Appendix R
Hearing Three Commenter List

Please note: Commenters are listed in the order in which they spoke.

<table>
<thead>
<tr>
<th>Last Name</th>
<th>First Name</th>
<th>Transcript Page Number</th>
</tr>
</thead>
<tbody>
<tr>
<td>Harris</td>
<td>Daniel</td>
<td>27</td>
</tr>
<tr>
<td>Bandaragoda</td>
<td>Christina</td>
<td>28</td>
</tr>
<tr>
<td>Wagner</td>
<td>William</td>
<td>31</td>
</tr>
<tr>
<td>Henderson</td>
<td>Mr.</td>
<td>32</td>
</tr>
<tr>
<td>Moore</td>
<td>Mike</td>
<td>33</td>
</tr>
<tr>
<td>Hauth</td>
<td>Greg</td>
<td>36</td>
</tr>
<tr>
<td>Langus</td>
<td>Jim</td>
<td>38</td>
</tr>
<tr>
<td>Nichols</td>
<td>Frank</td>
<td>41</td>
</tr>
<tr>
<td>Wrightman</td>
<td>John</td>
<td>42</td>
</tr>
<tr>
<td>Reese</td>
<td>Cathy</td>
<td>44</td>
</tr>
<tr>
<td>Quinby</td>
<td>Harold</td>
<td>46</td>
</tr>
<tr>
<td>Doran</td>
<td>Don</td>
<td>48</td>
</tr>
<tr>
<td>Spampanti</td>
<td>Pamela</td>
<td>51</td>
</tr>
<tr>
<td>Emery</td>
<td>Richard</td>
<td>54</td>
</tr>
<tr>
<td>Hikel</td>
<td>Ted</td>
<td>56</td>
</tr>
<tr>
<td>Locke</td>
<td>Jackie</td>
<td>59</td>
</tr>
<tr>
<td>Eastman</td>
<td>Roy</td>
<td>61</td>
</tr>
<tr>
<td>Holland</td>
<td>Margaret</td>
<td>63</td>
</tr>
<tr>
<td>Haakenson</td>
<td>Gary</td>
<td>65</td>
</tr>
<tr>
<td>Marine</td>
<td>Joe</td>
<td>66</td>
</tr>
<tr>
<td>Lord</td>
<td>Randy</td>
<td>70</td>
</tr>
<tr>
<td>Pak</td>
<td>Hyon</td>
<td>72</td>
</tr>
<tr>
<td>Davis</td>
<td>Kelly</td>
<td>74</td>
</tr>
<tr>
<td>Vanderwielen</td>
<td>Ms.</td>
<td>75</td>
</tr>
<tr>
<td>An Unidentified Man</td>
<td></td>
<td>78</td>
</tr>
<tr>
<td>Abbey</td>
<td>Greg</td>
<td>80</td>
</tr>
<tr>
<td>Name</td>
<td>Last Name</td>
<td>Phone</td>
</tr>
<tr>
<td>--------------</td>
<td>-----------</td>
<td>-------</td>
</tr>
<tr>
<td>Shurtleff</td>
<td>Mark</td>
<td>82</td>
</tr>
<tr>
<td>Suhara</td>
<td>Mike</td>
<td>84</td>
</tr>
<tr>
<td>Casselman</td>
<td>Scott</td>
<td>86</td>
</tr>
<tr>
<td>Coupez</td>
<td>Victor</td>
<td>89</td>
</tr>
<tr>
<td>Emerson</td>
<td>Dave</td>
<td>90</td>
</tr>
<tr>
<td>Nelson</td>
<td>Harish</td>
<td>93</td>
</tr>
<tr>
<td>Gregerson</td>
<td>Jennifer</td>
<td>95</td>
</tr>
<tr>
<td>Fussell</td>
<td>Mark</td>
<td>96</td>
</tr>
<tr>
<td>Jenness</td>
<td>Bill</td>
<td>98</td>
</tr>
<tr>
<td>Boyer</td>
<td>Ray</td>
<td>101</td>
</tr>
<tr>
<td>Gregerson</td>
<td>Bill</td>
<td>104</td>
</tr>
<tr>
<td>Saul</td>
<td>Donald</td>
<td>105</td>
</tr>
<tr>
<td>Dangel</td>
<td>Laura</td>
<td>107</td>
</tr>
<tr>
<td>Adamson</td>
<td>Tim</td>
<td>108</td>
</tr>
<tr>
<td>Lee</td>
<td>Brainard</td>
<td>111</td>
</tr>
<tr>
<td>Page</td>
<td>Wanda</td>
<td>113</td>
</tr>
<tr>
<td>McKinley</td>
<td>Carlin</td>
<td>115</td>
</tr>
<tr>
<td>Hine</td>
<td>Ron</td>
<td>116</td>
</tr>
<tr>
<td>Luczyk</td>
<td>Paul</td>
<td>119</td>
</tr>
<tr>
<td>Robles</td>
<td>Michelle</td>
<td>122</td>
</tr>
<tr>
<td>Boaz</td>
<td>Melody</td>
<td>125</td>
</tr>
<tr>
<td>Hudec</td>
<td>Alice</td>
<td>127</td>
</tr>
<tr>
<td>Tisdel</td>
<td>Greg</td>
<td>129</td>
</tr>
<tr>
<td>Callfas</td>
<td>Victoria</td>
<td>131</td>
</tr>
<tr>
<td>Kronewitter</td>
<td>James</td>
<td>133</td>
</tr>
<tr>
<td>Salsman</td>
<td>Dave</td>
<td>135</td>
</tr>
<tr>
<td>Jin</td>
<td>Wei</td>
<td>137</td>
</tr>
<tr>
<td>Buchalter</td>
<td>Charlie</td>
<td>139</td>
</tr>
<tr>
<td>West</td>
<td>Loren</td>
<td>140</td>
</tr>
<tr>
<td>Gough</td>
<td>Don</td>
<td>142</td>
</tr>
<tr>
<td>Sullivan</td>
<td>John</td>
<td>145</td>
</tr>
<tr>
<td>Mallouk</td>
<td>Bechara</td>
<td>147</td>
</tr>
<tr>
<td>Destro</td>
<td>Chris</td>
<td>149</td>
</tr>
<tr>
<td>Smith</td>
<td>Robert</td>
<td>152</td>
</tr>
</tbody>
</table>

Responses to the hearing comments are listed following the hearing transcript.
Steve Demmert

Thank you for your comments. Please see general responses: 4-4 (Relationship between capacity at other airports and Paine Field), 7-1 (Use of DNL), 7-5 (Proposed commercial fleet mix), and 8-2 (Why weren’t diverted trips accounted for?).

