.

The MRD is advisory in nature. As stated previously in General Response 1-1, federal law does not allow the County to prohibit or limit scheduled passenger air service.

2-2 Boeing reaction to the Proposed Project and effect of the Project on Boeing

Some comments expressed concern that the proposed actions may negatively affect Boeing operations and/or cause Boeing to relocate facilities to other airports or other states. According to a Boeing Company letter sent to County officials on January 8, 2009, “Boeing would not be negatively impacted by the addition of commercial air service to Paine Field.” Boeing also expressed concern in the letter that if Snohomish County were to refuse airline service at Paine Field, the FAA could withhold future airport improvement funding. For further description of these issues please see General Responses 1-1 and 1-4.

2-3 Airport Master Plan

Some comments asked about the purpose of the Airport Master Plan and its relation to the analysis in the EA. Other comments indicated that the EA was not consistent with the Master Plan.

The Airport Master Plan is a plan for long-term physical development that may be needed at the Airport. The Airport Master Plan’s purpose is to reserve areas for potentially necessary facilities and to assess how airport land is best used in consideration of anticipated future demand. Airports typically undertake preparation of a Master Plan every 5-10 years in response to changing local and national conditions. Snohomish County completed its most recent long-range plan in 2002 for Paine Field. The 2002 Airport Master Plan included a list of projects to be implemented over 20 years and other projects to be implemented as dictated by demand. One of the projects scheduled to be implemented when demand materialized was a commercial passenger terminal project. As activity levels have changed at the Airport, the County has pursued recommendations in the Plan. Until receiving the request for service from Horizon and Allegiant, there was no need to develop the commercial passenger terminal project.

Some comments compared the forecasts included in the EA to the forecasts included in the 2002 Airport Master Plan. Some comments implied that amending the Airport’s Federal Aviation Regulations (FAR) Part 139 operating certificate enables an uncalculated and unanalyzed number of air carrier operations and that the forecasts included in the Airport Master Plan should be analyzed rather than the forecasts included in the EA. Many conditions have changed since
the forecasting effort for the 2002 Master Plan was conducted. As such, the FAA required a new forecasting effort for this EA based on new conditions and the information provided by the air carriers (Horizon Air and Allegiant Air). In addition, because the proposed action would result in air carrier service at an airport that does not presently have service, two forecasts were required – one that reflected the No Action and the other reflecting activity with the proposed actions. These forecasts were reviewed and approved by FAA as described in more detail in Appendix G of the Draft and Final EA. The preferred forecast in the 2002 Airport Master Plan was the regional low forecast (Scenario 3) which indicated approximately 10,861 passenger air carrier operations by 2016. By comparison, the forecasting effort for the Final EA indicated approximately 12,055 passenger air carrier operations by 2018 which is only slightly higher than the Master Plan forecast. See also General Response 1-11.

Some comments also recommended that the EA consider either the regional high or the national high scenarios included in the Airport Master Plan and evaluate the environmental impacts of those scenarios. Neither Snohomish County, nor the FAA has any information that would indicate that either the regional high or the national high scenarios included in the Airport Master Plan are reasonably foreseeable. For information related to the environmental impacts related to the maximum capacity of the proposed terminal, please see Appendix P of the Final EA. For more information regarding the Master Plan and the proposed terminal scenarios, please see General Response 3-5.
ISSUE 3, PROJECT AND PURPOSE AND NEED

3-1 What is the purpose and need for the action or project?

Some comments raised questions concerning the purpose and need for the proposed Federal actions and the need for the County to accommodate commercial passenger operations beyond that forecast by the two airlines proposing service at Paine Field. The purpose and need are explained on Pages A.1 through A.4 in the Final EA. The purpose of the proposed action is to allow passengers to fly between Paine Field and Portland, Spokane and Las Vegas. The need for the proposed actions is to meet an unmet demand for commercial service within the area, as identified by Horizon and Allegiant Air. The County is evaluating the development of a new passenger terminal to satisfy this demand. The FAA must review amendments to operations specifications and is required to either grant or deny the amendment to the operations specifications based on a number of criteria. The FAA will review the requests from both Horizon Air and Allegiant Air for the FAA to amend operations specifications to allow scheduled commercial air service to Snohomish County Airport/Paine Field to ensure that any amendments to the FAR Part 139 operating certificate meets all safety standards.

Activity levels beyond what is forecast are not considered reasonably foreseeable and are not pertinent to the purpose and need of the proposed project. For more information on what reasonably foreseeable actions were determined and the effects of these actions, please see General Responses 1-11 and 6-1. Also, the potential addition of new carriers providing service at Paine Field would require additional environmental review, as described in General Response 3-14.

3-2 What are the effects of the Proposed Project on general aviation?

Some comments questioned the effect of the proposed actions on general aviation operations at Paine Field. As indicated in Table B2 of the Final EA, passenger air carrier operations are expected to be approximately 13,931 by 2018 out of a total of 122,127 aircraft operations. In other words, with the proposed actions, air carrier operations are expected to account for less than 12 percent of total aircraft operations. General aviation operations are expected to total 104,479 operations in 2018 regardless of whether or not the proposed actions are implemented. Thus, the initiation of commercial service is not expected to affect the level of general aviation operations at Paine Field. Furthermore, the Annual Service Volume (ASV), or the number of aircraft operations that an airport can accommodate without undue delay, was determined to be 367,000 annual operations. As Paine Field would operate well below the ASV with or without the proposed actions, impacts to general aviation operations due to commercial service are not anticipated.
3-3 Concerns that only half of the activity was considered

Several comments stated that there was confusion over the term “enplanements”, and that the activity reported is only half of what should have been considered in the analysis.

Enplanements refer to passengers boarding flights, deplanements refer to passengers that get off the aircraft on arrival, and total passengers refers to both enplanements and deplanements. The Draft and Final EA used total passengers in the assessment. Similarly, total operations (the sum of all arrivals and all departures) were used. This confusion appears because a standard reporting of airport activity often occurs through the use of enplanements to enable comparison of one airport to another. However, for purposes of assessing the effect of the Airport and the proposed actions, enplaned and deplaned passengers (total passengers) and total operations were included. Performing environmental assessments using total passengers and operations is standard practice in FAA NEPA documents.

3-4 EA Conflicts with proposed terminal in Airport Master Plan

Some comments suggested that the proposed terminal expansion conflicts with the planned permanent terminal in the Airport Master Plan. The County’s proposed project reflects construction of a modular terminal to accommodate the proposed air service. The alternative to construct a larger, more permanent terminal was considered in the EA and is described on Page B.5 of the EA.

The 2002 Airport Master Plan facility requirements were a conservative estimate of spatial needs based on then forecast growth in activity. The Master Plan forecasts were not based on actual airline derived passenger projections, but were based on generalized “rule of thumb” airport planning estimates. The Master Plan used this approach, because at the time, there was not a specific air service proposal, and thus the needs of a possible carrier could not be precisely anticipated. This resulted in the Master Plan space requirements that overestimated the space that may be required so that adequate room was reserved on the ALP to accommodate a terminal. Recognizing that the Airport currently meets the requirements for both aircraft parking and automobile parking spaces, the County decided that the larger, more permanent terminal and parking facilities recommended in the Airport Master Plan and shown on the ALP was not warranted to accommodate the air service activity proposed by Horizon Air and Allegiant Air. A more detailed evaluation of the terminal needs was prepared based on the anticipated activity forecast by Horizon and Allegiant Airlines, which indicated a terminal building smaller than that reserved on the ALP. Given the uncertainty of the success of the service, the County proposes the development of a semi-permanent modular terminal. There are many examples throughout the industry of air service starts and stops as well as airports building terminals only to have airlines cease operations and the terminal goes unused.

Some comments also suggested that because a larger terminal is shown on the Airport’s ALP, the expansion of commercial service that might operate within this larger terminal is reasonably foreseeable and should be addressed in this EA. The purpose of an Airport Master Plan is to reserve space for potentially needed future facilities and the presence of a facility on an ALP does not indicate that demand for that facility is imminent or reasonably foreseeable. For
information regarding the forecasts used in the EA and the Airport Master Plan, please refer to General Response 2-3 and 3-13.

3-5 Why was 2016 selected as the future year?

Some comments stated that there would be growth beyond the Draft EA future year (2016) and that those future operations should be analyzed in the EA. The comments questioned why 2016 was selected as the future year and not additional dates further into the future.

Neither the NEPA nor Council on Environmental Quality (CEQ) regulations contain requirements about specific years to be evaluated. Rather, these regulations indicate that NEPA documents should address the reasonably foreseeable future (See General Response 1-11). The only reference to analysis of project impacts beyond five years in FAA environmental guidance is in Section 14 entitled Noise, of Appendix A in FAA Order 1050.1E. Paragraph 14.4g. states that “DNL (Day-Night Noise Level) contours, grid point, and/or change-of-exposure analysis will be prepared for the following: (1) Current conditions; and (2) Future conditions both with and without (no action) the proposal and each reasonable alternative. Comparisons should be done for appropriate timeframes. Timeframes usually selected are the year of anticipated project implementation and 5 to 10 years after implementation. Additional timeframes may be desirable for particular projects.”

The year 2016 was selected, in part, because it is the concurrency timeframe required under the Snohomish County Unified Development Code (SCC30.66B.155) as well as the timeframe required in accordance with the Clean Air Act General Conformity analysis years (based on the year of attainment/maintenance). The Draft EA considered noise impacts, in accordance with FAA guidance, for the first year of implementation, 2010, and for one future year, 2016, both with and without the proposed activity levels. There were a number of reasons that this timeframe was considered reasonable and appropriate. First, the information from both Allegiant Air and Horizon Air (Appendix A of the EA) was given to the County in two year increments, starting with year 1, and continuing with years 3 and 5. The forecasts of aviation activity (Appendix G) were based on these projections supplied by the airlines.

Due to the timeframe required to respond to comments on the Draft EA and changes in operational activity at the Airport during that time, the aviation activity forecasts and analysis years from the Draft EA were updated prior to the publication of the Final EA. In the Final EA, 2008 remains the base year or existing year, while 2013 was considered the initial year of commercial airline service, and 2018 was considered the future year for applicable environmental consequence analysis.

The growth rates beyond 2018 (if any) cannot be accurately predicted at this time. It is unclear whether or not the air service would be successful, or if successful, how quickly the air service would increase. Such increases would be dependent on area residents choosing to fly using commercial service at Paine Field (See General Response 3-1).
In response to concerns about future activity levels, the FAA requested that an additional appendix be prepared that identifies the operating capacity of the proposed terminal and the associated environmental effects. These issues are documented in Appendix P.

3-6 There should be an alternative future activity scenario

In response to comments received concerning alternative activity scenarios that might arise with the amended Part 139 certificate and commercial passenger terminal, an expanded analysis was prepared for the Final EA. This analysis in Appendix P, considers the theoretical maximum level of operations that could occur at the proposed terminal and the resulting environmental effect. For more information see General Responses 1-11 and 3-15.

3-7 Parking capacity

Some comments indicated that the EA failed to address parking needs of the passengers or that a future parking plan was not provided. The vehicle parking requirements associated with the proposed actions were identified using generally accepted airport planning practices and estimates of parking demands. The County determined that the existing number of vehicle parking spaces is adequate based on the anticipated passenger demand. As described on Page B.7 of the EA, Snohomish County shows a Uniform Building Code (UBC) requirement of 115 parking spaces for buildings similar in size to the proposed terminal and 141 spaces required for the terminal, the airport office, and Precision Engines (a private business located adjacent to the terminal and airport office) combined.

FAA Advisory Circular (AC) 150/5360-13 Planning and Design Guidelines for Airport Terminal Facilities indicates that between 1 space per 500 to 1 space per 700 enplanements is a general rule of thumb for estimating parking requirements for airports. Estimations using that guidance would equate to 160 to 224 spaces for the 112,000 enplanements in 2013 and 340 to 476 spaces for the 238,200 enplanements in 2018. FAA AC 150/5360-9 Planning and Design of Airport Terminal Facilities at Non-Hub Locations, Figure 6-2 indicates 340 to 440 parking spaces would be required to meet the need for the total 238,200 estimated enplanements in 2018.

There are currently six parking areas near the terminal as follows:

1. SE lot with 70 spaces dedicated to Precision and Aviation Technical Services (ATS) parking.
2. Adjacent to the existing C1/C2 terminal building with 30 spaces dedicated to airport staff and Precision parking.
3. Main lot with 177 spaces.
4. North lot with 102 spaces.
5. C4 lot with 35 spaces.

Of these six lots, only the last four can be used for air carrier passenger vehicle parking, enabling space for 364 cars, or 1 space per 308 enplanements in 2013 and 1 space per 654 enplanements
in 2018. Therefore, the available parking stalls are expected to meet the requirements for parking.

### 3-8 Increase in rental cars/rental car agencies

Comments were received about the use of rental cars or the increase in rental car agencies as a result of the proposed actions. Enterprise Rent-A-Car currently provides service at Paine Field to general aviation users of the Airport out of Building Number C84. Enterprise currently rotates cars to Paine Field from their downtown Everett lot as needed. No additional proposals or letters of interest from rental car agencies have been received to date. However, it is possible that additional rental car agencies might consider providing service at Paine Field if commercial service is initiated. If additional rental car facilities would be constructed, a review would be conducted at that time to determine if a modification to the Airport Layout Plan (ALP) would be needed, thereby triggering a federal action, which in turn would require NEPA compliance. Until a proposal for additional rental car space is received, such increases are not reasonably foreseeable.

### 3-9 Public transportation options should be considered

Comments suggested that more analysis of public transportation options, including bus service and light rail service, should be included in the alternatives chapter.

Local public transportation is technically not an alternative to regional air service. Improvements to local public transportation may, however, facilitate improved access to other airports like Bellingham or Sea-Tac. This alternative is addressed on page B.4 of the EA within the section “Use of Other Area Airports.” This alternative is also represented by the No Action Alternative because with the No Action Alternative, passengers wishing to travel by air are required to use other area airports and either use public transportation or private surface vehicle travel. With or without the proposed actions, neither the FAA nor the County can require passengers to access Paine Field or other airports using public transportation.

### 3-10 What is the capacity of the airport?

Some comments requested consideration of the maximum operational capacity of the airfield in the EA.

The capacity of the airfield system was analyzed and disclosed in the 2002 Airport Master Plan in accordance with FAA Advisory Circular 150/5060-5, *Airport Capacity and Delay*. The Annual Service Volume (ASV) is a reasonable estimate of an airport’s annual capacity (defined as the level of annual aircraft operations that would result in an average annual aircraft delay of approximately one to four minutes). According to the Master Plan, under current policies and practices, the Airport has an ASV of approximately 367,000 operations. In 2008, the Airport recorded approximately 143,722 annual operations, or approximately 39 percent of the calculated capacity. Given the dramatic decrease in general aviation activity at the Airport in 2010, the Final EA forecast (Appendix G) indicates the Airport only reaching 122,127 total operations by 2018 or approximately 33 percent of annual capacity. Consideration or analysis of
367,000 annual operations is not considered appropriate because neither the County nor the FAA has received any indication of interest to provide passenger service beyond that proposed by Allegiant Air and Horizon Air. Consequently, analysis of environmental impacts resulting from commercial operations and enplanement levels that are not reasonably foreseeable is considered speculative.

3-11 What is the capacity of the terminal?

Some comments requested consideration in the EA of the maximum operational capacity of the proposed modular terminal building expansion.