Doug Tingwall

Thank you for your comments. Please see general responses: 1-9 (Roles of the Airport/Consultant and their Qualifications), 3-5 (Why was 2016 selected as the future year?), 6-3 (What are the project benefits?), 7-4 (Flight tracks should be shown), and 9-3 (Socioeconomic impacts). Also, please see the following individual response to comments.

Cultural Resources

In response to comments regarding cultural resources, cultural resources are discussed in the Environmental Assessment (EA) starting on page D.15. This resource category relates to historical, architectural, archaeological, and cultural resources of importance within the Area of Potential Effect (APE) that might be impacted by the Preferred Alternative. Because the APE is located on entirely pre-disturbed land, and there are no historic or cultural sites within the APE, the Federal Aviation Administration (FAA) has made a determination of “no effect.” Additionally, the FAA has coordinated with local tribes including the Stillquaamish Reservation, Sauk-Suiattle Indian Reservation and the Tulalip Tribe and no significant concerns were raised.

The FAA provided additional information to the Washington Department of Archeology & Historic Preservation in response the agency’s September 16, 2009 letter. After reviewing the additional information the Department of Archaeology & Historic Preservation concurred with the determination of no effect. This correspondence can be found in Appendix J of the EA.

Cultural Survey Not Conducted

In response to comments regarding the need for a cultural survey, cultural resource surveys are typically conducted when there is a reasonable expectation that the proposed action may affect cultural or historic resources or when the project area consists of undisturbed lands. The Area of Potential Effect (APE) for the Preferred Alternative consists entirely of pre-disturbed ground. A determination of “no effect” was made by Federal Aviation Administration (FAA) and concurred by the Washington Department of Archaeology & Historic Preservation (see Appendix J).

Michael Wilhelm

Thank you for your comments. Please see general response: 3-5 (Why was 2016 selected as the future year?).
**Chuck Rhoden**

Thank you for your comments.

**Jagdish Sharma**

Thank you for your comments. Please see general responses: 1-10 (Scope of the EA analysis for future operations and passengers), 1-13 (Additional study should be conducted), 3-5 (Why was 2016 selected as the future year?), 3-14 (What actions will require additional environmental review?), 6-5 (What are the quality of life impacts), 7-4 (Flight tracks should be shown), 9-3 (Socioeconomic impacts), and 10-1 (Greenhouse gas/climate change).

**Ted Hikel**

Thank you for your comments. Please see general responses: 1-5 (Mitigation), 1-10 (Scope of the EA analysis for future operations and passengers), 1-13 (Additional study should be conducted), 2-1 (MRD document), 3-5 (Why was 2016 selected as the future year?), 3-14 (What actions will require additional environmental review?), 4-1 (Alternative airports should be used), 5-1 (Existing aircraft noise concerns), 6-1 (Significance of Project Effects), 9-1 (What is the impact upon property values?), and 9-3 (Socioeconomic impacts).

**Dave Emerson**

Thank you for your comments. Please see general responses: 2-1 (MRD document), 9-1 (What is the impact upon property values?), and 9-3 (Socioeconomic impacts).

**Mark Hurston**

Thank you for your comments. Please see general responses: 1-11 (Flawed/inadequate/biased EA), 1-13 (Additional study should be conducted), 7-9 (What are the health effects of noise?), 7-10 (What potential existing for a project related increase in vibrations?), and 9-1 (What is the impact upon property values?).

**Kevin Snively**

Thank you for your comments. Please see general responses: 1-1 (Why can’t the County limit or restrict operations?), 8-1 (Traffic analysis), 10-2 (Air quality conformity) 11-1 (What is the impact on wildlife?), and 11-10 (Water quality impacts).
PUBLIC HEARING RE:
NATIONAL ENVIRONMENTAL POLICY ACT
DRAFT ENVIRONMENTAL ASSESSMENT OF PROPOSED COMMERCIAL AIR SERVICE AT PAINE FIELD

JANUARY 21, 2010
KAMI AK HIGH SCHOOL, MUKILTEO, WASHINGTON

REPORTED BY:
SHARON L. WESTLING, REGISTERED PROFESSIONAL REPORTER
No. 2301
January 21, 2010

MR. MARINE: I'm Bill Marine your mayor of Mukilteo. Thank you all for coming out this evening.

I just want to go over a few housekeeping things. If you have a seat next to you that's available, maybe move your coat, raise your hand. We want to get as many people seated as possible.

So those of you along the side, we still have people out in the lobby, we've asked them to -- that's good, we've asked them to -- they're trying. And the reason we're waiting a couple minutes is trying to pipe sound out there. So even if you can't get in, they can hear what's going on.

We're asking those who may not be able to stay but want to comment to at least write their name down, take a comment sheet. You don't have to speak publicly, you can do it in writing. So there's other ways to make sure your voice is heard on this issue.

But we do appreciate all you coming out and your passion and your ideas and your concerns behind this.

I would also ask that we all be very respectful this evening. There's clearly at least two pretty
divided sides of this issue. And everybody has rights. We ask that you be respectful. We don't want anybody to feel they're concerned, or too intimidated to be able to speak.

I've been to the meeting in Everett. When there were people supporting of the airport, they did not boo when somebody got up there that was against it. I'm assuming, from the majority of people here, and the fact we're in Mukilteo, that the majority of the people are probably against the airport. But I would ask when people are speaking, please do not applaud. They might be saying something that sounds good, but please don't applaud. Don't boo or hiss if they're saying something you don't like. And also, keeps us moving along.

Everybody is going to get three minutes. The last I saw there were 60 cards out, and I know there's probably well over that now. Anybody know that? Anyway, there's a lot. And you start doing three minutes per, you can kind of get an idea.

So also on that note, after you've spoken, feel free, unless you just want to stay and listen to everybody's comments, feel free to leave. You're on the record, and it will open up a seat for somebody else as well. So don't feel that you have to stay
for the whole thing even though you'd rather go home. So feel free once you've spoken, if you would like to open up a seat.

A MAN IN THE AUDIENCE: Sounds from what you're saying, Joe, as though there are so many speakers that it's going to become a problem to be able to speak three minutes, and going through, my number is 74. I would like to speak, but that would take quite a bit of time. Is there a prospect to extend the meetings for another day?

MR. MARINE: I have nothing to do with that. I'm not with the County or the FAA. I'm just here.

A MAN IN THE AUDIENCE: Can you take that question to your people?

MR. MARINE: They heard that. What they have done in the previous meetings as well is you may have your number come up and you just say, everybody said what I was going to say, and you don't need to speak. We've had probably about 20 people that said, I'm good, and they moved on to the next number. So they go quicker that way as well.