The capacity of the proposed terminal expansion was estimated and disclosed in Appendix K of the Draft EA, as described in General Response 1-11. Two estimates of terminal capacity were completed, the maximum capacity of the terminal and the realistic capacity of the terminal. The maximum capacity estimate was based on the capacity of the terminal’s gates and a range of departures per gate. Using a number of standard industry assumptions, the capacity range was determined to be between 252,000 to 401,600 annual enplaned passengers. In other words, 401,600 annual passengers boarding aircraft is considered the maximum theoretical capacity of the proposed modular terminal expansion. A more realistic capacity considers the mix of aircraft which might actually serve the Airport based on predicted fleet mix. In consideration of the mix of commercial service aircraft expected to use the facility, the realistic capacity of the modular terminal expansion was estimated at 294,000 annual enplanements.

To respond to comments concerning this issue, an analysis was added to the Final EA (in Appendix P) to examine the probable environmental effects associated with the maximum theoretical terminal capacity. See also General Response 3-15.

3-12 What is the relationship of the two terminals?

Some comments mentioned the two separate terminals shown in Figure B2 of the Draft EA and some of the comments suggested that the capacity of both terminals need to be disclosed. The base map used in Figure B2 of the Draft EA was the existing, FAA conditionally approved Airport Layout Plan (ALP) for Paine Field. Because the conditionally approved ALP included the recommendations of the Airport Master Plan, it showed a possible future passenger terminal. That terminal is conditionally approved because it would still require a NEPA review, separate from this EA. The Airport Master Plan forecasts indicated that a level of commercial service and enplanements might occur at Paine Field, at a level greater than what could be accommodated by the existing terminal building. Consequently, during the Airport Master Plan process, area and space were reserved for a future terminal and vehicle parking facilities to accommodate that commercial service activity. See also General Response 3-5.

Following receipt of requests from Horizon Air and Allegiant Air to initiate commercial service, the County decided that a terminal facility similar to the Airport Master Plan/ALP terminal was not warranted. An alternative to the Airport Master Plan terminal building was to provide a modular expansion of the existing terminal building. This is further described on Pages B.2 through B.6 of the EA.
Two terminals would not be constructed to accommodate the proposed service at Paine Field. Rather, the modular terminal expansion of the existing terminal would be constructed instead of the future passenger terminal considered during the Master Plan process and subsequently shown on the ALP.

**3-13 What is a Class I Airport? Explanation of Federal Aviation Regulations (FAR) Part 139**

Some comments requested clarification on the term Class I airport and an explanation of Federal Aviation Regulations (FAR) Part 139.

The FAA is required by 14 CFR Part 139 to issue airport operating certificates to airports that:

- Serve scheduled and unscheduled air carrier aircraft with more than 30 seats;
- Serve scheduled air carrier operations in aircraft with more than 9 seats but less than 31 seats; and
- The FAA Administrator requires an airport to have a certificate.

In 2004, the FAA revised FAR Part 139 to create four classes of operating certificates. Prior to this revision, certificated airports could have either a full or a limited operating certificate. Paine Field has had a full operating certificate since 1974. The certificate was revised in 2005 as a Class IV certificate because at that time there were no scheduled large air carrier operations at the Airport. Part 139 does not apply to airports at which air carrier passenger operations are conducted only because the Airport has been designated as an alternate airport. Airport Operating Certificates (AOC) serve to ensure safety in air transportation. To obtain a certificate, an airport operator must agree to certain operational and safety standards and provide for such things as firefighting and rescue equipment. These requirements vary depending on the size of the airport and the type of flights available.

Class I airports include airports serving all types of scheduled operations of air carrier aircraft designed for at least 31 passenger seats (large air carrier aircraft). These airports currently hold an AOC and may serve any air carrier operations covered under Part 139. Accordingly, the operators of these airports must comply with all Part 139 requirements. The operating certificate at Paine Field would be changed to a Class I Airport as part of the proposed Federal actions assessed in the EA.

Class II airports include airports that currently hold a Limited AOC (or airports that have maintained an AOC after loss of scheduled large air carrier aircraft service) are either Class II airports or Class IV airports. Class II airports are those airports that serve scheduled operations of small air carrier aircraft and unscheduled operations of large air carrier aircraft. Class II airports are not permitted to serve scheduled large air carrier operations.

Class III airports are airports that serve only scheduled operations of small air carrier aircraft. As specified in the authorizing statute, airport certification requirements are not applicable to certain airports in the State of Alaska.
Class IV are airports that currently hold a Limited AOC (or airports that have maintained an AOC after loss of scheduled large air carrier aircraft service) are either Class II or Class IV airports. Class IV airports are those airports that serve only unscheduled operations of large air carrier aircraft. Air carrier operations are so infrequent at these airports that in the past, FAA only required them to comply with some Part 139 requirements. This continues to be the case, but new operational requirements have been added along with modifications to the Airport certification process and other administrative changes. The proposed actions in the EA include an approval to the FAR Part 139 operating certificate for Paine Field reclassifying the Airport from its existing classification as a Class IV airport to a Class I airport.

The change to a Class I airport would enable Paine Field to have scheduled air carrier aircraft operations at the Airport and Horizon and Allegiant could potentially increase operations beyond the projected number. However, if carriers other than Horizon and Allegiant would want to start service at Paine Field, additional environmental review would be required. For additional information on what other actions would require additional environmental review, please see General Response 3-14.

3-14 What actions will require additional environmental review?

Some comments asked if this would “open the door” entirely to unconstrained commercial air service actions and what would require additional environmental review prior to implementation. Such review could be one of the following levels of Federal environmental review:

- Categorical Exclusion (CatEx)
- Environmental Assessment (EA)
- Environmental Impact Statement (EIS)

Federal actions that may require further environmental review include:

- An operations specifications amendment request by another airline to begin service to Paine Field.
- An operations specification amendment to add a new aircraft type by an existing airline.
- Additional city destinations not currently covered by Horizon’s or Allegiant’s operations specifications.
- FAA funding for a new or expanded terminal building beyond that proposed in this EA or other airport facility development.

Additional service by either Horizon Air or Allegiant Air to the cities included in their request letters in Appendix A of the EA or service to other cities included in the airlines’ approved operations specifications would not constitute a Federal action and would not likely require additional environmental review unless FAA funding of further terminal expansion was required to accommodate that service or a new aircraft type was proposed.
ISSUE 4. ALTERNATIVES

4-1 Alternative airports should be used

Some comments requested that other airports, such as Sea-Tac Airport, be used in lieu of Paine Field. The airlines’ use of another airport other than Paine Field was examined as part of the Alternatives Analysis in Chapter B of the EA.

The use of other area airports by both Horizon Air and Allegiant Air in place of Paine Field is reflected in the No Action Alternative because Horizon Air already offers scheduled commercial air service at Sea-Tac Airport, approximately 30 miles south of Paine Field, and Bellingham International Airport, located approximately 74 miles north of Paine Field. Allegiant Air offers scheduled commercial air service currently at Bellingham International Airport. There has been no indication from these airlines that, should the proposed actions not be implemented, they would initiate service to any other area airport beyond those used today. Further, Snohomish County is not aware of any airport in the area with sufficient runway length that is specifically marketing itself to receive air carrier service other than the airports that Horizon and Allegiant are already operating as reflected in the No Action Alternative. Therefore, this alternative is not prudent and feasible, nor would it meet the purpose as described in Chapter A of the EA. The FAA cannot require airlines to choose one airport over another and therefore, this is not a viable alternative to the Proposed Action.

4-2 What is the relationship of the Proposed Project to WSDOT’s Long-Term Air Transportation Study (LATS)

Some comments asked about the relationship of the airline proposals and the EA to the recently completed study by the Washington State Department of Transportation (WSDOT) known as the Long-Term Air Transportation Study (LATS). LATS was a strategic planning effort based on the first comprehensive review of the aviation system in the State of Washington in over two decades. The result of the study was a set of realistic recommendations to address the state’s future aviation needs. One of the identified future aviation needs was additional airside and landside capacity for scheduled commercial air service. LATS recommended consideration of other airports in the Puget Sound Area with the potential to absorb future commercial capacity including Snohomish County Airport/Paine Field, Olympia Regional Airport, King County International Airport/Boeing Field, and Bremerton National Airport. However, the report qualified the recommendation that these airports could provide additional capacity by stating that the provision of commercial service at these airports is dependent on the interest of the airlines.

The planning process for the LATS included several regional public meetings in July 2008 and March 2009. Concern was expressed at these meetings and in written comments about the potential impacts of commercial service at Snohomish County Airport/Paine Field and at Olympia Regional Airport. Participants encouraged the Aviation Planning Council to explore non-aviation alternatives to relieve capacity for in-state travel and alternatives to airport expansion or new airport constructions. The purpose of the proposed actions at Paine Field is not to increase capacity or to provide regional capacity relief. Rather the purpose of the Federal action by the FAA is to evaluate the requests from both Horizon Air and Allegiant Air for the
FAA to amend operations specifications to allow scheduled commercial air service to Paine Field, to approve an amendment to the Federal Aviation Regulations (FAR) Part 139 operating certificate for Paine Field and the construction of the modular terminal.

4-3 What is the demand for this proposal and how does it fit with regional planning?

Some comments questioned whether regional demand was sufficient to support commercial service at Paine Field. Other comments suggested that additional regional planning and analysis of the regional demand for air service should be conducted.

The decision to initiate commercial service at an airport is a business decision by the airlines. Other than to ensure safety, neither the Airport Sponsor nor the Federal government controls where, when, and how airlines provide service. Should demand prove to be lower than that projected by the airlines, the airlines would likely choose to reduce the number of flights or cease service at Paine Field.

The purpose and need as identified in this EA is not to address the concerns related to regional demand/capacity. Rather the EA addresses the responsibility of the FAA and County in responding to the request of two carriers to begin service at the Airport. Per Council on Environmental Quality (CEQ) and FAA guidance, alternatives considered in NEPA process must address the underlying purpose or need.

In this case, the EA has considered the possible use of other airports (See General Response 4-1). However, as noted, if the carriers who are seeking to use Paine Field wished to serve other area airports they are not currently serving, they would make the request to those airports. These two airlines have identified demand for commercial air service at Paine Field and have consequently proposed to initiate service to accommodate that demand. In accordance with Federal grant assurances, the County has limited discretion to deny an airline request to operate at Paine Field. Since additional analysis on regional demand does not meet the purpose and need identified in this EA, it is not warranted.

For comments regarding the capacity at other airports, please see General Response 4-4.

4-4 Relationship between capacity at other airports and Paine Field

Some comments question the relationship between unused capacity at other airports and the proposed service at Paine Field. Comments suggested that expanded airline service at Sea-Tac Airport is a better alternative than the introduction of commercial service at Paine Field.

In regard to the recent "capacity" improvements at Sea-Tac, the third runway was not constructed to relieve or otherwise accommodate projected demand at Paine Field. The use of the third runway is separate from the purpose and need for the proposed action considered in this EA. The proposed Federal actions that are the subject of this EA respond to requests from two specific airlines to initiate service at Paine Field.
Regarding the “demand” for operations at Paine Field, the airlines’ use of another airport other than Paine Field was examined as part of the Chapter B, Alternatives Analysis, in the EA. As described in General Response 1-1, the FAA and Snohomish County cannot require an airline to serve a specific airport nor can they restrict an airline from a specific airport if the airport is a public use airport and the proposed aircraft can safely operate at that airport, regardless of which airport has more unused capacity.

4-5 Other modes of transportation may be better alternatives

Some comments suggested that either high speed rail, bus service, or other modes of transportation would be a better alternative to initiating commercial air service at Paine Field.

Use of public transit is discussed in General Response 3-9 and local public transportation is technically not an alternative to regional air service. Other modes of transportation were not considered in the alternatives analysis as they do not meet the purpose and need for the proposed Federal actions; the decision to take different forms or modes of transportation rests with the passenger, and under the current Federal regulatory process, neither the FAA or the County can require passengers to drive or take other surface modes (train or bus).

4-6 What does the term “Preferred Alternative” mean?

Some comments asked about the use of the term "Preferred Alternative."

Council on Environmental Quality (CEQ) defines the term Preferred Alternative as “the alternative which the agency believes would fulfill its statutory mission and responsibilities, giving consideration to economic, environmental, technical, and other factors.” While the Draft EA was prepared by the Airport Sponsor, it was closely coordinated with the FAA to ensure that the selection of the preferred alternative would address the FAA’s responsibilities under NEPA. The other alternatives reviewed in Chapter B of the EA were determined not reasonable as they did not meet the purpose and need. The Draft EA identified the draft Preferred Alternative so that the public and agencies would have an opportunity to comment upon that selection. A final confirmation of the Preferred Alternative will be made if the FAA accepts and signs the Final EA. The Preferred Alternative is also referred to as the Proposed Action, the project or the proposed project in the EA.

ISSUE 5. AFFECTED ENVIRONMENT/EXISTING CONDITIONS

5-1 Existing aircraft noise concerns

Some comments discussed the level of existing noise and its impact on quality of life. As stated on page C.16 of the Draft Environmental Assessment (EA), existing aircraft related noise exposure was defined in the EA through the use of noise exposure maps or contours prepared with the Federal Aviation Administration’s (FAA’s) Integrated Noise Model (INM), version 7.0a. The INM is a state-of-the-art, FAA approved software program used to model the noise exposure levels from aircraft operations and engine testing and produce contours of equal noise energy. These contours are presented using the 65 Day-Night Average Sound Level (DNL) noise contour metric where 65 DNL represents significant aircraft noise levels.

DNL metric measures the overall aircraft noise experienced during an entire (24-hour) day. DNL calculations account for the sound exposure level of aircraft, the number of aircraft operations and a penalty for nighttime operations. In the DNL scale, each aircraft operation occurring between the hours of 10 p.m. to 7 a.m. includes a sound level penalty to account for the higher sensitivity to noise in the nighttime and the expected further decrease in background noise levels that typically occur at night. DNL provides a numerical description of the weighted 24-hour cumulative noise energy level using the A-weighted decibel scale, typically over a period of a year.

Because DNL is a cumulative metric, while areas can receive single event noise levels above 65 dB, it is the average of these noise levels over the course of a year that provides for the 65 DNL contour. Although the FAA recognizes that noise occurs outside of these contours, the 65 DNL contour has been federally accepted at the level at which residential and other noise sensitive land uses are non-compatible with aircraft noise. Because the existing 65 DNL noise contour, shown on Figure C6, page C.18 of the EA, does not encompass any noise sensitive land uses (homes, schools, churches, etc.) the existing land use in the vicinity of the Airport is considered compatible with aircraft operations and aircraft generated noise under the federal guidelines.

See General Response 7-6 regarding the existing and future noise impacts.

5-2 Current curfew is broken

Some comments stated that the Airport currently operates under a noise curfew and that the curfew is already broken.

The County has a voluntary noise abatement program that discourages touch-and-go flights and repetitive training flights by jet, turboprop, and large propeller aircraft and requires air carrier aircraft with more than 30 passenger seats between 9:00 p.m. and 7:00 a.m. to receive prior permission from the Airport Director. The voluntary noise abatement program does not prevent aircraft from operating at the Airport and is not a mandatory noise curfew as suggested by some comments. The program requests those aircraft to have prior permission during those hours. Other aircraft are still allowed to depart/arrive at the Airport during those times without the request of prior permission. See also General Response 7-11.
5-3  Aircraft currently fly low and very close to houses

Some comments mentioned that aircraft already fly very low, and close to houses.

The height of aircraft on final approach to a runway or departure from a runway is controlled by the FAA. The standard traffic pattern altitude for small aircraft is 1,600 feet Mean Sea Level (MSL) while the traffic pattern altitude for large aircraft is 2,000 feet MSL. An airfield traffic pattern is a standard path followed by aircraft on takeoff or landing while maintaining visual contact with the airfield. Aircraft typically begin descending from pattern altitude in the downwind leg of the pattern when landing and on a 3-degree approach slope for the final leg of the pattern.

According to Title 14, Code of Federal Regulations, Section 91.119, *Minimum safe altitudes*; in general, there are minimum standards for operations of fixed wing aircraft (excluding when necessary for takeoff/landing). Over congested areas, an altitude of 1,000 feet above the highest obstacle within a horizontal radius of 2,000 feet is required, except for under take-off and landing procedures. Complaints on low-flying aircraft may be filed with the FAA, Office of Flight Standards, which monitors aircraft operations. Once the facts have been recorded, an FAA aviation safety inspector attempts to identify the offending aircraft operator. For more information on low flying aircraft complaints, please visit the following website: [http://www.faa.gov/about/office_org/field_offices/fsdo/](http://www.faa.gov/about/office_org/field_offices/fsdo/)

5-4  Existing Traffic

Some comments indicated that existing surface traffic in the area is already very bad and that additional traffic analysis should be included in the EA.

The surface traffic analysis was based upon the existing level of traffic compared to the future levels under the Preferred Alternative. Local jurisdictions establish thresholds which determine if a road segment or intersection is operating at an acceptable level or at a deficient level of service (see *General Response 8-1*). Currently all roads analyzed are operating at acceptable levels of service. However, there are currently two intersections that operate at deficient levels of service and a total of four intersections that are anticipated to operate at deficient levels of service in the future whether or not the proposed action is implemented. These four intersections are SR-525 at Beverly Park Road (WSDOT Intersection), SR-99 at Airport Road (City of Everett Intersection), the I-5 northbound ramps at 128\(^{th}\) Street SW/SR-96 (WSDOT intersection), and SR-525 at 84\(^{th}\) Street SW (City of Mukilteo intersection). The City of Everett has identified that capacity improvements for single-occupant vehicles to the intersection of SR-99 at Airport Road are not practical due to the existing land configuration and lack of right-of-way. The project’s impacts to the WSDOT intersections will be mitigated through the WSDOT mitigation fees in accordance with the interlocal agreement between Snohomish County and WSDOT. The City of Mukilteo intersection would operate at an acceptable level of service with optimized timings, which may occur as part of the normal maintenance of the signal. However, the traffic mitigation fees that will be paid to the City of Mukilteo will mitigate the impacts of the proposed action.
5-5 **Study Areas**

Some comments questioned the boundaries used for evaluation of various resource areas in the EA and stated that expanded study areas should have been considered. Also, some comments stated that the area identified for various resource evaluations for the EA should be the same as the Airport Influence Area, as designated in the Snohomish County 2025 Comprehensive Plan.

As stated in **General Response 1-8**, the purpose of the EA is to analyze potential environmental impacts from the proposed Federal actions in accordance with NEPA and the associated FAA Orders. These Orders include guidance for study methodologies to identify project-related effects and thresholds of significance, which result in determining resource study areas for each environmental resource category. The analysis in the EA follows those methodologies, significance thresholds, and other guidance for determining the boundaries of resource study areas as described in the EA.

The scope of each environmental resource category is slightly different and consequently, not all study areas for these resource categories are identical. For instance, two resource study areas were examined for historic/cultural resources. The first resource study area includes the direct impact area that is limited to the ground that would be affected during construction where artifacts might be located. Therefore, the study area for that resource category is limited to the direct construction impact area where the terminal footprint is proposed. However, impact on historic properties was also examined within the context of environmental affects that would occur off airport, such as aircraft noise, outside the construction footprint. Federal guidance state that noise above a 65 Day-Night Noise Level (DNL) level is not compatible with land uses such as certain historic properties, schools, and residences.

The EA does not state that noise would not occur outside the 65 DNL contour, but rather presents the area of significant noise exposure as defined by the 65 DNL and area that would be incompatible with various land uses. Changes in the noise environment would occur outside this contour with or without the proposed actions; however, the 65 DNL contour is the federally accepted threshold of the beginning of significant aircraft noise levels and therefore is the contour used to disclose any significant impacts.

Similar to historic/cultural and noise resources, study areas were also established separately for air quality, water quality, and wildlife resources among others. For instance, the resource study area for air quality was also examined within the Central Puget Sound Region airshed. Likewise, water quality impacts are considered over potentially affected watersheds, and wildlife habit impact areas are considered for the species potentially affected.

The Airport Influence Area, shown on Figure C1 of the EA, is designated in the Snohomish County 2025 Comprehensive Plan as “property within the environs of the Airport where land uses are either influenced by, or would influence the operation of the Airport in a positive or negative manner.” (See also **General Response 7-14**). The study area boundaries for the EA resource categories are those where the proposed actions would exert a change and where the context and intensity of the impact should be identified. Therefore, the resource areas for the EA were established following that guidance in accordance with the agency's guidance on the
individual environmental discipline. The Airport Influence Area does not coincide with the guidance regarding identifying study areas for resource evaluation.

5-6 Sources of existing air pollution

Some comments requested a description of existing pollution sources compared with the airport pollution sources. A number of documents identify the likely sources of emissions at airports, which typically represent the following:

- Aircraft and auxiliary power units (APU) on the aircraft
- Ground support equipment (GSE) - the vehicles that service the aircraft
- Ground access vehicles, roadways, and parking lots - the vehicles that transport passengers, employees, and goods and services that use the airport on the area roadway system
- Stationary sources - such as generators, heating and cooling systems, etc.
- Fire training
- Maintenance and construction activity

Other sources of pollution not associated with the airport and its operations are not the subject of the EA.

Information provided by the Puget Sound Clean Air Agency indicates that airport-related emissions are less than 5 percent of total Puget Sound air emissions. Surface vehicle emissions within the Puget Sound Region are the single largest source of emissions.
ISSUE 6. GENERAL PROJECT EFFECTS

6-1 Significance of Project Effects

Some comments disputed that the project-related effects would not rise to the level of the significant thresholds; comments indicated that the project would generate significant adverse effects.

As stated in General Response 1-8, the EA was prepared according to NEPA and associated FAA guidance. The Draft and Final EA identify all anticipated project-related effects associated with the proposed actions. However, while there would be project-related effects, these effects are not expected to exceed the significance thresholds identified in Appendix A of FAA Order 1050.1E, Change 1. Therefore, because these effects are not significant under NEPA, no mitigation measures are required.

6-2 How is significance defined?

Some comments suggested that either the term significance is ambiguous or that it is not well defined in the Draft EA.

FAA Order 5050.4B paragraph 9s provides the following definition:

s. Significant impact threshold. The impact level or “threshold” that the responsible FAA official uses to determine if the environmental effects of a proposed action or its reasonable alternatives would cause significant environmental effects. If FAA has established a threshold for a resource, the responsible FAA official must use that threshold to determine impact severity and context.

Note: For convenience, Table 7-1 of Chapter 7 of this Order provides the verbatim text of significant impacts in FAA Order 1050.1E, Appendix A, for many environmental resources. The Table also presents information about those thresholds to help analyze airport-related environmental impacts.

FAA defined thresholds of significance for each environmental resource category are described and explained in Appendix A of FAA Order 1050.1E Change 1. The thresholds of significance are described in Chapter D of the EA.

6-3 What are the project benefits?

Some comments questioned what the benefits of the proposed projects are and whether or not the cost outweighed the benefits.

It is important to note the purpose of the EA is not to assess the cost/benefit of the proposed actions. The effects that would be beneficial to the area are of a socio-economic nature, which are discussed in Chapter D, Environmental Consequences. The Proposed Action is not expected to significantly change the socioeconomic environment around the Airport. It would temporarily increase jobs during the construction phase and would increase use of local goods and services. There would also be a slight increase in business both at the Airport and in the vicinity of Airport Road from the increase in vehicle traffic. However, no major shifts in public service demand are expected. Overall, there would not be a significant change in the socioeconomic environment around the Airport. It is true that the airlines would likely benefit from the proposed project.
6-4  What are the quality of life impacts?

Some comments mentioned that their quality of life would be impacted due to changes in noise, air quality, and potential decreases in property value.

“Quality of life” is not a category that is specifically called out in NEPA or FAA guidance. However, the concept of quality of life is tied into several environmental resource categories addressed in NEPA documents, including noise, water quality, air quality, children’s health and safety, etc. While the proposed actions are not expected to generate significant adverse effects, there will be project-related effects. In accordance with the requirements of NEPA, the purpose of the EA is to assess and disclose the environmental impacts of the proposed action and make a determination as to the significance of the impact(s). While some of the environmental resource categories would have project-related environmental effects, as is noted in General Response 6-1, these effects would not exceed FAA defined thresholds of significance.

6-5  Are there any growth inducing or indirect effects?

Some comments asked about the secondary impacts or indirect effects of the project that could induce additional growth.

Secondary (induced) impacts are described on page D.32 of the EA. Major development projects can potentially influence induced or secondary impacts on the surrounding community. Some of these induced impacts could include the relocation of people or a substantial change to traffic patterns in the area. The analysis in the Draft and Final EA considered the induced effects of the proposed actions. Minor traffic changes are anticipated to the roadway systems in the vicinity of the Airport as presented in the Surface Transportation Section (Page D.34 of the EA) and in the Traffic Impact Analysis Report found in Appendix F, and further described in General Response 9-2. However, these traffic changes are not expected to induce growth or otherwise significantly impact the community.

The proposed actions are not considered a major development project. Due to the low number of project related commercial aircraft operations and enplanements, shifting in patterns of population movement and growth or changes in public service demands are not likely. No significant secondary impacts are expected as the result of the proposed Federal actions.

6-6  The document does not refer to “pollution”

Some comments questioned where the EA analyzed pollution impacts since the document did not refer to the word pollution.

“Pollution” is not a term used in the EA because pollution is an overarching word that refers to several separate resource categories within an EA. Pollution, by definition, could be a contamination of air, water, or soil by substances that are harmful to living organisms.4 Within

the EA, the air quality, noise, water quality, hazardous materials, and fish, wildlife and plants analysis, all address with different aspects of potential pollution. Therefore, per FAA Orders 5050.4B and 1050.1E, Change 1, impacts are examined based on those specific environmental resource categories, and not “pollution” as a whole. As stated in each of the sections within Chapter D, *Environmental Consequences*, based on federal thresholds of significance there are no expected significant environmental impacts to water quality, air quality, or noise and no significant impacts relating to hazardous materials or fish, wildlife and plants. Therefore, there are no significant impacts related to the broader category of pollution that encompasses all of the resource categories that relate to pollution.
ISSUE 7, NOISE AND LAND USE

7-1 Use of DNL

Some comments asked, “why is the Day-Night Noise Level (DNL) used as the basis for the noise analysis within the EA.”

DNL is the standard required metric for quantifying aircraft noise exposure. As a result of the 1979 Aviation Safety and Noise Abatement Act (ASNA), Congress required the FAA to select a single metric to standardize the evaluation of aircraft noise. In response to ASNA, through Federal Aviation Regulations (FAR) Part 150 Noise Compatibility Planning, FAA formally adopted DNL as its primary metric for evaluating aircraft noise to ensure consistency across the country. FAA Order 1050.1E, Change 1, Paragraph A14.1, states “For aviation noise analysis, the FAA has determined that the cumulative noise energy exposure of individuals to noise resulting from aviation activities must be established in terms of yearly day/night average sound level (DNL) as FAA's primary metric.”

DNL is the 24-hour average sound level in A-weighted decibels (dBA). This average is derived from all aircraft operations during a 24-hour period that represents an airport’s average annual operational day. DNL reflects the inclusion of a penalty to each aircraft operation occurring during nighttime hours (10 p.m. to 7 a.m.). This penalty attempts to compensate for people’s heightened sensitivity to noise during this period. Significant project-related effects are defined as impacts to noise sensitive land uses at or above the 65 DNL that experience a project-related increase of at least 1.5 DNL.

DNL contours were prepared with the FAA’s Integrated Noise Model (INM), version 7.0a. The INM is a state-of-the-art, FAA approved software program used to model the noise exposure levels from aircraft operations and engine testing and produce contours of equal noise energy. These contours are presented using the 65 DNL noise contour metric where 65 DNL represents significant aircraft noise levels, and project-related significant impacts are identified based on a project-caused increase of 1.5 DNL within the 65 DNL contour for noise sensitive land uses.

Although the FAA recognizes that noise occurs outside of these contours, the 65 DNL contour has been federally accepted as the level at which residential and other noise sensitive land uses are non-compatible with aircraft noise. Because the existing 65 DNL noise contour shown on Figure C6, page C.18 of the EA, does not encompass noise sensitive land uses (homes, schools, churches, etc.), the existing land use in the vicinity of the Airport is considered compatible with aircraft operations and aircraft generated noise under the federal guidelines.

The compatibility of various land uses with noise above 65 DNL has been based on scientific research concerning public reaction to noise exposure. The Schultz curve, predicts approximately 14 percent of the exposed population would be highly annoyed with exposure to the 65 DNL. At 60 DNL, this rate of annoyance decreases to approximately 8 percent of the population would be highly annoyed. For more information on additional requests for noise
analysis, please see **General Response 7-2**, and for more information on perception of noise and general noise methods, please see **General Response 7-3**.

### 7-2 Noise Measurements and Supplemental Metrics requested

Some comments requested that noise measurements be conducted and that alternative noise metrics (including change in decibel) be used for the analysis. As described in **General Response 7-1**, the analysis of aircraft noise exposure was prepared in compliance with Federal Aviation Administration (FAA) Orders. Those orders require the use of noise exposure contours using the FAA’s Integrated Noise Model (INM) showing the area affected by 65 Day-Night Noise Level (DNL) and greater noise levels. While alternative metrics can be informative, they are often associated with further understanding the effects associated with 65 DNL and greater sound levels when noise sensitive land uses are located within the 65 DNL noise contour. While FAA guidance indicates that the use of supplemental metrics such as Lmax and Leq is warranted in special circumstances such as areas of natural quiet or sleep disturbances, the FAA has determined that in this case, use of supplemental metrics is not warranted. For more information on noise perception, please see **General Response 7-3**. Therefore the standard DNL metric and 65 DNL threshold would be used to determine significance of the potential impacts on noise sensitive land uses.

Noise measurements, commonly referred to as noise monitoring, is a process used to confirm and verify the accuracy of the modeled contours. Noise monitoring is not a process used to test public reaction to a proposed action.

### 7-3 Noise analysis methodology

Some comments were received on the noise analysis questioning the use of the INM model, and the validity of the analysis. Other comments suggested that the analysis did not include additional noise sources such as engine run-up noise.

The noise methods used in the EA comply with the FAA environmental orders concerning aircraft noise. The noise contours were developed using the Integrated Noise Model (INM) 7.0a, which was the most current INM model at the time the report was created. The operational inputs were based on the FAA approved forecasts in **Appendix G**.

The INM model included aircraft engine run-ups that take place on the Boeing ramp on the northeast quadrant of the Airport. The “bubbling out” of the noise contour in the south central part of the Airport and to the northeast near the Boeing ramp is a result of aircraft run-ups from Boeing operations and Aviation Technical Services (ATS) operations. Because these noise events can be quite loud, they have a substantial effect on the contour, pushing the contour out to the east. However, the proposed actions are not expected to increase or change these aircraft run-ups. Taxiing operations are not included in the noise model as the INM does not model taxiing noise because it is believed to be overshadowed by landing and takeoff noise.
7-4 Flight tracks should be shown

Some comments requested that the flight tracks be shown on maps in the EA and asked if any changes would occur to the flight tracks as a result of the proposed Federal actions. In response to this request, the flight tracks are included in Figure C6 of the Final EA. Flight tracks are not expected to change with implementation of the proposed actions.

The Integrated Noise Model (INM) uses multiple input variables such as flight track data along with fleet mix, number of operations, etc. to produce noise contours. The flight track data from the Part 150 Study was used in preparing the noise contours for the Draft and Final EA. Data from the Part 150 included both flight track location and flight track use by type of aircraft. There would not be any change to the flight tracks as a result of the Proposed Action.