Beyond that, people may have questions, if it's on the process, I'm not going to answer any of those. We will let others that can talk on that do that.
But, again, thank you for coming. Please be respectful. And if there's a seat next to you, try to open that up for a neighbor.

This is Millie Judge, who's going to be our moderator this meaning. Millie. Give her a welcome.

MS. JUDGE: I'm Millie Judge. I'm an attorney in town, and I've been asked to moderate our hearing tonight.

We've got tons of people who want to speak, so I'm going to keep my remarks right now really short. I'm going to come back and talk ground rules and process after Ryk has done a short presentation.

We're here tonight to hear your comments on the Draft Environmental Assessment. This document. And its attachments. And the focus tonight is whether it's adequate. So if you can really focus your comments on the adequacy of the documents in particular. The more specific, the better that will help us.

Ryk tonight is going to be explaining what's in that document. To the extent you haven't had a chance to read it, he's going to summarize what's in it so your comments can cue on things.

So without any further delay, Ryk's presentation
is about 20 minutes. So we'll quickly go through it, and then we're going to get right into your comments.

At 8:00-ish we're going to take a break. We have a court reporter here, and she's typing down every word that's being said. So at some point her hands are going to cramp up, and we're going to need to give her a couple minutes to rest.

Please do feel free to go home once you've said your piece and you've heard enough. As you're going, you might whisper to the people in the hall, there's a seat down here. Because we're going to try to get as many people in here to participate as possible.

Last but not least, I'm going to probably stress this a couple times. Forgive me if I get grumpy with folks who don't respect Mr. Marine's request to please hold your applause or outbursts. We really need to keep this moving if everybody is going to be heard. And that's why we're here.

So, Ryk Dunkelberg.

MR. DUNKELBERG: Thank you. Before I start, I just want to reiterate a couple things. There's some comments or concerns I guess about sign-in sheets and why we had to sign in. What we want to
Do is keep an accurate -- as accurate a record as we can of the interest shown by the community in this project. And the only way to officially do that is to have names on a sign-in sheet so when this document is reviewed by the Federal Aviation Administration, they can see how many people are interested and come to different meetings.

So if you haven't signed in, please do, because it really shows how many people were interested in what we said here.

The other thing I wanted to reiterate is we're going to take verbal comments tonight. And if you have a card, it will have a number, and you put your name on the back of it, and we'll give that to the court reporter, because she's going to use those cards to make sure she gets your name spelled as correctly as she can, and make sure it's correct. We want to get everybody's comments in the record, and that's the best way to do that.

In addition, if you don't want to speak tonight, or if you feel you have some other things to say, we're taking comments both written and electronically. As we go through the presentation, I'll give the address to send written comments to and the e-mail address to send electronic copies to.
So just keep that in mind.

And also outside on boards out there there are those same addresses you can use.

Okay. What we want to talk about tonight is the Environmental Assessment that's prepared that you all, we hope, have some time to review. We're going to go through tonight. We're going to give a little bit of background on the project.

Then we're going to talk about the major chapters of the Environmental Assessment. And those major chapters are the purpose and need, and alternatives, and the effect on the environment. And what people are most interested in are the environmental consequences, what are the effects of the proposed projects on the community. Then we'll take public comments and talk a little bit about the next step.

The purpose of the hearing is what our hearing examiner talked about, and that is to explain the project and receive public comments on the Environmental Assessment. And, as I said, those comments can be verbal tonight, they can written, or they can be electronic. And all comments have the same weight. Verbal comments don't hold any more weight than written comments.
The purpose and need for the proposed actions.

The purpose of the federal action is to evaluate requests from both Horizon Air and Allegiant Air for the FAA to amend the operations specifications, in other words, how those aircraft operate, those airlines operate, to allow scheduled commercial service at the airport. And approval of an amendment to the airport's operating certificate, all under CFR part 139.

The need for the addition of a modular terminal building is to accommodate the proposed scheduled passenger service. Existing facilities do not accommodate that.

The need is established in federal statutes and regulations that direct the FAA to respond to the requests of the airlines. The airlines have submitted requests to the FAA to operate commercial scheduled service at Paine Field. There is limited discretion in approving the amendments to those airlines' operations specifications, or the airport's operating certificate if all conditions are met. If the aircraft are certified to operate in the United States, the aircraft are safe, if the airport can accommodate those aircraft, things of that nature.
In order to efficiently and safely serve the carriers and passengers, the existing passenger processing space must be expanded.

What exactly have the airlines requested the FAA to do? There's two different airlines that have requested to operate at the airport. One is Horizon Air and the other is Allegiant Air. Horizon Air proposes to use the Q400 aircraft, that is a turboprop aircraft that they are operating today, to initiate service with six departures per day increasing to ten per day in 2016. Six departures equals 12 operations. An operation is either a landing or a takeoff. So when we say six departures, 12 operations. Ten departures, 20 operations. Those are per day. This represents approximately 4,380 operations per year initially, growing to 7,300 operations in 2016.

They have also stated that the CRJ 700 aircraft, that's a Canadian Regional Jet, would be an aircraft that would be used as a backup in case the Q400 aircraft were not available.

Allegiant Air. They are proposing to use the MD-83 aircraft, which is a jet aircraft, to initiate service with two departures per week increasing to ten departures per week. This represents 208
operations growing to just over 1,000 operations in 2016.

Total operations and enplanements. An additional 4,588 operations growing to 8,340 operations over and above the other aircraft operations that operate at Paine Field. And this would result in approximately 112,000 enplanements initially, growing to 238,000 enplanements in 2016.

An enplanement is somebody that gets on an aircraft here. A passenger is counted as people who get off an airplane and get on an airplane. So an enplanement is somebody that gets on an airplane here.

This table shows forecasts of aircraft operations without the project. In other words, what would happen in the future without the project. And this shows approximately, 2008, there were 143,000 annual operations of these different types of aircraft.

In 2016 that would grow to approximately 162,000 annual operations of these types of aircraft.

This table shows what the operation would be by aircraft type in the future if the airlines and aircraft utilize this airport.

This column shows the number of operations by
aircraft type that would occur without the project compared to those operations and enplanements that would occur in the future with the project.

So you can compare without the project in the future, with the project. So about 5,000 more operations, as we said earlier, between the no project and the project in 2010.

And there's about 8,000 operation difference between the action and the action in the year 2016.

What alternatives did we consider? The National Environmental Policy Act states that you need to look at the no action, the do nothing alternative, as well as the proposed project. So we evaluated the no action alternative.

The preferred alternative is the alternative that's being evaluated in the EA, which is the proposed project. We looked at those actions. We looked at the use of other airports. The use of other aircraft.

And we looked at the need to construct a large permanent terminal as shown on the existing airport layout plan.