7-5 Proposed commercial fleet mix

Some comments were about the type of aircraft proposed for commercial service. Some comments suggested that the Allegiant MD83 aircraft should not be allowed to operate at Paine Field because of the noise levels that it generates.

The fleet mix used in evaluating the proposed actions in the EA was based upon communications with both Horizon and Allegiant. Horizon plans on using the Q400 for the proposed service at Paine Field and Allegiant plans on using the MD83. The Integrated Noise Model (INM) noise contours were completed based on these aircraft types and therefore the contours take into account the relative “noisiness” of each aircraft. Horizon also listed the CRJ 700 as a substitution aircraft for scheduling conflicts, so 1% of the Horizon traffic was modeled for that aircraft. Both turboprops and jets already operate at Paine Field.

In the early 1980s, the FAA began issuing rules and regulations that control aircraft noise at the source, the aircraft fuselage and engines. These aircraft noise standards established by the federal government must be met by aircraft manufacturers through newly-designed engines and aircraft. The government established timetables for airlines to comply with these noise standards, commonly known as Stage 1, Stage 2, Stage 3, and Stage 4 (in the international area these stages are referred to as Chapter 1 through 4).

Full compliance with Stage 2 standards was established in January 1, 1988 (Federal Aviation Regulations (FAR) Part 36). Subsequent to this timeframe, Congress passed the Airport Noise and Capacity Act of 1990 [ANCA], PL 101-508, 104 Stat. 1388, which established two broad directives for the FAA. The first directive established a method to review aircraft noise and airport use or access restrictions imposed by airport proprietors, and the second was to institute a program to phase-out Stage 2 aircraft over 75,000 pounds by December 31, 1999. In early 2000, the International Civil Aviation Organization established the Stage 4 requirements that require newly manufactured aircraft engines to meet Stage 4 levels by December 31, 2006.
To implement ANCA, the FAA amended FAR Part 91 and issued a new FAR Part 161. Part 91 addresses the phase-out of large Stage 2 aircraft and the phase-in of quieter Stage 3 aircraft. FAR Part 161 was promulgated as a stringent review and approval process for implementing use or access restrictions by airport proprietors, such as curfews and caps on operations.

This is in keeping with one of the major reasons for ANCA, which was to discourage local restrictions more stringent than ANCA’s 1999 Stage 2 phase-out. Part 161 makes it more difficult for airports or any others to implement use or access restrictions, especially those associated with Stage 3 aircraft. These difficulties are so significant that to date there has been only one Part 161 plan approved by the FAA. This plan was approved for Naples Airport in Florida for restricting Stage 2 smaller aircraft (under 75,000 pounds). Worth noting, airport/aircraft use restrictions in place at airports before the passage of ANCA were “grandfathered” and therefore allowed to remain in place as long as the airports did not modify the restrictions making them more stringent. Airports and state and local governments are preempted from regulating the operations of aircraft, with one exception. They may exclude aircraft from an airport for noise reasons as long as the exclusion is reasonable and nondiscriminatory. In addition, it must comply with the provisions of the ANCA, through FAR Part 161, and it must not regulate military aircraft. In 2005, the FAA adopted a new noise standard for jet airplanes that ensures the latest available noise reduction technology be incorporated into new designs. This noise standard, Stage 4, applies to any person submitting an application for a new airplane type design on after January 1, 2006.

The Q400 is a Stage 4 aircraft and the MD 83 is a Stage 3 aircraft. Therefore they meet all noise regulations related to aircraft stages.

7-6 **What are the existing and future noise impacts?**

Some comments stated that the existing noise is already intolerable, and mentioned that the proposed project would only make the problem worse and open the floodgates for even more noise. The comments also indicated that the analysis was flawed and did not represent the true change in noise.

The analysis of aircraft noise exposure in the EA was prepared in compliance with FAA Orders 1050.1E, Change 1 and 5050.4B. Those orders require the use of noise exposure contours using the FAA’s Integrated Noise Model (INM) showing the area affected by 65 Day-Night Noise Level (DNL) and greater noise levels.

The FAA and the County have taken steps over the years to assess existing levels of aircraft noise and develop noise abatement procedures to reduce the impacts on residential and other noise sensitive areas. As a result, under current conditions (without aircraft operating in commercial service at Paine Field) there are currently no noise sensitive uses exposed to 65 Day-Night Noise Level (DNL) noise levels at Paine Field. This existing 65 DNL noise contour is shown in Figure C6, page C.18 of the EA. The 65 DNL does not encompass any noise sensitive land uses (homes, schools, churches, etc.). Therefore, as described in **General Response 5-1**, the existing land use in the vicinity of the Airport is considered compatible with aircraft operations and aircraft generated noise according to Federal guidelines.
With the proposed actions, a slight change in noise would occur increasing the 65 DNL contour by approximately 17 acres in 2018. As seen starting on page D.21 of the Final EA, the proposed actions and their associated projects would not result in noise sensitive uses within the 65 DNL noise exposure contour. Because no significant noise impacts would occur to sensitive land uses within the FAA defined thresholds of significance (65 DNL contour), no mitigation is required. For more information on the use of DNL please see General Response 7-1 and for more information regarding noise perception compared to this significance analysis, please see General Response 7-3.

7-7 Noise impacts on schools

Some comments stated that there will be impacts on schools from increased noise as a result of the Proposed Action.

As stated in General Response 7-1, the noise and land use impact analysis presented in the document were prepared in accordance with Federal guidelines and showed that while aircraft noise would change slightly with the proposed project (increasing the 65 DNL contour by approximately 17 acres in 2018), there would continue to be no noise sensitive uses exposed to 65 Day-Night Noise Level (DNL) or greater noise levels. No schools would be exposed to 65 DNL or greater noise levels with or without the proposed actions. Part 150 Land Use Compatibility Guidelines indicate that schools are compatible with aircraft noise levels less than 65 DNL. For comments regarding the use of additional noise metrics in the analysis, please see General Response 7-2.

7-8 Where are the schools located on the noise map?

Some comments requested that the locations of the schools be included in the EA.

In response to these comments, the locations of the schools have been placed on the noise exposure maps for both existing and future base case and with project scenarios in the Final EA. Please see Figures C4, and D1 through D6 of the Final EA. As described in General Response 7-2, use of the Lmax or Leq metric would not be warranted in this case. See General Response 7-7 for information regarding the noise impacts on schools.

7-9 What are the health effects of noise?

Some comments were received questioning the impacts of noise on public health. According to various studies and scientific research, noise can have varying effects on people. From these effects, criteria have been established to help protect the public health and safety and prevent disruption of certain human activities. These criteria are based on effects of noise on people, such as hearing loss (not a factor with typical community noise), communication interference, sleep interference, physiological responses, and annoyance.

The health effects were taken into account when the FAA was required by Congress, through the Aviation Safety and Noise Abatement Act (ASNA) of 1985, to select one metric for describing aircraft noise levels. As stated in General Response 7-1, the FAA selected the use of the Day-Night Noise Level (DNL), which is required for use in FAA NEPA documents. The DNL
reflects the Schultz curve, which predicts that approximately 14 percent of the exposed population would be highly annoyed with exposure to the 65 DNL. This annoyance level has been correlated to health effects due to stress; hearing loss would not be expected at sound levels experienced off-airport in the vicinity of Paine Field. The Proposed Action would not subject any noise sensitive land uses to exposure of 65 DNL or greater; therefore, no significant project-related noise impacts are expected.

As stated above, noise is known to have adverse effects on people and these effects have helped establish criteria to protect the public health and safety and prevent disruption of certain human activities. These criteria are based on effects of noise on people, including hearing loss, communication interference, sleep interference, physiological responses, and annoyance. Each of these potential noise impacts is briefly discussed in the following points:

- **Hearing Loss** is generally not a concern in community/aircraft noise situations, even when close to a major airport or a freeway. The potential for noise induced hearing loss is more commonly associated with occupational noise exposure in heavy industry; very noisy work environments with long-term, sometimes close-proximity exposure; or, certain very loud recreational activities such as target shooting, motorcycle, or car racing, etc. The Occupational Safety and Health Administration (OSHA) identifies a noise exposure limit of 90 dBA for eight hours per day to protect from hearing loss (higher limits are allowed for shorter duration exposures). Noise levels in neighborhoods near airports, even in very noisy neighborhoods, do not exceed the OSHA standards and are not sufficiently loud to cause hearing loss.

- **Communication Interference** is one of the primary concerns with aircraft noise. Communication interference includes interference with hearing, speech, or other forms of communication such as watching television and talking on the telephone. Normal conversational speech produces sound levels in the range of 60 to 65 dBA, and any noise in this range or louder may interfere with the ability of another individual to hear or understand what is spoken. There are specific methods for describing speech interference as a function of the distance between speaker, listener, and voice level. The following figure entitled QUALITY OF SPEECH COMMUNICATION IN RELATION TO THE DISTANCE BETWEEN THE TALKER AND THE LISTENER\(^5\) shows the relationship between the quality of speech communication and various noise levels.

\(^5\) **Source:** *Noise Effects Handbook, EPA*
• **Sleep Interference**, particularly during nighttime hours, is one of the major causes of annoyance due to noise. Noise may make it difficult to fall asleep, create momentary disturbances of natural sleep patterns by causing shifts from deep to lighter stages, and may cause awakenings that a person may not be able to recall.

Research has shown that once a person is asleep in their own home, it is much more unlikely that they will be awakened by a noise. Some of this research has been criticized because it has been conducted in areas where subjects had become accustomed to aircraft noise. On the other hand, some of the earlier laboratory sleep studies have been criticized because of the extremely small sample sizes of most laboratory studies and because the laboratory was not necessarily a representative sleep environment.

An English study assessed the effects of nighttime aircraft noise on sleep in 400 people (211 women and 189 men; 20-70 years of age; one per household) living at eight sites adjacent to four U.K. airports, with different levels of night flying. The main finding was that only a minority of aircraft noise events affected sleep, and, for most subjects, that domestic and other non-aircraft factors had much greater effects. As shown in the following figure entitled **CAUSES OF REPORTED AWAKENINGS**, aircraft noise is a minor contributor among a host of other factors that lead to awakening response.

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6 **Source:** Federal Interagency Committee on Aviation Noise (FICAN), 1997
Likewise, the Federal Interagency Committee On Noise (FICON) in a 1992 document recommended that sleep disturbance be assessed based on laboratory studies of sleep disturbance. This review was updated in June 1997, when the Federal Interagency Committee on Aviation Noise (FICAN) replaced the FICON recommendation with an updated curve based on the more recent in-home sleep disturbance studies. The FICAN recommended consideration of the "maximum percent of the exposed population expected to be behaviorally awakened," or the "maximum awakened."

The FICAN recommendation is shown in the following figure entitled **RECOMMENDED SLEEP DISTURBANCE DOSE-RESPONSE RELATIONSHIP** along with a more common statistical curve. The differences indicate, for example, a 10% awakening rate at a level of approximately 100 dB SEL, while the "maximum awakened" curve prescribed by FICAN shows the 10% awakening rate being reached at 80 dB SEL. (The full FICAN report can be found on the internet at [www.fican.org](http://www.fican.org)). Sleep interference continues to be a major concern to the public and an area of debate among researchers.
RECOMMENDED SLEEP DISTURBANCE DOSE-RESPONSE RELATIONSHIP

Physiological Responses reflect measurable changes in pulse rate, blood pressure, etc. Generally, physiological responses reflect a reaction to a loud short-term noise, such as a rifle shot or a very loud jet over flight. While such effects can be induced and observed, the extent to which these physiological responses cause harm is not known.

Annoyance is the most difficult of all noise responses to describe. Annoyance is an individual characteristic and can vary widely from person to person. What one person considers tolerable may be unbearable to another of equal hearing capability. The level of annoyance also depends on the characteristics of the noise (e.g., loudness, frequency, time, and duration), and how much activity interference (e.g., speech interference and sleep interference) results from the noise. However, the level of annoyance is also a function of the attitude of the receiver. Personal sensitivity to noise varies widely. It has been estimated that two to 10 percent of the population are highly susceptible to annoyance from noise not of their own making, while approximately 20 percent are unaffected by noise. Attitudes are affected by the relationship between the listener and the noise source (Is it your dog barking or the neighbor's dog?). Whether one believes that someone is trying to abate the noise will also affect their level of annoyance.
7-10  What potential exists for a project related increase in vibrations?

Some comments stated that aircraft noise associated with Paine Field causes vibrations in homes and some of the comments stated that these homes are located outside of the 65 Day-Night Noise Level (DNL) contour. Some comments stated objections to the potential vibrations that could result from additional aircraft activity as a result of the Proposed Action.

As shown on Figure C6 of the EA, there are no homes or other noise sensitive land uses located within the 65 DNL or greater noise exposure contour. Residences in the vicinity of Paine Field are subject to vibration associated with existing aircraft. The vibrations are caused by waves of energy emitted from both aircraft engines and the physical airframe of the aircraft as they pass through the air. Vibration, sufficient to cause structural damage, typically only occurs in areas of close proximity to the runway end, usually with areas exposed to 80 DNL and greater sound levels. As 80 DNL conditions do not occur outside the immediate confines of the runway ends at Paine Field, no adverse vibration effects sufficient to result in damage or hazards would be expected.

7-11  Call for noise curfew/activity restrictions

Some comments called for a noise curfew, or for activity restrictions or other measures to mitigate the impacts of the proposed project and general noise at the Airport.

Because there are no noise sensitive land uses within the 65 Day-Night Noise Level (DNL) and there are no project-related effects that rise to the level of being significant, no mitigation measures are required. See General Response 1-5.

In terms of restrictions or curfews, the Airport Noise and Capacity Act (ANCA) of 1990 restricted local Airport Sponsor’s ability to impose a curfew or restrict activity at a public use airport. Restrictions or required curfews can put an unreasonable burden on interstate commerce (which is an area of regulation reserved for the Federal government), and also results in discriminatory regulation that violates the tenets of the constitution. Therefore, these types of restrictions cannot be put into place at a public use airport. However, in 1997, the Airport enacted a voluntary noise abatement procedure for large commercial aircraft with more than 30 passengers from 9 p.m. to 7 a.m., where aircraft cannot land or take off without receiving prior permission from the Airport. This procedure is voluntary since ANCA makes it impossible to impose a required curfew or activity restriction and it also serves as a safety measure to inform pilots of potential head to head conflicts when the tower is closed. See also General Responses 2-1 and 5-2.

7-12 How are the potential noise impacts compatible with surrounding residential land uses?

Some comments questioned how the potential project-related aircraft noise impacts can be compatible with surrounding residential land uses.

The FAA selected the use of the Day-Night Noise Level (DNL) noise metric, which is required for use in FAA NEPA documents. See General Response 7-1.

In accordance with the land use compatibility guidelines as defined in 40 Code of Federal Regulations (CFR) Part 150, certain land uses are compatible with various noise exposure levels. Most notably, residences, schools, churches, and other noise sensitive uses are compatible with noise levels less than 65 DNL (See Figure D7 in the Final EA). As shown in the Draft and Final EA, no noise sensitive uses would be affected by 65 DNL or greater noise levels. However, please see General Response 7-3 regarding people’s perception of noise.

7-13 What is the effect of the proposed project on parks?

Some comments stated that the proposed actions would have an impact on parks in the community.

Figure D7 of the EA shows land uses, including parks, relative to various levels of aircraft noise. Recreational uses of all kinds are compatible with noise below 65 Day-Night Noise Level (DNL). While there would be a project-related increase in noise to several parks in the airport vicinity, because no parks or recreation facilities are located in areas with noise exposure above 65 DNL, FAA land use compatibility guidelines indicate that the existing and future noise exposure with the proposed actions would be compatible with the anticipated noise. Therefore, no significant project-related impact to these parks is expected. For more information on noise see General Response 7-1.