One of the first statutes in preparing an environmental document is to look at what we call existing conditions. That's the affected
environment around the airport. There are about 21, 22 resource categories we evaluated. And here's a list of those categories that are evaluated that you compare the project against. What would be impacted to these resource categories if the project was initiated.

Again, this is the most important chapter, this is what everybody is interested in. The consequences, the affects of the project.

And remember, what we are comparing by federal statute and federal orders is, are there any federally defined thresholds of significance that are exceeded. That's the threshold question. That's the question. It's not the question, is there any affect to the community or any of the natural resources if the project is proposed. But the question is, are any thresholds of significance exceeded. And we'll go through those thresholds of significance which then tell you whether you have a significant impact or not.

One of the most important ones is air quality. We evaluate the project on air quality, both surface transportation air quality, how many additional automobiles will be associated with those passengers getting on aircraft here, and the air quality
associated with aircraft and ground service vehicles that service those aircraft.

This particular table summarizes the air emissions listed over here in this column with the no action; the preferred alternative; and then the actual level of these emissions that are a result of the proposed project.

And so we see that there are increases in air quality emissions on the proposed project, because of the proposed project, just as you would surmise.

In addition to aircraft operations, in addition to the surface transportation operations, we would have short term construction emissions, emissions with the construction of the terminal. And these are the emissions in tons per year which would be emitted due to construction activity. Construction activity takes place in about 90 days. So these emissions have to be added to the operational emissions.

This particular table shows operational emissions in tons by aircraft, by ground support vehicles, tugs and things like that that operate the baggage, surface travel, vehicle miles traveled, surface vehicles, cars, and then the total emissions by each emission category per year. It shows the
breakdown of those emissions for each one of those years.

One of the thresholds that we look at is would certain number of CO, tons per year, would they exceed what's called the de-minimis level. And the de-minimis level is one hundred tons per year of that particular emission. And if you look at the project-related emissions, they all are below the one hundred. Here are the project related emissions in tons of CO for year 2010 and year 2016. And they're all below one hundred ton threshold.

All those 21 categories I showed you, and we evaluated the proposed project against each one of those categories. And the next one we look at is the coastal zone resource. County Planning and Development Services indicated that development on the airport is not subject to the requirements of a shoreline substantial development permit.

However, the Washington Department of Ecology has requested that upon completion of an EA and an environmental determination by a federal government, a certification of consistency with the State Coastal Zone Management Program must be applied for. So that's a program that must be applied for.

Other factors we looked at. Compatible land
use. We looked at what's called the airport influence area, the area around the airport for existing and zoned land uses.

We looked at existing zoning, and that existing zoning is generally compatible with aircraft operations. Now this particular category is tied directly to land use. Compatible land use and noise. Aircraft noise, compatible land use. And those two are explicitly tied. When we get into the noise determination, we will then talk about thresholds of significance to determine whether we have compatible land use or not compatible land use around the airport.

Construction impacts. We looked at short term construction impacts and the best management practices that are now adopted to aid us in construction.

Department of Transportation Section 4(f). Generally with that means is there are certain properties defined by the Department of Transportation Act which have special significance. Those properties are parks, recreation facilities, historical sites, those type of properties which really have a lot of cultural, historical significance, or recreation value to the community.
And we have to look at those particular properties to see if they are, number one, either actually impacted, in other words, would a project want to take property now and use one of those facilities and convert to some other use, or are they impacted by excessive aircraft noise levels. So we looked at those particular properties. And there's no significant impact to any of those properties within the area of the airport.

We looked at fish, wildlife, and plants, endangered species, threatened species, critical habitats. And the project area does not include any critical habitat or threatened or endangered species. So no bugs, bunnies, or birds that are threatened.

Floodplains. No stated impact to floodplains. Going to be very little additional impervious surface. Okay.

This category, historical, architectural, archeological and cultural resources. Very close to the section, but these deal just with those cultural and historical sites. And there has to be coordination with the state historic preservation officer and the tribes that have cultural or historical interest. And the FAA has consulted with
the state historic preservation officer. And the Department of Archaeology and Historic Preservation has concurred that there's no historic properties that will be affected by the proposed project. That coordination has taken place.

The FAA also consulted with the tribes, the Stillaguamish, Sauk-Suiattle, Tulalip Tribe, and we've received no comments from any of those tribes to date.

Light emissions and visual impacts. There will be none of those emissions.

Natural resources, energy supply, and sustainable design. There's no significant impact to any of those categories with the proposed project.

Noise. Noise is a very critical resource, very important one, one most of you have an interest in. Noise is presented for aircraft by what are called noise contours. And noise contours connect points of equal noise energy. They are just like topographic contours which connect points of equal elevation. And they are determined using a metric called DNL, and stands for day night noise level. The DNL is not what you hear. You hear single aircraft landing and taking off. The DNL noise
The DNL contour is an annual average cumulative noise level. And so it represents a year's worth of aircraft operations.

The DNL contour is generated using the aircraft numbers of operations, the type of aircraft that generate those operations, the time of day or night those operations occur - nighttime operations are more intrusive, they're more impactful than daytime operations - and it's generated by the flight track, where the aircraft flies.

These particular contours on this map represent the existing actual 2008 noise contours. The 65 DNL noise contour, which is represented by this largest line on here, is the federally defined threshold noise contour that determines land use incompatibility. And the threshold of significance will determine land use impacts.

And in 2008 there were no existing residential uses, no schools, no religious facilities within that noise contour.

We then have to compare the future, what would the future look like with and without the project. And again, 65 DNL is the threshold contour. And 65 DNL is represented by this outside line.

What's also represented on here, which you can
barely tell, is the 2010 contour without the project. They are so close together that there's hardly any difference at all in the type of contour, the size of contour.

A WOMAN IN THE AUDIENCE: Excuse me, sir. Can I ask a question?

MR. DUNKELBERG: No, ma'am.

This particular contour represents the 2016 noise contours associated with aircraft operations that are forecasted to occur that year. Again, you can see the outside contour is bigger than the 2010 contour, and it is the 65 DNL noise contour. And on the same map, the same year without the project. And there's very little difference. And these maps are shown in larger scale on the boards in the foyer.

So, again, in the year 2016, based on the federally defined thresholds of significance, there are no noise sensitive uses within that contour.

We then looked at secondary, or induced impacts. And we looked at impacts to certain significant or critical categories of people, those being socioeconomic environment, environmental justice issues, children's environmental health and safety risks. And there's no significant impact in either
of those categories at this time with the proposed project.

MS. JUDGE: Folks, I'm going to ask you to keep your comments. Please, let's let him finish, then we'll get to you.

MR. DUNKELBERG: The next really important issue is surface transportation. What will the proposed enplanements mean as far as automobiles on surface streets. Will it exceed any levels of significance as far as intersections and things of that nature are concerned? So we evaluated those types of impacts.

The analysis, the surface transportation analysis was done in coordination with Washington State Department of Transportation, Snohomish County, City of Everett and the City of Mukilteo.

Impacts analyzed for existing conditions, 2010/2011, opening year operations, with and without the project. And 2016 future conditions with and without the project. In other words, what's the difference in impact in the future.

The proposed actions will not cause any arterials or intersections to operate at a deficit level of service.

MS. JUDGE: If we want to have a hearing and let
everybody speak, then we're going to be respectful. If not, we're going to have to clear the room. That's the last time we're going to have an outburst. Got it, folks in the back? You can clear the room if we need to. Let's settle down. You will get a chance to speak.

MR. DUNKELBERG: There are traffic mitigation fees which have to be paid. And those are based on local requirements for new trips, but not a federally defined exceedance of significant thresholds.

Now this analysis assumes no reduction in vehicle trip diversions from either Sea-Tac or Bellingham for folks coming to Paine Field as opposed to driving to Sea-Tac. So that assumes all new trips and new passengers.

Water quality. Water quality looks at impervious surface. There will be an increase in impervious surface because of runoff, and also looks at wetlands. And there are no wetlands in the project area that would be affected.

And there will be small increases in the impervious surface. This map shows the existing airport administration offices and the proposed module terminal. Module terminal and half of the
connected breezeway is on existing tarmac; however, this part of the breezeway would be constructed over grass. So there would be some additional impervious surface.

Cumulative impacts. What are the cumulative impacts? What impacts would this project have on other reasonably foreseeable projects? Put together, would we see any thresholds of significance? And we looked at, including the surface transportation analysis and socioeconomic analysis, we looked at adjacent developments, including Mukilteo Town Center, the Center 44 Commercial Development, and the Metropolitan Commerce Center.

There are no past, present, or reasonably foreseeable projects that are expected to cumulatively add to aircraft generated noise to produce any significant impact. So from a surface transportation and noise standpoint, cumulatively they won't exceed the thresholds.

We had questions concerning what in the future would require additional environmental analysis. This slide depicts the fact that if the operations specifications amendment request by another airline to begin service at Paine Field, that would require
environmental determination. So if another airline came in, that would require environmental determination.

Introduction of a new aircraft type. If the two airlines operations specifications are approved, if they wanted to change aircraft types, that would require another environmental determination.

Any additional city destinations not currently covered by the operations destinations from the two airlines would require additional determination.

And any FAA funding for either a new or expanded terminal building. These items would require federal NEPA, National Environmental Policy Act, environmental determination.

However, even if this particular Environmental Assessment is approved at the federal level, it still has to go through SEPA, which is the local Environmental Policy Act requirements. So there's another environmental document and another environmental determination required even after if the NEPA is approved.

These are the addresses for written comments. Dave Waggoner, his address. Kayla Morgan is the FAA representative, it's her address. Or you can send e-mail comments to this address, or Kayla's address
here.

Again, they're also on the board out front, and they're also on the comment sheets.

The official comment period of the draft EA runs through February 5, 2010. So you have a couple weeks after tonight to submit comments.

MS. JUDGE: We now have the beginning of our testimony period. It's now just a couple minutes before 7:00. I will quickly go through some ground rules.

Would everybody hold up a card that has one in their hand to speak? I've been told there's about 100 people signed up.

I would like the first five people, please come down to the very front seats right here. There's two seats at the front of each station. So 1, 2, 3 and 4 come down.

You are limited to three minutes. If you can get your comments made or have written submissions shorter than that, you don't have to use all three minutes.

My estimate, if things work like clockwork and we try to get through this as quickly as we can, we'll get to maybe 20 people an hour. So that's why I'm asking you, I know you've got your three
minutes, but if you can do it in less and make your point, do so. And if you need more, follow up in writing.

Can everybody please turn off your cell phones or put them on vibrate. And if you need to take a call, go all the way outside.

I really want you to focus your testimony and attention to me. I don't want you addressing it to the crowd. I'm the one here who's supposed to be taking your comments.

Sharon here is going to be doing her best to get it. I know we're asking you to hurry, but we also need you to speak as clearly as you can.

There are microphones, that are a little bit hard to see with the lighting, down here in front of the stage. We'll ask you when number 1 is speaking, I would like, number 2, if that's where you are, to be right there ready to go as soon as they're finished.

I'm going to ask you one more time, please, don't applaud between people. That takes away the time from the next person waiting to speak, and we will never get out of here before 2:00 in the morning if we can't.

I have spoken to the FAA about whether or not
it's possible to extend beyond tonight, and they told me it's not, because of the legal restrictions on time.

We are prepared to stay until we hear from everyone. So that's what I'm saying, again, let's move this quickly as we can.

If folks would come down.

So, yes, sir.

A MAN IN THE AUDIENCE: Who do you work for?

MS. JUDGE: My name is Millie Judge, I'm a private attorney, and I've been asked to come and participate tonight and moderate the hearing. I'm not on either side.

All right.

Number 1. Please state your name and spell your last name, and your card.

We're going to ask you to give your card to Ryan so he can get it to Sharon.

Sir.

MR. HARRIS: Daniel Harris, a 20-year resident of the area. I live in the flight path. I appreciate the opportunity to speak, and I appreciate the open process in reviewing this important project.

A lot of time and energy has gone into the
development of this environmental study. And while it's comprehensive in nature, it really fails to adequately address the noise impact on our schools and community. Our schools and community will be deeply affected as the traffic increases, both in numbers and the type of aircraft.

It's not clear who's going to pay for the cost of noise mitigation. Where is the money going to be coming from?

I would like to call everyone's attention to the 2008 technical report, annual technical report from Seattle Tacoma Airport. And it's available online at www.portofseattle.gov. And one of the things which it addresses on page 14 is as of the end of 2008, $347 million has been spent to mitigate costs of noise at Seattle in the area of the Sea-Tac Airport.

Through the addition of more flights will increase the noise. And I think as part of the environmental impact statement, we should consider where that money is going to come from. Thank you.

MS. JUDGE: Number 2.

MS. BANDARAGODA: Dr. Christina Bandaragoda, BANDARAGODA.

I'm a Ph.D in environmental engineering. It's
my professional opinion that the Environmental Assessment is limited in scope, and liberal in the assumptions used to estimate increased pollution using the EDMS model and (unintelligible words). There are no (unintelligible word) analysis, or sensitivity analysis. Which, if done as expected in any professional and scientific application in any model, many of the air pollution levels expected after expansion would exceed de-minimis level federally mandated by the clean air act.