7-14 What is the Airport Influence Area?

Some comments stated that the Airport Influence Area was designated by the local government to be an area appropriate for residential development, and that because of this designation, local officials had promised that commercial service would not occur at Paine Field.

The Airport Influence Area is defined in the Snohomish County General Policy Plan as “the property within the environs of the airport where land uses are either influenced by, or will influence, the operation of the airport in a positive or negative manner.” As described in General Response 5-5, the Airport Influence Area does not relate to the EA thresholds of significance or project area boundaries. The Airport Influence Area includes the Land areas within the Federal Aviation Regulations (FAR) Part 77 conical and approach surfaces within three miles from the ends of the Airport’s runways. The Airport Influence Area was not a consideration of the Mediated Role Determination.
ISSUE 8, TRAFFIC

8-1 Traffic analysis

Some comments were received questioning the validity of the surface traffic impact analysis.

The traffic impact analysis for the proposed action (“the project”) was performed in accordance with Snohomish County’s requirements for new developments and the interlocal agreements between Snohomish County and WSDOT and the City of Mukilteo. Snohomish County does not have an interlocal agreement with the City of Everett and therefore the City of Everett’s SEPA traffic impact analysis requirements for developments were used when determining the scope of analysis required for the trips generated by the project impacting City of Everett intersections. Reviewing jurisdictions generally require impacts to be analyzed during the typical PM peak-hour (within the 4:00 PM to 6:00 PM time period) and sometimes the AM peak-hour (within the 7:00 AM to 9:00 AM time period). Snohomish County, WSDOT, the City of Mukilteo and the City of Everett do not require analysis of impacts during Boeing shift-changes, peak ferry times, during holidays or other non-typical peak times. In addition, the daily count data along 128th Street SW (the closest Snohomish County critical arterial unit) shows that the 4:00 PM to 6:00 PM traffic volumes are the highest volumes during the day. Snohomish County and the surrounding jurisdictions do not have a weekend or holiday peak analysis requirement for this area since the standard weekday commuter peaks typically have higher traffic volumes than weekends in the study area and seasonal peaks are only for 2-3 months of the year.

The exact schedule for the flights is not currently known. Therefore, to analyze the highest impact scenario it was assumed that the peak trip generation of the project would occur during the existing weekday commuter peaks (7:00 AM to 9:00 AM and 4:00 PM to 6:00 PM). This analysis timeframe was scoped with Snohomish County during the traffic scoping meeting held on September 17, 2009. During the scoping process the distribution of trips and intersections/arterials that were required to be analyzed were also determined.

The peak trip generation of the project assumes that during a 60-minute period the following trips will occur:

- One Horizon Air turn, all passengers arriving and departing
- One Allegiant Air turn, all passengers arriving and departing
- A quarter of the 17 employees will arrive and a quarter of the 17 employees will leave

These Paine Field trip generation assumptions were compared to the operations at Bellingham International Airport, which serves Horizon Air and Allegiant Air. It was found that the time between a full turn for Horizon Air and Allegiant Air at Bellingham is closer to two hours. Therefore, the assumption that all of the Paine Field trips will occur during one hour is conservatively high.

The trip generation calculations for the proposed action were also compared to the analysis performed by The Transpo Group for the Bellingham International Airport, dated November 2009. The Bellingham International Airport analysis shows that the existing 1,100 daily
enplanements, which equates to approximately 385,000 annual enplanements, generates 131 PM peak-hour trips. In comparison, the proposed action is anticipated to have 238,200 annual enplanements in 2018, approximately 40% fewer enplanements than the existing annual enplanements at Bellingham International Airport. However, the anticipated peak-hour trip generation for the proposed action is 212 PM peak-hour trips, which are 60% more trips from 40% fewer enplanements. The trip generation calculations performed for the proposed action are also similar to the maximum peak-hour trip generation calculations that were calculated by Hirsh Associates in their analysis. The three comparisons of the peak-hour trip generation of the project show that the trip generation is conservatively high.

All of the trips generated by the proposed action (i.e. trips to and from the new terminal) were assumed to be new trips to the road system for the purposes of performing the level of service analysis. This assumption that all trips are new, despite the fact that it is likely that the project will divert some existing trips to Paine Field from Sea-Tac International Airport and Bellingham International Airport that are presently traveling along the local road system, represents the highest impact scenario. The diversion of trips on a microscopic scale, intersection by intersection, is nearly impossible to determine. However, the diversion of trips can be calculated on a macroscopic level, the level at which the VMT analysis was performed, since the macroscopic level analysis is performed over a large area and is not based on turning movement volumes at specific intersections. A diversion of trips has therefore not been included in the level of service analysis for the traffic impact analysis. This assumption means that all of the trips generated to the project are new to the analyzed intersections and arterials, which represents the highest estimate of the impacts of the project.

The analysis of the impacts of the development are based on the Snohomish County and City of Everett standards for all developments and the interlocal agreements between Snohomish County and WSDOT and the City of Mukilteo and City of Everett standards for all developments. WSDOT, the City of Mukilteo and the City of Everett evaluate impacts of a development based on the operation of intersections. Snohomish County evaluates the impacts of a development based on the operation of arterial segments. The level of service criteria for WSDOT, City of Mukilteo and City of Everett intersections is summarized in Table 1, which is consistent with Table 1 of the traffic impact analysis.
Table 1: Level of Service Criteria for Intersections

<table>
<thead>
<tr>
<th>Level of Service</th>
<th>Expected Delay</th>
<th>Unsignalized Intersections</th>
<th>Signalized Intersections</th>
</tr>
</thead>
<tbody>
<tr>
<td>A</td>
<td>Little/No Delay</td>
<td>≤10</td>
<td>≤10</td>
</tr>
<tr>
<td>B</td>
<td>Short Delays</td>
<td>&gt;10 and ≤15</td>
<td>&gt;10 and ≤20</td>
</tr>
<tr>
<td>C</td>
<td>Average Delays</td>
<td>&gt;15 and ≤25</td>
<td>&gt;20 and ≤35</td>
</tr>
<tr>
<td>D</td>
<td>Long Delays</td>
<td>&gt;25 and ≤35</td>
<td>&gt;35 and ≤55</td>
</tr>
<tr>
<td>E</td>
<td>Very Long Delays</td>
<td>&gt;35 and ≤50</td>
<td>&gt;55 and ≤80</td>
</tr>
<tr>
<td>F</td>
<td>Extreme Delays⁹</td>
<td>&gt;50</td>
<td>&gt;80</td>
</tr>
</tbody>
</table>

The City of Mukilteo and the City of Everett have a level of service threshold of LOS D for the operation of their intersections. WSDOT has a level of service threshold of LOS D for intersections along SR-525 and SR-526 and a threshold of LOS E for I-5 interchange ramps.


⁹ When demand volume exceeds the capacity of the lane, extreme delays will be encountered with queuing which may cause severe congestion affecting other traffic movements in the intersection.

LOS A: Free-flow traffic conditions, with minimal delay to stopped vehicles (no vehicle is delayed longer than one cycle at signalized intersection).

LOS B: Generally stable traffic flow conditions.

LOS C: Occasional back-ups may develop, but delay to vehicles is short term and still tolerable.

LOS D: During short periods of the peak hour, delays to approaching vehicles may be substantial but are tolerable during times of less demand (i.e. vehicles delayed one cycle or less at signal).

LOS E: Intersections operate at or near capacity, with long queues developing on all approaches and long delays.

LOS F: Jammed conditions on all approaches with excessively long delays and vehicles unable to move at times.
The level of service criteria for Snohomish County arterials is summarized in Table 2, which is consistent with Table 2 of the traffic impact analysis.

**Table 2: Level of Service Criteria for Arterials**

<table>
<thead>
<tr>
<th>Level of Service</th>
<th>Expected Delay</th>
<th>Average Arterial Speed (miles per hour)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>Urban, Category II</td>
</tr>
<tr>
<td>A</td>
<td>Little/No Delay</td>
<td>&gt; 35</td>
</tr>
<tr>
<td>B</td>
<td>Short Delays</td>
<td>&gt; 28</td>
</tr>
<tr>
<td>C</td>
<td>Average Delays</td>
<td>&gt; 22</td>
</tr>
<tr>
<td>D</td>
<td>Long Delays</td>
<td>&gt; 17</td>
</tr>
<tr>
<td>E</td>
<td>Very Long Delays</td>
<td>&gt; 13</td>
</tr>
<tr>
<td>F</td>
<td>Extreme Delays</td>
<td>≤ 13</td>
</tr>
</tbody>
</table>

Snohomish County has a level of service threshold of LOS E for the operation of their arterials. There are two arterials that are Urban Category II arterials:

- Arterial Unit #227 – Beverly Park Road, SR-525 to Airport Way
- Arterial Unit #231 – Airport Road, 106th Street SW to Kasch Park Road

The only Urban Category III arterial impacted by the project is:

- Arterial Unit #228 – Airport Road/128th Street SW, SR-99 to I-5 Southbound Ramps

The analysis of the Snohomish County arterials is based on a model that has been calibrated to field collected data to ensure that the model accurately represents the existing operation of the arterial and can accurately predict the operation with the additional traffic.

It should be noted that Arterial Unit #223 was analyzed as part of the traffic impact analysis in the Draft EA, but not the Final EA. This arterial was no longer a critical arterial unit at the time of the traffic impact analysis included in the Final EA.

A scoping meeting was held with Snohomish County staff on September 17, 2009 and a scoping memorandum was received from WSDOT. Scoping discussions were held with City of Everett staff and a scoping request was made to the City of Mukilteo, but a response from the City of Mukilteo was never received. These scoping discussions were performed to, in part, determine the scope of analysis required for the project. The interlocal agreement between Snohomish County and WSDOT sets a threshold of 10 total PM peak-hour trips for analysis of WSDOT intersections. The following WSDOT intersections, designated by their associated study intersection numbers, are impacted with 10 or more PM peak-hour development trips and were analyzed as part of the traffic impact analysis:
4. SR-525 at Beverly Park Road  
12. I-5 Southbound Ramps at 128th Street SW  
17. I-5 Northbound Ramps at 128th Street SW  
20. Airport Road at SR-526 Westbound Ramps

Additional WSDOT intersections were not analyzed since the either did not meet the threshold of 10 PM peak-hour trips or were not requested by WSDOT for analysis during the scoping process. A review letter from Lorena Eng of WSDOT, dated January 20, 2010, agreed with the analysis of impacts to WSDOT intersection.

The interlocal agreement between Snohomish County and the City of Mukilteo requires arterial intersections impacted with 10 or more directional PM peak-hour trips to be analyzed. The only City of Mukilteo intersections meeting this criteria that will be impacted by 10 or more directional PM peak hour trips from the project, designated by their associated study intersection numbers, are:

21. SR-526/Paine Field Boulevard at 84th Street SW  
22. 44th Avenue W at 84th Street SW  
23. SR-525 at 84th Street SW

The Traffic Impact Analysis included these intersections.

Snohomish County and the City of Everett do not have an interlocal agreement. However, impacts to City of Everett intersections have been analyzed following the City of Everett SEPA impact threshold of 50 PM peak-hour trips. The intersection of the SR-526 westbound ramps at Evergreen Way which is a City of Everett intersection, was also analyzed at the request of WSDOT even though it is not impacted with 50 PM peak-hour trips. The following City of Everett intersections, designated by their associated study intersection numbers, were analyzed as part of the traffic impact analysis:

5. Beverly Park Road at Airport Road  
6. SR-99 at Airport Road  
18. Airport Road at 112th Street SW  
19. Airport Road at Casino Road  
24. SR-526 Westbound Ramps at Evergreen Way

The project does not impact any other City of Everett intersections with 50 or more PM peak-hour trips. A review letter, dated February 3, 2010, from Allan Giffen, the SEPA Responsible Official of the City of Everett, agreed with the analysis of impacts to City of Everett intersection. The traffic impact analysis determined that the project’s impacts to these arterials and intersections would decrease the travel speed on the arterials and add delay to the intersections. However, the analysis showed that the project will not have a significant impact on the surrounding roadways since the project will not cause any of the arterials or intersections to change from an acceptable level of service without the project to an unacceptable level of service with the project. This increase in delay is not anticipated to significantly affect emergency vehicles that will use the major roadways in the site vicinity, especially since Snohomish County
provides pre-emptive operation for emergency vehicles. The increase in delay is also not anticipated to significantly change the existing travel patterns since the project will not cause any arterials or intersections to operate at a deficient level of service.

The project will add trips to one City of Everett intersection, SR-99 at Airport Road, one City of Mukilteo intersection, SR-525 at 84th Street SW, and two WSDOT intersections, SR-525 at Beverly Park Road and 128th Street SW at the I-5 northbound ramps, which will operate at LOS F without the addition of the project and will meet the respective impact thresholds for the jurisdiction. The City of Everett did not require mitigation for impacts to this intersection since capacity improvements for single-occupant vehicles are not practical. The City of Everett supported the recently implemented Swift bus rapid transit as its strategy for multi-modal transportation improvements to this corridor and is in the process of evaluating the entire Evergreen Way corridor in this area for comprehensive transportation enhancements. The project will be contributing mitigation fees as part of the WSDOT traffic mitigation fees to aid in funding improvements to the I-5/128th Street SW interchange, per the interlocal agreement and WSDOT comments and the intersection of SR-525 at Beverly Park Road is at its ultimate configuration. The City of Mukilteo intersection of SR-525 at Beverly Park Road is anticipated to operate at a deficient level of service under the 2018 with project conditions and the existing signal timings. However, the intersection is anticipated to operate at an acceptable level of service under the 2018 with project conditions if the signal timings are optimized. Traffic mitigation fees are proposed to be paid to the City of Mukilteo that will help mitigate the impacts to City of Mukilteo roadways.

The calculated peak-hour trip generation for the Paine Field project, which is used for all of the impact analysis in the traffic impact analysis, has been shown to be consistent with the trips generated at Bellingham International Airport for a Horizon Air and Allegiant Air arrival and departure over approximately 2 hours. The peak-hour trip generation of the project is therefore conservatively high since it has been assumed that all of the trips will occur in 1 hour, as opposed to 2 hours. This assumption is also consistent with the analysis in the Hirsh Associates report (Appendix K of the Draft EA and Final EA). The peak-hour trip generation is also higher than the peak-hour trip generation that would be calculated using the Institute of Transportation Engineers trip generation data.

8-2 Why weren’t diverted trips accounted for?

Some comments questioned why the analysis did not account for diverted trips. Diversions are expected. However, it is not possible to determine on an intersection-by-intersection basis the diverted traffic. Evaluating diversions would require knowing, on a neighborhood-by-neighborhood and street-by-street basis, how many passengers are likely to use Paine Field instead of Sea-Tac International Airport or Bellingham International Airport. The FAA determined that such micro level scale location information was not available and thus, the impact analysis should focus on a conservative evaluation. For these reasons a diversion of trips (reduction in trips) was not applied to the microscopic analysis that is required for the traffic impact analysis. Therefore, a conservative analysis of the impacts of the project was used.
ISSUE 9. SOCIOECONOMIC

9-1 What is the impact upon property values?

Some comments expressed concern that the proposed actions would have a negative impact on property values in the area.

A limited number of studies have attempted to measure the impact of aircraft noise on property values. No specific studies of the impact of noise at Paine Field on real property values have been conducted. Studies conducted at other airports have concluded that airport noise has only a slight impact on property values within the 65 Day-Night Noise Level (DNL) or greater noise contour. Additionally, comparison of older studies to more recent studies indicates that the impact was greater in the 1960’s, when jet aircraft first entered the fleet, than in the 1980’s or 1990’s. This presumably is the result of stabilization of real estate markets following an initial adjustment to noisier jets, and of noise reduction in more modern Stage 3 planes.

An FAA summary report on aviation noise effects states:

"Studies have shown that aircraft noise does decrease the value of residential property located around airports. Although there are many socio-economic factors which must be considered because they may negatively affect property values themselves, all research conducted in this area found negative effects from aviation noise, with effects ranging from 0.6 to 2.3 percent decrease in property value per decibel increase of cumulative noise exposure ... The studies can be divided into two groups and some conclusions drawn. The first group of estimates ... was based on 1960 data (and included New York, Los Angeles and Dallas) and suggests a range of 1.8 to 2.3 percent decrease in value per decibel (DNL). The second group of estimates, covering the period from 1967 to 1970, suggests a mean of 0.8 percent devaluation per decibel change in DNL. The bottom line is that noise has been shown to decrease the value of property by only a small amount -- approximately 1 percent decrease per decibel (DNL). At a minimum, the depreciation of a home due to aircraft noise is equal to the cost of moving to a new residence. Because there are many other factors that affect the price and desirability of a residence, the annoyance of aircraft noise remains just one of the considerations that affect the market value of a home."10

One of the difficulties in evaluating the effect of aircraft noise on property values is the application of findings from one location to another. The Effect of Airport Noise on Housing Values, a report prepared in 1994 by Booz-Allen & Hamilton for the FAA, outlined a viable method of examining the effects of airport noise on housing values at the national level by using an approach referred to as the "neighborhood pair model." A series of studies conducted at Baltimore-Washington International, Los Angeles International, and New York LaGuardia and Kennedy International Airports determined that the neighborhood pair model can be used to establish the boundaries of the effect that airport noise has on housing values at a given airport. However, Booz-Allen recommended that their approach not be used at this time to determine property values.

In the Summary and Conclusions section of the report, it was stated "the magnitude of this impact [of noise on property values] cannot be estimated at the national level at this time, since the results varied across a wide range for the Airports studied, and only a small sample of airports was considered."

9-2 Indirect/induced traffic effects

Some comments questioned the evaluation of indirect and induced impacts, specifically relative to traffic.

The evaluation of indirect and induced impacts was conducted in accordance with FAA Orders 1050.1E Change 1 and 5050.4B. Major development projects can potentially influence induced or secondary impacts on the surrounding community. Some of these induced impacts could include relocation of people or a substantial change to traffic patterns in the area. Minor traffic changes are anticipated to the roadway systems in the vicinity of the Airport as presented in the Surface Transportation section of the EA (Page D.34) and in the Traffic Impact Analysis Report found in Appendix F. Growth induced impacts are addressed in General Response 6-6, job impacts and socioeconomic impacts are addressed in General Response 9-3.

9-3 Socioeconomic Impacts

Some comments generally questioned what socioeconomic impacts would occur as a result of the proposed actions. Other comments questioned what impacts the proposed actions would have on the community, specifically in terms of jobs.

According to FAA Order 1050.1E Change 1, a socioeconomic impact is significant if it requires extensive relocation, with insufficient replacement housing available, extensive relocation of community business that would cause severe economic hardship for affected communities, disruption of local traffic patterns that substantially reduce the Levels of Service (LOS) of roads serving the airport and its surrounding communities, or a substantial loss in community tax base. As stated in the Final EA, an increase in the number of jobs and use of local goods and services as a result of the Proposed Action can be expected. The proposed actions would specifically generate additional jobs, payroll, and expenditures in the airport vicinity. It is estimated that 6 to 10 airline jobs would be created. However, some of these employees (such as fuel service providers) may be existing Fixed Base Operator (FBO) contracted employees. It is also estimated that up to 17 new Transportation Security Administration (TSA), rental car, and maintenance jobs would be permanently created at the Airport. There was concern from some commenters that these jobs created would be “lower-paying jobs,” and this issue is addressed in General Response 9-7.

Because the Proposed Action would not require relocation of businesses or residences, there would be no significant change in either the tax base or the economic vitality of the area. No significant impacts on property values are expected and therefore, no induced impacts resulting from a negative change in the tax base are expected. There would be a slight change in traffic as described in General Responses 8-1 and 9-2, but this impact would not be significant.
9-4 **E.O. 13045 Children’s Health and Safety impact analysis**

Some comments stated that children’s health and safety were not analyzed in the EA.

The analysis of impacts to children’s health and safety was prepared in accordance with FAA Orders 1050.1E Change 1 and 5050.4B. Per Executive Order 13045, Protection of Children from Environmental Health Risks and Safety Risks Federal agencies:

(a) shall make it a high priority to identify and assess environmental health risks and safety risks that may disproportionately affect children; and

(b) shall ensure that its policies, programs, activities, and standards address disproportionate risks to children that result from environmental health risks or safety risks

The analysis of children’s health and safety was included in the EA and can be found on page D.32 of the Final EA. In response to comments, the locations of schools were added to the noise contour figures in the EA (General Response 7-8). There are no anticipated significant noise impacts on schools (General Response 7-7 and see Figures D1 through D6 of the Final EA) and there are no other general effects on schools regarding air quality, water quality or other resources which could affect the health of children or impact schools. Because there are no significant adverse impacts (including noise) to any population groups or neighborhoods according to FAA defined thresholds of significance, there are no significant adverse impacts or disproportionate impacts to children’s health or safety.

9-5 **Environmental Justice**

Some comments stated that the EA did not address environmental justice or special population issues.

Executive Order 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations directs federal agencies to identify and address, as appropriate, disproportionately high and adverse human health or environmental effects of its actions on minority populations and low-income populations. The effects of the proposed actions were addressed in the Draft and Final EA in the section titled Socioeconomic Environment, Environmental Justice, and Children’s Environmental Health and Safety Risks.

There are no significant impacts to any population group or neighborhoods based on the 65 Day-Night Noise Level (DNL) noise contour and the FAA’s threshold of project-related significance; consequently, there can be no disproportionate adverse effects to special population groups, minority populations or low-income populations. The “project area” in the EA either refers to the actual construction footprint of the modular terminal and/or the 65 DNL noise contour. While there are special population groups in the surrounding community, there are no special population groups or neighborhoods located within the direct impact area (construction footprint) or within the 65 DNL noise contour (the indirect impact area); therefore there would not be any significant direct or indirect impacts on special population groups or neighborhoods. No land acquisition is associated with the Proposed Action and the only off-airport effects of the Proposed Action are in the areas of surface transportation and noise. No significant impacts are
expected and no improvements are required for the roadway system as a result of the increased traffic attributable to the Proposed Action and the 65 DNL noise contour remains primarily on airport property and does not encompass any residential development.

9-6 What is the impact of the project on crime?

Some comments stated that the proposed actions will increase crime in the community.

There is no known published research that would indicate a correlation between the initiation of commercial air service or conduct of commercial aviation and local crime or prostitution. Therefore, it is not possible to evaluate such conditions relative to the proposed actions.

9-7 Project will bring in lower income people and low paying jobs

Some comments stated that the proposed actions will bring in lower income people and low paying jobs that would have a negative impact on the community.

The proposed actions are not expected to alter population patterns in the airport area, as the actions are not expected to result in residential or business displacements or result in a material change in employment patterns. The jobs that would be created as a result of the Proposed Action are expected to have a positive impact on the local community. See also General Response 9-3 on the number of created jobs resulting from the proposed actions. No negative socioeconomic impacts are expected to result from jobs, which would help stimulate the economy. Also see General Response 9-1 concerning perceived loss in property values and General Response 9-4 regarding general socioeconomic impacts.

9-8 What are the health and quality of life effects associated with the project?

Some comments stated that the proposed actions will have an adverse effect on health and quality of life.

“Health” is not a category that is specifically called out in NEPA or FAA NEPA guidance. However, each of the environmental resource categories addressed in the EA can be related back to health effect. For example, in the area of air quality, the national ambient air quality standards are established by the USEPA to protect public health and welfare. Thus, the air quality evaluation considers the effects of the proposed actions relative to these standards. Similarly, FAA’s consideration of aircraft noise exposure ensures the protection of public health and also the compatibility of land uses with various sound levels. Each section in Chapter D of the EA discusses the environmental resources. As noted, in accordance with FAA NEPA guidance, the project-related effects of the proposed actions are not expected to exceed the FAA’s thresholds of significance, and thus, no significant health-related effects are expected.
ISSUE 10, AIR QUALITY/EMISSIONS

10-1 Greenhouse gas/climate change

Some comments requested that the EA address project-related greenhouse gas emissions and climate change.

In response to these comments and in close coordination with the Puget Sound Clear Air Agency, the FAA included the following discussion in the Final EA:

In January 2012, the FAA issued FAA Order 1050.1E Change 1 Guidance Memo #3 titled "Considering Greenhouse Gases and Climate Change under the National Environmental Policy Act (NEPA): Interim Guidance". This section addresses the effects of the proposed actions at Paine Field in accordance with the FAA guidance.

Of growing concern is the impact of proposed projects on climate change. Greenhouse gases are those that trap heat in the earth's atmosphere. Both naturally occurring and anthropogenic (man-made) greenhouse gases include water vapor (H₂O), carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), and ozone (O₃).

Research has shown that there is a direct link between fuel combustion and greenhouse gas emissions. Therefore, sources that require fuel or power at an airport are the primary sources that would generate greenhouse gases. Aircraft are probably the most often cited air pollutant source, but they produce the same types of emissions as cars. Aircraft jet engines, like many other vehicle engines, produce CO₂, water vapor, nitrogen oxides, carbon monoxide, oxides of sulfur, unburned or partially combusted hydrocarbons [also known as volatile organic compounds (VOCs)], particulates, and other trace compounds.

According to most international reviews, aviation emissions comprise a small but potentially important percentage of human-made greenhouse gases and other emissions that contribute to global warming. The Intergovernmental Panel on Climate Change (IPCC) estimates that global aircraft emissions account for about 3.5% of the total quantity of greenhouse gas from human activities. In terms of relative U.S. contribution, the U.S. General Accounting Office (GAO) reports that aviation accounts “for about 3% of total U.S. greenhouse gas emissions from human sources” compared with other industrial sources, including the remainder of the transportation sector (23%).

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12 All greenhouse gas inventories measure carbon dioxide emissions, but beyond carbon dioxide different inventories include different greenhouse gases (GHGs).
13 Several classes of halogenated substances that contain fluorine, chlorine, or bromine are also greenhouse gases, but they are, for the most part, solely a product of industrial activities. For example, chlorofluorocarbons (CFCs) and hydrochlorofluorocarbons (HCFCs) are halocarbons that contain chlorine, while halocarbons that contain bromine are referred to as bromofluorocarbons (i.e., halons) or sulfur (sulfur hexafluoride: SF₆).
and industry (41%). The 2012 USEPA nationwide inventory of greenhouse gas emissions, notes that aviation-related emissions represented about 2.1% of emissions. That report also found "Across all categories of aviation, CO2 emissions decreased by 20.6 percent (36.9 Tg) between 1990 and 2010.”

The scientific community is developing areas of further study to enable them to more precisely estimate aviation's effects on the global atmosphere. The FAA is currently leading and participating in several efforts intended to clarify the role that commercial aviation plays in greenhouse gas emissions and climate change. The most comprehensive and multi-year program geared towards quantifying climate change effects of aviation is the Aviation Climate Change Research Initiative (ACCRI) funded by FAA and NASA. ACCRI will reduce key scientific uncertainties in quantifying aviation-related climate impacts and provide timely scientific input to inform policy-making decisions. FAA also funds Project 12 of the Partnership for Air Transportation Noise & Emissions Reduction (PARTNER) Center of Excellence research initiative to quantify the effects of aircraft exhaust and contrails on global and U.S. climate and atmospheric composition.

Aviation activity levels and airport development projects have the potential to both affect climate change and be affected by climate change. Changes to generation and/or use of natural resources such as air quality and energy supply can potentially affect climate change (e.g., by increasing the amount of greenhouse gases emitted), but projects can also be impacted by climate change (e.g., rising sea levels). At this point, there is no consistent scientific indication of when and how the climate will change.

Research has shown that there is a direct link between fuel combustion and greenhouse gas emissions. Therefore, sources that require power/fuel at an airport are the primary sources that would generate greenhouse gases. Aircraft are probably the most often cited air pollutant source, but they produce the same types of emissions as cars. Based on FAA data, operations activity at Snohomish County Airport, relative to aviation throughout the United States, represents less than 1% of U.S. aviation activity. Therefore, assuming that greenhouse gases occur in proportion to the level of activity, greenhouse gas emissions associated with existing and future aviation activity at the Airport would be expected to represent less than 0.03% of U.S.-based greenhouse gases. Therefore, emissions of greenhouse gases from this project are not expected to be significant.

As discussed above, changes to resource categories such as air quality and natural resources and energy supply can potentially affect climate change (e.g., by increasing the amount of greenhouse gases emitted), but projects can also be impacted by climate change (e.g., rising sea levels). At this point, there is no consistent scientific indication of when and how the climate will change.

16 Inventory of U.S. Greenhouse Gas Emissions and Sinks: 1990-2010, United States Environmental Protection Agency, Report EPA 430-R-12-001, April 15, 2012; page 3-13/
The EA adequately addresses FAA guidance and requirements for Air Quality and Climate Change. There is no FAA requirement for GHG quantitative evaluation. At this time a full airport and project-related greenhouse gas inventory has not been prepared. However, parts of the information are available, and others will be generated when the County prepares its Washington State Environmental Policy Act (SEPA) documentation. The following data is available:

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>CO2 Operational Emissions (Tons)</th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>No Action</td>
<td>Preferred Alternative</td>
<td>Project-Related Emissions</td>
</tr>
<tr>
<td><strong>Year 2008</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Aircraft</td>
<td>17,068</td>
<td>NA</td>
<td>NA</td>
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<tr>
<td>Ground Service Vehicles</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
</tr>
<tr>
<td>Ground Access Vehicles</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
</tr>
<tr>
<td>Total</td>
<td>17,068</td>
<td>NA</td>
<td>NA</td>
</tr>
<tr>
<td><strong>Year 2013</strong>*</td>
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<td></td>
<td></td>
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<tr>
<td>Aircraft</td>
<td>23,527</td>
<td>25,159</td>
<td>1,632</td>
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<td>Ground Service Vehicles</td>
<td>NA</td>
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<tr>
<td>Ground Access Vehicles</td>
<td>NA</td>
<td>1,260</td>
<td>1,260</td>
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<td>Construction</td>
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<tr>
<td>Total</td>
<td>23,527</td>
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<tr>
<td><strong>Year 2016</strong></td>
<td></td>
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<td></td>
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<tr>
<td>Aircraft</td>
<td>23,424</td>
<td>27,276</td>
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<tr>
<td>Ground Access Vehicles</td>
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<td>1,713</td>
<td>1,713</td>
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<tr>
<td>Total</td>
<td>23,424</td>
<td>24,696</td>
<td>5,565</td>
</tr>
<tr>
<td><strong>Year 2018</strong></td>
<td></td>
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<tr>
<td>Aircraft</td>
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<td>27,283</td>
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<tr>
<td>Total</td>
<td>23,432</td>
<td>29,449</td>
<td>6,017</td>
</tr>
</tbody>
</table>

BridgeNet Consulting Services, July 2012 Using EDMS 5.1.3; Surface emissions: Synergy Consultants, July 2012. Note that EDMS is not able to quantify CO2 emissions from GSE and CO2 emissions for ground access vehicles assumes no diverted trips. GAV calculated assuming average MPG of 22.5 and 19.56 lbs of CO2 per gallon fuel. * Project-related emissions for 2013 are conservative and assume a full year of operations in addition to construction of the proposed terminal.
10-2 Air quality conformity

Some comments stated that the EA did not address general conformity or fully address air quality impacts.