The fact the Environmental Assessment does not even use the latest freely available version of EDMS, the model used to simulate future conditions is 5.151 and 5.152, which both are available since the study began.

Whether one supports the availability of more convenient air transport, it cannot be disputed that we all deserve the best available science practices to understand and determine the long-term costs of the decision to make the airport commercial.

Two months ago in November, 2009 a University of California study showed that the pollution affects at smaller and regional airports are much higher than have been previously estimated. Of particular concern are small particulate referred to as PM 2.5,
or PM 10. They found that they are ten times higher within one football field, and 2.5 times higher within six football field lengths of small regional airport.

The Puget Sound Clean Air Agency in its 2008 air quality data summary that monitors sites in Snohomish County found that they are close to the daily fine particle federal standard, and exceed daily fine particulate set at 24 hour average. It was intended to never been exceeded.

The Environmental Assessment did not incorporate or reference any of our local studies for data collection. There’s no scientific information that supports the assertion that the expansion of the airport will have no affect.

The EA, contrary, appears that to approve the expansion, and local and federal officials will have to overlook what we already know.

This morning I was playing at Paine Field Community Park, which was just dedicated three months ago, and adjacent to Paine Field. How can it be that we in the community are simultaneously providing outdoor recreation for our children, while agreeing to increased air pollution at any level?

I have to believe that any support of airport
expansion is due to lack of information and education. Thank you.

MS. JUDGE: Number three.

Please, hold your applause. Folks. Please. Please.

Number three.

MR. WAGNER: William Wagner, WAGNER. I hadn't actually been able to have time to read the Environmental Impact, but I've gone over and listened to what was proposed. I do have some background in this. I'm a previous Boeing employee. I have worked near Sea-Tac Airport for Boeing, and other organizations, so I know what it's like for that.

But something I don't think anybody, and I haven't read, anyway, is the impact of what happens if Boeing does leave. Because this airport was here before. It's not a new airport, it's an existing airport. And if Boeing leaves, where are we going to have jobs?

I don't want to have to go to Seattle to fly on a plane. I don't like having to drive past Everett. I live in Mount Vernon. I like to fly, but I also have to balance my life and the needs of the community and my state with jobs and the situation
I don't see this as being a major impact to the degree that people think it is, because Boeing is leaving. That's a given. They're going away, just like my job at Boeing went.


MR. HENDERSON: Henderson, HENDERSON. I live south of the airport. Our prevailing winds generally come from the south in this area. So that pretty much makes it so that I would be -- airplanes, most airplanes would be flying my direction as they take off.

I believe it appears as though this -- I mean, we can see by reading the charts that conclusions have been drawn. Looks like this is going to happen, regardless. And I think that what we should do is focus on the conditions that would make this more palatable. And that is how other airports around the country and world have addressed this issue.

One way is curfews. Flights are not allowed during the overnight hours.

Another way is strict measurable noise limits. There are airports in the country and around the world that have placed microphones out in the
community, and when airlines exceed noise limits, they pay a fine.

They know who takes off, when, they measure it. If they exceed, they pay a fine.

I also would like to see strict noise abatement procedures put in place for this. That's typically done. An example is Orange County Airport in Southern California. The airplanes get as high as they can while they're over the airport perimeter, and then they level off and just idle until they get out over the ocean about a mile out there, and then they resume their climb. I think these sorts of things would make this more palatable.

One last thing. I was born in Seattle. So if anybody has a right to complain about growth, it's me. But my parents came here because of growth, and we -- this area is going to grow. It's just a matter of whether we do it smart or not.

MS. JUDGE: Thank you. Number 5.

Six, 7, 8, 9, please come on down.

MR. MOORE: Mike Moore, M O O R E. I have a number of issues regarding the Environmental Assessment, and even greater concerns about the process.

Single mind focus of the FAA is to get airlines
into Paine Field establishing a disturbing record and pattern. Here are some examples.

In November, 2005 the FAA stated, and I quote, We do not force an airport to change its role from general aviation. Unquote.

But then the FAA threatened, deferred, and suspended FAA funds unless the county did just that. How do we know? Four words: Freedom of information act.

Here's a quote from a conversation between a county EDC member and the FAA in February 2009. Quote: FAA manager of Seattle district office confirmed that the FAA had indeed suspended discretionary grants, and that until there's a deal struck with Horizon for lease of an adequate terminal, those dollars and any stimulus dollars will not be issued. Unquote.

That is not what the FAA told Congressman Inslee, however.

Here's another example. November, 2005. The FAA stated: The airport is not required to construct or upgrade facilities. Unquote.

February, 2009 they said, there will only be funding of an Environmental Assessment if the county agrees to build a terminal.
Again, in November, 2005 the FAA was asked: Can an airport operator charge interested air carriers for all direct and indirect costs?

The FAA's answer was, quote: Generally, yes.

But the FAA in April, 2009, countered that statement. Quote: If the county is building a terminal, then it is not fair to charge an airline the construction costs.

Finally here's an example tied directly to the scope of EA. February -- November of 2005. Generally the airport may not impose restrictions on the type of aircraft, the frequency of flights, or the time of day of operations. Unquote.

But the EA does not. This EA does not assess unrestricted flight activity. Rather it is based on a small number of flights.

So my view, the EA is flawed, the scope is limited. It's designed to show no impacts and therefore no mitigation or indirect costs.

We have a right to be frustrated with a public process based on a predetermined outcome. A process FAA was even worried about. Internal communication in 2008, quote: We may have got a bit ahead of ourselves, and I have given the impression that we have made NEPA findings rather than evaluate the
potential environmental impacts. Unquote.

In January, 2009 they produced the Environmental Assessment timetable that concluded with the finding of no significant impact. This timetable is produced before the Environmental Assessment had even begun.

In conclusion, the FAA should stop threatening the county and undermining negotiations they're not party to. Airlines have not complained, so why should the FAA. The FAA should not distort the market by subsidizing airlines to get them started.

Instead, the FAA and airport officials should step up and be honest about assessing all the potential impacts of this federal action within this EA.

I close with a question. Are FAA and airport officials really listening tonight? Or are they just finishing their checklist?

MS. JUDGE: Folks, please hold your applause.

Number 6. You're up. And 7, if you can be ready. Eight, 9.

MR. HAUTH: Greg Hauth, Mukilteo, Washington. You mentioned there are several conditions under which a new EA might be issued. I'm asking that you do a new Environmental Assessment right now.
The EA is not about small initial conditions that are imposed by Horizon and Allegiant. The key thing is it's about changing the airport's operating certificate from a class four to a class one airport. When you go to a class one airport, under an FAA rules, there are no restrictions as to type of aircraft, number of flights, or time of day. Curfews and other compromise are not allowed. That means we have to consider the scope of the airport at full capacity at any time, day or night.