The General Conformity Regulation requirements of the Clean Air Act (40 Code of Federal Regulations (CFR) Part 93) are very clear. Any actions of the federal government must be shown to conform with the State Implementation Plan (SIP) for the area. In undertaking a conformity analysis, the conformity regulations identify the steps of the process, which first starts with a determination of whether or not the regulation applies, through the preparation of an applicability analysis. If the total project-related emissions are less than the de-minimis threshold for the pollution, a conformity determination is not required. The Draft and Final EA contain that applicability analysis. Because the Puget Sound Region is in attainment for all pollutants, but is subject to a maintenance plan for carbon monoxide, the conformity analysis is only required for that pollutant. The de-minimis threshold for a carbon monoxide maintenance area is 100 tons of project-related emissions per year. (40 CFR Part 93.153(b)(2). The air quality modeling indicated that the proposed project would not trigger the de-minimis threshold (i.e. the project would produce less than 100 tons of project-related emissions per year).

In response to questions and comments about the emissions being low because the evaluation only focused on the proposal by two carriers, it is important to understand the basis by which NEPA documents are prepared. Council on Environmental Quality (CEQ) regulations implementing NEPA requires that NEPA documents address impacts that are "reasonably foreseeable".

Federal Aviation Administration (FAA) Order 5050.4B Paragraph 9q defines reasonably foreseeable as:

An action on or off-airport that a proponent would likely complete and that has been developed with enough specificity to provide meaningful information to a decision maker and the interested public. Use the following table to help determine if an action is reasonably foreseeable.

(footnote 4: Paragraph 905.c(1) and (2) provide definitions of “connected actions” and “similar actions,” respectively)

Similar to the requirements of NEPA, the General Conformity Regulations also contain a related definition. 40 CFR 93.153 defines "reasonably foreseeable emissions" as:

... are projected future indirect emissions that are identified at the time the conformity determination is made; the location of such emissions is known and the emissions are quantifiable, as described and documented by the Federal agency based on its own information and after reviewing any information presented to the Federal agency.

While the action of constructing a new modular terminal is reasonably foreseeable, and thus is ripe for consideration in the EA, how and when activity levels may change beyond that
predicted by the two proposing airlines is not foreseeable. Such information is required to evaluate the environmental effect. To disclose the effects of activity at the maximum capacity of the proposed terminal, the Final EA includes Appendix P. It is important to note that some commenters indicated that the proposing carriers may increase their activity to that capacity level, or that additional carriers may choose to operate at Snohomish County Airport. The results of the impact evaluation would differ based on the fleet mix assumptions and activity assumptions of the carriers operating. Appendix P describes one such scenario. Without a clear understanding of the carriers that would be operating in a specific timeframe, the impacts on air quality could not be identified, as emissions vary based on aircraft type and the associated engines. For these reasons, the FAA determined that such conditions are not reasonably foreseeable and therefore will not be modeled or assessed in this EA.

10-3 Outdated model: EDMS

Some comments indicated concern with the modeling process and use of an outdated model in the EA to assess air quality conditions.

At the time the analysis was initiated, it was conducted using the most recent version of the model required by the FAA for use in NEPA documents – the FAA’s Emissions Dispersion Modeling System (EDMS). This is the same model used by the Puget Sound Clean Air Agency (PSCAA) in preparing inventories for airports that are represented in the maintenance plan/State Implementation Plan (SIP). FAA Order 1050.1E Change 1 Appendix A.2.2 notes: “In conducting air quality analysis for purposes of complying with NEPA or conformity, the FAA requires use of the Emissions and Dispersion Modeling System (EDMS) model for aviation sources (aircraft, auxiliary power units, and ground support equipment).”

The emissions inventory presented in the Draft EA was prepared using FAA’s EDMS version 5.1. Preparation of the Draft EA was initiated in early 2009. At that time, Version 5.1 was the most recent version of EDMS offered by FAA. Subsequently, the FAA issued Version 5.1.3. As noted on the FAA’s web site, Version 5.1.3 corrected several output reports associated with the FAA’s Voluntary Airport Low Emission (VALE) grant program, which is not related to analysis used in this EA. However, because a new forecast was prepared the most recent version of the EDMS was used.

FAA Order 1050.1E Appendix A.2 states:

2.4c. Modeling Requirements. The EDMS is FAA’s required methodology for performing air quality analysis modeling for aviation sources. EDMS also offers the capability to model other airport emission sources that are not aviation-specific, such as power plants, fuel storage tanks, and ground access vehicles. (underline added)

2.4d. Except for air toxics or where advance written approval has been granted to use an equivalent methodology and computer model by the FAA Office of Environment and Energy, the air quality analyses for aviation emission sources from airport and FAA proposed projects conducted to satisfy NEPA, general conformity, and 49 USC 47106(c) requirements under the Clean Air Act Amendments of 1990 (as amended) must be
prepared using the most recent EDMS model available at the start of the environmental analysis process. In the event that EDMS is updated after the environmental analysis process is underway, the updated version of EDMS may be used to provide additional disclosure concerning air quality but use is not required. (Underline added)

Although the consultant had already completed the emissions inventory modeling, due to public comments, the EDMS model was re-run with the most recent version of the model, EDMS 5.1.3. The quality modeling results presented in the Final EA reflect the analysis using the most recent version of the model.

EDMS was accepted as an U.S. Environmental Protection Agency (EPA) “Preferred Guideline” model in 1993 under Title 40 CFR part 51 Appendix W. In 2005 the FAA and EPA recognized that EDMS employs a suite of standalone compliance models already listed in the “Preferred Guideline” such as MOBILE6.2, NONROAD, AERMOD, AERMET, and AERMAP. Consequently, EDMS was relocated to section 6.2.4 “Modeling Guidance for Other Governmental Programs” in 40CFR51 Appendix W to coincide with FAA’s policy that EDMS is the required model to assess airport emissions.

10-4 Would there be an increase in fuel dump/fuel smell/residue?

Some comments stated that there would be added fuel dump, smell and residue as a result of the proposed project. Rarely does fuel dumping actually occur. If an aircraft needs to jettison fuel, it is in an emergency situation. Most aircraft have the capability of taking off with more weight than they can safely land with. This means that in an emergency situation after takeoff, the aircraft would need to reduce its weight to make a safe return landing. Depending on the nature of the emergency, the pilot has two options, either jettison fuel or fly in a holding pattern until enough fuel has been burned to reduce the weight to below the maximum certified gross landing weight. According to federal directive 7110.65T paragraph 9-4-1 through 9-4-4, aircraft may dump fuel as necessary in a declared emergency state. There are no restrictions as to where the aircraft may or may not dump fuel. However, each airspace area has a recommended, pre-designated fuel dumping area for instances where fuel needs to be dumped if time permits. 7110.65T states controllers are to "assign an altitude at least 2,000 feet above the highest obstacle within 5 miles of the route or pattern being flown." For the Central Puget Sound Region, this is typically over Puget Sound at an altitude of above 5,000 feet to allow time for the fuel to evaporate before reaching the ground, and to prevent non-evaporated fuel from reaching populated areas. Because any fuel release is irregular and restricted to emergency conditions, impacts to human or natural habitats would be minimal and rare.

It is important to note that not all aircraft even have the capability to jettison fuel. Some are designed and stressed to be able to takeoff and land with the same weight, so fuel jettisoning is not necessary. Boeing information indicates that fuel dumping is not available on the MD80 aircraft as this aircraft is designed with a high landing weight.

Citizens also noted that soot or particles are deposited on their property due to aircraft flights. The FAA has conducted soot analysis at many airports across the country with the uniform result that samples collected on and near the airport bore little chemical resemblance to either unburned
jet fuel or soot from jet exhaust. Instead, the collected material was found to be chemically similar to general urban pollution, particles from burning heavy fuels, and motor vehicle exhaust.

Odors from aircraft typically have more of an oily smell versus an odor like one would experience when fueling an auto. The pollutants that comprise this type of smell are accounted for in the air pollutant assessment presented in the Environmental Assessment (EA) for precursor pollutants -- pollutant levels where the standards exist to protect human health and welfare.

There are many different types of odorous hydrocarbon compounds in jet exhaust which may be responsible for periodic “odor episodes”. Typically, the most reactive or “volatile” hydrocarbons have the most potential to cause odor (i.e., cause a detectable odor at a lower concentration). The principal odor-causing hydrocarbon species in jet exhaust are the aromatic (fuel-related) and oxygenated (partially burned) hydrocarbons. Hydrocarbon emission rates are greatest during the low-power idle and taxi modes of the Landing-Take-Off (LTO) cycle, when the engines are not operating as efficiently. During takeoff and climbout, for example, hydrocarbon emissions are greatly reduced since the engines operate with greater efficiency.

The most recent study concerning odors from jet engine exhaust was conducted at Boston’s Logan Airport (“Identification of Odorous Compounds From Jet Engine Exhaust at Boston’s Logan Airport”, December, 1992). Based on air monitoring at Boston Logan, three compounds - acetaldehyde, formaldehyde, and naphthalene - were present on a consistent basis above their respective odor recognition thresholds. Each of these compounds could be generated by the incomplete combustion of jet fuel. The odor impact depends on wind speed and direction, turbulence, and distance between the source and nearby residents. The odor recognition characteristics of these compounds is generally characterized as follows: Acetaldehyde is described as sweet, “apple ripened” and pungent; Formaldehyde is described as odor like hay, straw-like, and pungent; Naphthalene is described as having odor like tar, creosote, and mothballs.

As noted by the Boston study, the results were based on the minimum detectable limits because overall concentrations for these compounds were generally small. Additionally, no specific source or activity was identified as the primary source of these compounds. Moreover, the Boston study notes that motor vehicle exhaust also contains many of these same compounds. No conclusion was drawn as to the source, concentration, or potential impact to human health.

The air quality modeling within the EA covers many of the pollutants that relate either directly or indirectly to fuel “smells,” and covers all the pollutants regulated federally that relate to human health. Since the project does not trigger any federal thresholds of significance for air quality for these pollutants, there are no significant impacts relating to the air quality.

10-5  Question regarding the analysis of PM_{10} and PM_{2.5}

Some comments stated that particulate matter needed to be rigorously analyzed in the EA. The EA considered emissions of particulate matter within the evaluation capabilities of the models that are required for use (Emissions Dispersion Modeling System – EDMS). The inventory presented in the EA considered the two particulate matters for which there are national ambient
air quality standards (PM\textsubscript{10} and PM\textsubscript{2.5}). The Environmental Protection Agency (EPA) has
designated the Snohomish County as attainment for both PM\textsubscript{10} and PM\textsubscript{2.5}.

The EPA, Washington State Department of Ecology, and the Puget Sound Clean Air Agency
(PSCAA) conduct measurements throughout the State for purposes of monitoring compliance
with the National Ambient Air Quality Standards (NAAQS). The closest air quality monitoring
station to Paine Field is located in Marysville (7th Ave) about 10 miles north of the Airport, and
Lynnwood (on 212th) about 9 miles south of the Airport. Two other sites also measure
concentrations in Snohomish County – Darrington (Fir Street) and Woodinville. Both of these
monitoring sites measure PM\textsubscript{2.5} concentrations. The 2007 Air Quality Data Summary Report\textsuperscript{17} by
the PSCAA states:

\begin{quote}
The agency, along with partners, continued to monitor the region’s air quality in 2007. Over the last decade, criteria air pollutant concentrations for some pollutants have fallen well below levels of concern in our jurisdiction. For example, levels of carbon monoxide, a pollutant that the region was formerly in nonattainment for, have fallen to levels so low that the Washington State Department of Ecology discontinued many of the monitors in 2006 in order to focus its monitoring resources on higher priority pollutants.

The same is true for the criteria pollutants sulfur dioxide, lead, and nitrogen dioxide. While the area enjoys improving air quality, we are facing new challenges. After more than a decade of attaining all federal standards, the agency faces nonattainment, potentially in multiple areas, for PM\textsubscript{2.5} and ozone. This is due to recent revisions to the national fine particulate and ozone standards to better protect public health…. ... sites in Snohomish and King Counties are close to the daily fine particle federal standard. ... While efforts to reduce fine particulate emissions will be tailored to different areas, they generally target wood smoke emissions reductions, as the highest PM\textsubscript{2.5} levels occur in heating months when wood stoves and fireplaces contribute the majority of PM\textsubscript{2.5}. (Page 3)
\end{quote}

Relative to particulate emissions, the PSCAA has noted that “Concentrations at the Marysville
and Darrington monitors, both in Snohomish County, are on the brink of violating the new daily
standard” (35 μg/m\textsuperscript{3} which was adopted in 2006). Daily PM\textsubscript{2.5} measurements in Snohomish
County have shown that measurements at Lynnwood have not exceeded the federal standard
since measurements began in 2002, but measurements at Maryville equaled or exceeded the
standards between 2001 and 2007, except in 2006. Relative to the annual PM\textsubscript{2.5} standard,
measurements at the two Snohomish County sites have been below the standard between 2001
and 2007. PSCAA notes that the primary contributor to PM emissions is from residential wood
stoves and fireplaces.

\textsuperscript{17} Puget Sound Clean Air Agency, 2007 Air Quality Data Summary,
The air quality modeling within the EA covers the analysis for both PM$_{10}$ and PM$_{2.5}$. Since the project does not trigger any federal thresholds of significance for air quality for these pollutants, there are no significant impacts relating to the air quality under NEPA.

**10-6 Toxics/HAPS**

Some comments addressed hazardous air pollutants (HAPs) and their potential increase due to the proposed project. FAA guidance states:

e. Airport-related hazardous air pollutants (HAPs). The Environmental Protection Agency (EPA) has identified roughly 25 individual HAPs that are associated with emissions from aircraft and airport ground service equipment (GSE). However, EPA does not specify aircraft and airports in the definitions and categories of HAP sources in Section 112 of the Clean Air Act (CAA) (“Hazardous Air Pollutants”). Nor has EPA established standards for HAPs. When compared with existing urban backgrounds, air quality monitoring studies near several large airports have not shown that increased HAP levels occur near those facilities. In fact, only a small percentage of an urban area’s overall air pollution is attributable to airport emissions. Nevertheless, due to the emission levels of unburned hydrocarbons and particulates near airports, EPA’s National Air Toxic Program notes that airports are complex facilities that emit HAPs.

Therefore, to comply with NEPA’s disclosure requirements, FAA reports HAPs emissions in its environmental documents for information purposes only. FAA does not use that information to assess human health risks. The responsible FAA official should consider whether 40 CFR Section 1502.22, which addresses incomplete and unavailable information, applies to HAPs emissions for major airport development projects.

(1) For major projects normally requiring an EIS (e.g., new airport, new runway, major runway extension), the responsible FAA official should decide, in consultation with Federal, State, and local air quality agencies whether it is appropriate to conduct a HAPs emission inventory. This is, especially so when the action would occur in areas that are classified as nonattainment or maintenance for O3 or particulate matter (PM).
(2) As needed, consult APP-400 to determine the HAPs FAA will analyze and the methodology FAA will use to conduct that analysis.

In 2003, the Puget Sound Clean Air Agency (PSCAA) completed a toxics evaluation for the Puget Sound region. Relative to airports, the following was concluded:

Emissions from the two airports (Sea-Tac and Boeing Field) could impact the Sea-Tac and Georgetown monitors. However, the results do not reflect significantly higher pollutant levels at these locations when compared with other sites. In fact, SeaTac potential risks appear slightly lower than Beacon Hill. It is possible that the airport emissions do not significantly impact the monitors because the emissions are diluted over the area. It is also possible that the pollutants of concern at the airport are not those included in the monitoring study.
Because of this information, the FAA did not feel that the evaluation of HAPs would be warranted.
ISSUE 11, OTHER RESOURCE CATEGORIES

11-1 What is the impact on wildlife?