In addition, the EA is scoped out only to the year 2016. It should be scoped out for a full 20 years, which would take you out to the year 2030.

So what we have here is basically, if you put garbage in at the front end to an analysis, you get garbage out at the back end, which is basically --

MS. JUDGE: Folks. Please.

MR. HAUTH: If the FAA continues with pursuing a finding of no significant impact, it will really only confirm that this entire process and these hearings are a sham. FONSI means finding no significant impacts. It doesn't allow you to escape doing proper analysis, and it doesn't allow you to ignore the truth.

The FAA has been heavy-handed and coercive
throughout this process. It's showing a FONSI now will only confirm that the FAA process is without merit. We're asking for a new EA now.

MS. JUDGE: Number seven. Number seven.

MR. LANGUS: Jim Langus. The Environmental Assessment provided a comprehensive analysis regarding a number of issues.

MS. JUDGE: Mr. Langus, can you hold up. Can you folks hear him? Is there a sound man there? Can you check his mic, please?

MR. LANGUS: The Environmental Assessment provided a comprehensive analysis regarding a number of issues. I believe that the specific areas identified within the assessment included a broad scope of environmental issues. These issues came under significant scrutiny as a result of their potential relationship and impacts related to the proposal at Paine Field.

Based on the determinations in the EA, the FAA should concur with the finding that there are no significant impacts as a result of this proposal, and that the Environmental Assessment combined with NEPA for the actions proposed at Paine Field, and additionally, that no further study should be required.
There needs to be some common sense applied to this proposal. For years we've experienced many types of airplanes flying in and out of Paine Field, both commercial and general aviation. And today with the around 400 flights a day, we are only talking about a fraction of the air traffic that will be increased as a result of this proposal.

I understand the concern is the camel's nose. However, a utilization of only 45 percent, even with an increase in general aviation, including executive jet travel and repair maintenance facilities, passenger air service will always remain a minimal component of overall airport use.

And a lot of money is being spent on this debate, including considerable public dollars, when it is clear that the FAA stated they shall issue an air carrier operating certificate to a person desiring to be an air carrier if they are equipped to operate safely, and that Snohomish County has agreed to 39 grant assurances, while accepting grants from the FAA, and these assurances commit the county to certain requirements, including non-discrimination issues, and including allowing commercial air service operations to occur at the airport.
The actual text of the grant assurances found in the EA reads as follows, assurance 22, economic non-discrimination. It will 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.

The FAA reminded the county in a letter dated June 4, 2009 in an appendix to the EA that grant assurance 22, which requires -- which the county agreed to when it accepted FAA funds -- requires the county to make the airport available as an airport for public use on reasonable terms and without unjust discrimination to all types, including commercial aeronautical activities.

I trust, with the FAA's purpose and responsibilities in matters like this, and with federal law including, and now coupled with the completed Environmental Assessment, that wisdom will prevail and a finding of no further action will be determined.

Thank you for the opportunity to speak.

MS. JUDGE: Thank you, Mr. Langus.

Number 8.
MR. NICHOLS: Frank Nichols. I'm not affiliated with any groups, the Sierra Club, Green Peace, builders, airports, aviation, nothing.

My family moved here in 1955. I went to school at Fairmont when Paine Field was still an air force base, went to Olympic View Junior High School. I know Mr. Langus, in fact he was one of my high school teachers. Anyway, I'm offering these comments so you can gauge the veracity of what I'm going to give you as an exhibit.

I went to the war in Bosnia for the army, I just retired as lieutenant colonel. I'm a pilot, civilian pilot and military pilot, and I live right down over the hill here. I saved every dime I could to live here in Mukilteo, because I know the area. I've flown hundreds of hours in big CH 47's right here in Paine Field. This is where I got my first pilot's license.

But I took a picture -- I'm also an attorney licensed in Idaho. I took a picture of my back yard, 25 feet from my back door just about a little over a year ago. I wasn't sure what it was, but I listen to them every single night, so I checked on the internet. Turns out it's a Northern Spotted Owl. They live right behind my house.
MS. JUDGE: Folks, please.

MR. NICHOLS: Check, the sound track's available on the internet. And I captured that picture myself with my camera. It's on my computer at home. Told everybody about it when I heard about it. Told all the neighbors. And I checked today on the internet, and they are a threatened species still.

And, once again, I'm not affiliated with any environmental groups at all. I have no axe to grind in that arena. But I want you to know that they live right behind my house, that I would not like to see them go away at all.

MS. JUDGE: Thank you.

Hold on. Please save your applause. Now, come on, that's enough.

We would like to note for the record that testimony from our speaker Number 8, Mr. Nichols, there is an exhibit. And we've marked that for the record.

We have next number 9. Folks, please come down, number 10, 11, 12, 13 and sit in the front here so you're ready.

MR. WIGHTMAN: John Wightman, I'm from Mukilteo.

I just wanted to point out that the gentleman who gave the presentation clearly stated that if
there's no significant impacts found in the study, that there's limited discretion in approving this document. So sounds like to me that the FAA has already got the rubber stamp out and just waiting for this meeting to end to stamp approved. That doesn't mean it has to happen, though.

I am going to personally contact Patty Murray, Maria Cantwell, and Jay Inslee every single day. I'm going to contact Christine Gregoire every single day. I'm going to contact the officers of Snohomish County every single day. I hope all of you do the same, because everyone else has done such a good job on some of these.

MS. JUDGE: Number 10.

Please. Number 10. Do we have a number 10? I see none.

Go on to number 11.

MS. REESE: Cathy Reese, R E E S E. I've lived here for 20 years, and have lived here with the airport for the same 20 years. Because of the airport, I ran for public office and served Mukilteo for over 12 years. I know -- I seem to know all the players in this scenario and how they work.

For the first 300 meetings that I attended
regarding Paine Field, I was very respectful. Although it's difficult to remain so, I will do so tonight.

The EA process is totally flawed. Looking at a few flights rather than looking at the actual impact is ludicrous and downright dishonest. And that's what results in no significant impact.

From the charts tonight, we can clearly see that every time anything changes at Paine Field, you need a new EA. So basically what we're saying here is that EA process will continue for at least the next 20 years. Because it will change.

The underlying theme here and the questions by those people who have been following this issue has always been: What is going on with the airport director? What is he up to with the FAA and with the executive's office? So let's review this process.

The FAA threatened the county council to withhold funding to brow beat them into passing a resolution to build a terminal or else.

Then the FAA worked with the airport director and staff to get the Environmental Assessment done. Not with an objective, third party consultant, but one they knew could produce the product that they
wanted.