Some comments stated that there would be impacts on wildlife as a result of the proposed actions.

Potential action-related impacts to wildlife as a result of the Proposed Action were assessed in Chapter D of the EA in accordance with FAA Order 1050.1E Change 1. There are no endangered, threatened, or special status species or habitat in the study area. The area of direct effect is located entirely on airport property and consists of pre-disturbed ground that does not contain any native habitats. No natural habitats would be impacted by the construction activities. Concerns were raised over the project study area of potential effect with respect to wildlife, suggesting that wildlife outside of airport property and construction area could be impacted, especially with respect to areas within the flight pattern from aircraft activities or noise.

Public observations of special status species were located outside the project area. Because the area of construction consists of pre-disturbed ground on airport property, and because flight paths would not change, it was determined that no substantial impacts to wildlife would occur to species outside the construction area. Additionally, no significant impacts are expected with respect to air quality, noise, wetlands or water quality that would affect surrounding habitats on or off airport property that would warrant examining a larger biotic project area or require a large-scale survey. No habitats would be affected, and according to FAA Orders, no additional coordination with the U.S. Fish and Wildlife Service is required.

Although there are documented special status species, such as the Bald Eagle and Spotted Owl within Snohomish County, the Proposed Action is not expected to alter any important natural habitat of any kind. According to FAA Order 1050.1E Change 1, for federally listed species, a significant impact would occur if, “a proposed action would likely jeopardize a species’ continued existence or destroy or adversely affect a species’ critical habitat.” Since the Proposed Action would not destroy any natural habitat, and there are no significant indirect impacts from changes in noise, air quality, wetlands, or water quality, there are no expected significant impacts to Federally-listed species. For non-listed species, FAA Order 1050.1E, Change 1, states that the FAA should “consider scientific literature on and information from agencies having expertise on addressing the affected species. Consider information on: project effects on population dynamics; sustainability; reproduction rates; natural and artificial mortality (aircraft strikes); and the minimum population size needed to maintain the affected population.” As stated above, while there would be an increase in the number of flights, the additional aircraft operations would use the same flight paths that are currently used today. Therefore, there are no significant impacts to fish, wildlife or plants as a result of the Proposed Action.

Additionally, the Airport discourages the siting of land uses (such as ponds) that are wildlife (specifically bird) attractants through a provision within the Snohomish County 2025 Comprehensive Plan’s designated Airport Influence Area. This applies directly to the area on the Airport and immediately surrounding the Airport due to the safety risks of bird strikes. This provision does not pertain to the natural features outside this direct area, such as the ravines,
bluffs, and hillsides within a larger area around the Airport. It is merely a pre-existing means to prevent aircraft/wildlife safety issues. The Airport regulates wildlife through its Wildlife Hazard Management Plan, which pertains to wildlife on airport property. No changes in this policy would occur as the result of the Proposed Action and the continued management of wildlife on airport property would not change. The Airport has no authority over the preservation of open spaces within the County, and can only manage wildlife and wildlife attractants within airport property. Additionally, the Proposed Action would not result in the removal of any trees.

11-2 Migratory Bird Treaty Act and ESA threshold of effect were not considered

Some comments stated that the EA did not address the Migratory Bird Treaty Act or the Endangered Species Act.

The Migratory Bird Treaty Act (MBTA) was not specifically discussed in the Draft EA as the proposed actions will not affect migratory birds. As outlined in FAA Order 1050.1E, Change 1, MBTA prohibits private parties (and depending on the judicial circuit, federal agencies), from “intentionally taking a migratory bird, their eggs, or nest. Take is defined as ‘pursue, hunt, shoot, wound, kill, trap, capture, or collect’ (50 CFR 10.21). The MBTA prohibits taking, selling or other activities that would harm migratory birds, their eggs or nests unless the Secretary of the Interior authorizes such activities under a special permit.”

Because there are no migratory birds known to be located within the construction area, no migratory birds would be intentionally taken or impacted as a result of the Proposed Action. Therefore, there would be no significant impacts to migratory birds under the MBTA and coordination with the U.S. Fish and Wildlife Service is not required.

The endangered, threatened, and special status species impacts are described in Chapter D, Environmental Consequences. FAA Orders 1050.1E, Change 1 and 5050.4B require FAA to make an affect determination for Federally-listed species. If the FAA determines that the Proposed Action may affect a Federally-listed species or critical habitat, then further consultation with the U.S. Fish and Wildlife Service is required. If the FAA determines that the Proposed Action would not affect a Federally-listed species or critical habitat, consultation with the U.S. Fish and Wildlife Service is not required.

Based on regular on-airport surveys, there are no endangered, threatened, or special status species that are known to be permanent residents in the project area, the area where the proposed terminal would be completed. There is also no known habitat of importance to any special status species within the project area. Of all the species listed during the weekly surveys, only two special status species were observed (the Bald Eagle and Peregrine Falcon). The Peregrine Falcon was observed only once since 2001 and the Bald Eagle observations are infrequent.

According to FAA Order 1050.1E, Change 1, for federally listed species, a significant impact would occur if, “a proposed action would likely jeopardize a species’ continued existence or destroy or adversely affect a species’ critical habitat.” The area of direct effect is located entirely on airport property and consists of pre-disturbed ground that does not contain any native habitats. No natural habitats would be impacted by the construction activities. Concerns were raised over
the project area of potential effect with relation to special status species, suggesting that wildlife outside of the airport property and construction area could be impacted, especially with respect to areas within the flight pattern from aircraft activities, noise, air pollution or water quality impacts that could occur outside of the area of direct impact. Public observations of special status species such as the Spotted Owl were located entirely outside the project area. Because the area of construction is within pre-disturbed ground on airport property and the additional aircraft operations would use the same flight paths that are currently used today, it was determined that no significant impacts to wildlife would occur to species outside the construction area.

11-3 **What is the potential for additional bird strikes?**

Some comments expressed concern over the safety of commercial service operations in an area with birds and the potential for additional bird strikes.

The Airport discourages the siting of land uses (such as ponds) that are wildlife (specifically bird) attractants through a provision within the Snohomish County 2025 Comprehensive Plan’s designated Airport Influence Area. This applies directly to the area on the Airport and immediately surrounding the Airport due to the safety risks of bird strikes. This provision does not pertain to the natural features outside this direct area, such as the ravines, bluffs, and hillsides within a larger area around the Airport. It is merely a pre-existing means to prevent aircraft/wildlife safety issues.

The Airport attempts to control wildlife through its Wildlife Hazard Management Plan, which pertains to wildlife on-airport property that could be a risk to aircraft safety. Snohomish County contracts with the United States Department of Agriculture to manage wildlife on airport property. While there would be an increase in the number of flights as a result of the Proposed Action, the additional aircraft would use the same flight paths that are currently used today. The Proposed Action is not expected to increase bird strikes at the Airport.

11-4 **Effect on culture of local community**

Concerns were raised on the change in local community culture as the result of the Proposed Action and that the EA “disregarded the culture of the local community.”

Following FAA Order 1050.1E, Change 1 guidance, impacts to local communities are generally analyzed based on the significance of noise impacts or required relocations that could fracture a community or otherwise disrupt the community physically or economically. Aircraft noise already exists from current operations, although no noise sensitive uses are located in significant aircraft noise exposed areas. The proposed actions are not expected to generate significant aircraft noise exposure (See General Response 7-6). No homes, businesses or other community resources would need to be relocated (See General Response 9-4). Additionally, no historic, cultural, architectural or archaeological sites are located within the project’s area of potential effect (APE). No significant health effects are anticipated (See General Response 9-9). No significant impacts on children’s health of safety or schools are anticipated (General Response...
9-5). Therefore, no significant impact on the local community or cultural values is expected as a result of the Proposed Action.

11-5  What are the health impacts compared to safety?

Some comments expressed concern with health and safety of the community relating to the proposed addition of commercial service at Paine Field.

The continuing mission of the FAA is to provide the safest, most efficient aerospace system in world. Air carriers and airports must meet various safety certifications and operating requirements required by the FAA. Both Horizon Air and Allegiant Air currently meet FAA safety certification requirements and air worthiness standards for their respective fleets.

As stated in General Response 9-9, because no significant adverse impacts were identified, there are no predicted significant impacts to human safety, or health as a result of the Proposed Action. Safety is further described in General Response 11-6.

11-6  Safety: No mention of accident history or airline safety

Some comments were received on the safety of initiating commercial service at Paine Field, specifically about the lack of discussion in the EA on accident history of the airlines or overall airline safety.

The continuing mission of the FAA is to provide the safest, most efficient aerospace system in world. Air carriers and airports must meet various safety certifications and operating requirements required by the FAA. Both Horizon Air and Allegiant Air are in good standing and meet current safety certification requirements and air worthiness standards for their respective fleets. Paine Field meets all applicable FAA standards.

11-7  Security: terrorist attack

Some comments questioned the security of adding commercial service to Paine Field, citing the fact that commercial service aircraft have been used for terrorist activity.

The Transportation Security Administration (TSA) protects the nation’s transportation systems to ensure freedom of movement for people and commerce. Security screening (including both passenger and baggage screening) associated with the proposed commercial service would be conducted by TSA using all required technology and equipment. For more information on general safety issues, please see General Response 11-6.

11-8  Cumulative impacts

Some comments suggested that the overall cumulative impacts of the proposed Federal actions were not adequately assessed in the Draft EA, while others suggested that the future timeframe for the assessment of impacts (2016) was not appropriate and that an additional outlier year should be considered in the cumulative impacts analysis.
Council on Environmental Quality (CEQ) regulations state that cumulative impacts represent the “...impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions, regardless of what agency (Federal or non-Federal) or person undertakes such other actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over time.” The cumulative impacts assessment, which was prepared in accordance with CEQ regulations and FAA Order 1050.1E Change 1 and Order 5050.4B, is described in the Final EA in Chapter D, Environmental Consequences starting on page D.40. The cumulative impacts section in the Final EA describes past, present, and reasonably foreseeable projects on and adjacent to the Airport that have the potential for cumulative impacts when considered with the proposed actions. The analysis in the Final EA has been refined to address the comments received, and states that based on Federal significance thresholds, there would be no significant cumulative impacts.

In regard to the future timeframe for the assessment of impacts (2016), as stated above, CEQ regulations state that future actions being considered for cumulative impact analysis must be “reasonably foreseeable.” As mentioned in General Response 3-5, the aviation activity forecasts and analysis years from the Draft EA were updated prior to the publication of the Final EA. In the Final EA, 2008 remains the base year or existing year while 2013 was considered the initial year of commercial airline service and 2018 was considered the future year for applicable environmental consequence analysis.

Passenger service growth rates beyond 2018 (if any) cannot be accurately predicted at this time and are therefore not reasonably foreseeable. Accordingly, projects beyond 2018 are not appropriate for consideration in the cumulative impacts analysis. Also see General Response 3-5 for additional discussion on the selection of 2018 as the future year of analysis for the proposed actions.

11-9 How does this project compare to the commercial operations at Bellingham Airport?

Some comments suggested that the initiation of commercial service at Bellingham Airport was a good parallel example of what they envision occurring at Paine Field.

In response to comments about the potential parallel between commercial service at Bellingham Airport and Paine Field, consideration was given to the characteristics of the two airports. Because of the proximity of Bellingham Airport to the City of Bellingham and Vancouver British Columbia as well as the distance from Sea-Tac Airport, Bellingham Airport serves a much broader and larger market than would be served by Paine Field. The lower cost and relative convenience for British Columbia residents clearing customs at the border instead of at Vancouver International Airport is also a factor in the popularity of flying to U.S. destinations from Bellingham Airport.

If commercial service is initiated at Paine Field, the airlines will be serving a completely different market. Given the existing service at both Sea-Tac and Bellingham airports, the service
at Paine Field would likely draw traffic from primarily Snohomish County and those closest to the airport. Growth in traffic beyond that predicted by the carriers proposing the service is not reasonably foreseeable. See General Response 3-5.

11-10 Water quality impacts

Some comments related to the potential for water quality impacts as a result of the Proposed Action.

Water quality considerations related to airport development and operation often include increased surface runoff, erosion, and pollution from fuel, oil, solvents and deicing fluids and potential impacts from decreased water quality on fish, wildlife, plants, and humans. Potential pollution could come from petroleum products spilled on the surface and carried through drainage channels off of the Airport. State and Federal laws and regulations have been established that include standards for above ground and underground storage tanks, leak detection and overflow protection.

Paine Field currently operates under a Master Drainage Plan which includes stormwater detention and water quality requirements. According to the Master Drainage Plan, all runoff from the Airport is detained for stream protection standards as set forth in the 1992 Department of Ecology (DOE) Manual and the Snohomish County Addendum to that manual. The Airport also operates under Permit #SO3000428C issued to Snohomish County under the State of Washington’s Industrial Stormwater General Permit.

Only a small amount of additional impervious area (approximately 1,000 square feet) is anticipated as a result of the Proposed Action, as described in the water quality section starting on page D.37 of the Final EA. Commercial aircraft maintenance and washing activities are not expected as a result of the Proposed Action. All commercial aircraft requiring deicing would use the approved deicing pad located at Taxiway “A1”. This deicing pad drains to the Boeing Company sanitary sewer system and outfalls to the City of Everett Treatment Plant, not to groundwater or other bodies of water. The de-icing run-off would be treated at the treatment plant. The closest known aquifer is located approximately 220-feet below the Airport and infiltration or other impacts to this aquifer are considered unlikely. Therefore, there are no expected water quality impacts resulting from the Proposed Action.

Concerns were raised over the dumping of aircraft fuel before landing and its potential to impact water quality. Dumping of fuel is a rare practice that generally only occurs during emergency situations. Aircraft at lower altitudes often show a “trail,” that some people assume is a fuel dump. However, these vapor trails (contrails) are created due to moisture in the air and are not evidence of fuel dumping. Therefore, there are no expected water quality impacts related to the rare practice of fuel dumping.

11-11 Light pollution

Some comments stated that the project could increase light pollution.
According to the FAA Order 1050.1E, Change 1, Environmental Impacts: Policies and Procedures, due to relatively low levels of light intensity from airport lighting compared to background levels associated with airport development actions, light emissions impacts are unlikely to have an adverse impact on human activity or the use or characteristics of the protected properties. The metric for measuring impacts is generally a comparison between existing background lighting/visual impacts compared with the change proposed from the project. The Proposed Action includes only minor lighting improvements associated with the modular terminal expansion as well as minor lighting improvements for the commercial aircraft parking apron. No additional runway lighting would be required. Generally, airfield lighting is the most visual aspect of an airport. Because the additional terminal lighting meets with the general background lighting environment within the developed area, and because the existing Boeing aircraft parking ramp includes lighting, the minor lighting improvements associated with the terminal are not expected to result in a significant impact.

11-12 Wetlands

Some comments questioned impacts on wetlands.

As stated in the EA on page D.38, according to the Airport’s Master Drainage Plan, there are two large wetland areas, one wetland mitigation bank and a number of small wetlands located on airport property. Wetlands on Snohomish County Airport/Paine Field property have been impacted by fill, clearing and/or surrounding land use over the past several years. However, no wetlands were identified that could be potentially impacted by the proposed project.

Additionally, as stated in General Response 11-10, no significant water quality impacts are expected. Because increased stormwater and deicing practices would not exceed the capacity of the stormwater detention systems and permits, no water quality impacts are expected and therefore, no indirect wetland impacts are expected.