All the while the airport director's boss, our county executive, expressed personal opposition to commercial service at Paine Field.

The FAA threatened the county council, now facing not getting large amounts of stimulus money, so they made a decision to pass a resolution about building a terminal, which is exactly what the airport director wanted, what the FAA wanted, and apparently what the executive's staffer wanted. How do we know this? Four words. Freedom of information act.

The day after the county passed the resolution to build a terminal there was an e-mail sent from Dave Waggoner, the airport director, to the FAA regional office which come to the FAA Seattle Airport manager Carol Summe, that said, Carol has been doing a great job of helping us navigate this swamp. This is the first positive vote on air service in this county in recorded history. Did you hear that Peter Pan nominated her for sainthood?

Well, I guess this is not the way I want to see government work. We need transparency, we don't need sneaky end runs around the people.

Everything in the EA is flawed. The notion that
there are no significant impacts and that existing zoning is totally compatible is absolutely ludicrous. Thank you.

MS. JUDGE: Number 12.

MR. QUINBY: Harold Quinby. I live at 5224 107th Street, Mukilteo. And I've lived 28 years at the end of the first runway out at Sea-Tac. I moved away from there to get away and moved up here, and here it comes.

I do believe with certainty somewhere along the line there is a propaganda minister. Hitler had one. I think people here are being snowballed. They are told a certain thing, and many things, and they are not true. Look on the other side of the wall, they are not true.

No one has talked about the aircraft fuel coming out of the back of the jet. If you're behind a diesel truck, a school bus, a diesel car, and you inhale those fumes into your car by the ventilation system, you can smell it. Coming out of the back of the airplane is jet fuel. Not all of that is burned. If it's 300 feet up in the air with ten, 15 mile an hour cross wind, it's going to come over into your property. It's going to get on your clothes, it's going to get on your patio furniture,
on your automobile, on your kids' toys out in the
back yards. It's going to get on the kids, and you,
and everywhere. I know this because I lived out
there, like I say, at Sea-Tac for 28 years.

The planes, you talk about the noise impact,
that's false, because the noise does not stop at
that line on the contour map.

MS. JUDGE: Folks, please. Listen. Please stop. We've got to stop it, or we're going to clear the room.

MR. QUINBY: Also, there's a statement here about (f) 4 talking about fields and so forth. At the end of the runway that we have down here there has been a wetlands made for the birds.

On the other side of the wetlands is a ball play field that is used quite extensively by the baseball players of the little league and the county and so forth.

Across from the main office, the main entrance of Sea-Tac air field -- excuse me, of Paine Field Air Field there's a place called Cache Park. There's a lot of soccer fields there, baseball fields. There is even a field there where you can take your dog off leash and walk. Now there are things out here that are being used.
The noise is a very significant factor, because right now there are planes that take off during the night over here at Paine Field anywhere from 11:00 at night until 6:00 in the morning, and they wake you up. I know, because I'm a member of the Paine Field Community Council. I get a monthly report on that. And the planes leave or coming in, and they wake you up. And you're still lying there 45 minutes later trying to go back to sleep.

I think that Allegiant Air and Horizon Air come here, I think they owe from us a courtesy call to them saying, Hey, your plane just took off. I thought I would be so nice and call you up and let you know that it took off from Paine Field. This is very funny. You talk about no significant impact, EA impact.

My last sentence.

E in environmental, change that to eject.

A, assessment, change that to airport.

Eject Airport.

MS. JUDGE: Number 13.

MR. DORAN: My name is Don Doran, D O R A N. I'm the current president of SOC, Save Our Communities. And I just want to start by saying I'm so proud of the community, whether you're for it or
against it, it does not matter. Just this sort of
dialogue is exactly what the FAA is hoping for, the
airport was hoping for. And to the extent that we
keep it up, perhaps we'll be successful as well.

When I spoke last at Meadowdale, I mentioned the
bogus method of drafting EA. To only consider the
amount of air traffic that the airlines admitted to
without taking into consideration the ramifications
of unrestricted growth once the operating
certificates change. That's the real change. It's
not the terminal, not the couple of flights. It's
the fact the certificate is changing.

It sounds a little bit like me telling the IRS
how much money I expect to make each year, and only
paying the taxes on that without any repercussions
should I miss my guesstimate by 50, 100, 200 percent
or more. I don't think they're going to trust me.

So the Council for Environmental Quality the
CEQ, these are the regulations for implementing
NEPA, 66.303, third party agreements. The
responsible official, the FAA, must approve the
qualification of the third party contractor, Barnard
Dunkelberg. The third party contractor must be
selected on the basis of ability. They have.
Actions. If any conflict of interest, consistent
with, and then it goes into a direction. In consultation with the applicant, responsible official shall select that contractor. The responsible official may prepare a disclosure statement - which I would love to read - from Bernard Dunkelberg for the applicant to include in the contract specifying that the contractor has no financial or other interest in the outcome of this project.

Now, Bernard Dunkelberg is a very qualified organization. But as a council member from Mukilteo in 1995, and I sat on the Paine Field master plan, they were the consultant.

As the mayor of Mukilteo in 2002 when I sat on the Paine Field master plan, they were the consultant.

As a citizen once I left public office, I co-chaired for the county executive the MRD panel. They were the consultant.

There's no conceivable way that Bernard Dunkelberg and company could document that they don't have a conflict of interest in this particular issue.

MS. JUDGE: Thank you.

Number 14.
MR. DORAN: I'm not done yet.

MS. JUDGE: I'm sorry.

MR. DORAN: I'm done with those credible comments.

I want to announce now, I'm giving up my seat to those sitting out in the hallway.

I'm so proud of everybody here.

And I want to wish my wife, on the record, happy birthday, and let me thank you for letting me come out and play.

MS. JUDGE: Thank you.

Number 14.

MS. SPAMPANI: Pamela Spampani, SPAMPANI.

It's been said that the definition of statistics is the science of producing unreliable facts from reliable figures. In reviewing the EA, not only is that statement appropriate, but it appears that the unreliable facts have manipulated to deliver a desired outcome.

Scientific data, on the other hand, is compiled of factual measurements and numbers that cannot be skewed. Airport studies show that elevated exposures to citizens living in close proximity to airport are subjected to a myriad of health issues.
They are especially harmful to those most vulnerable, such as children, older adults and immunocompromised persons with respiratory and cardiovascular diseases.

Likewise, it's been proven that living near airports increases diseases such as allergies and asthma, elevated blood pressure, increased heart attack, several forms of cancer and leukemia.

The American Chemical Society published an article last November in Science Daily titled, Hidden Threats, Elevated Pollution Levels near Regional Airports. And it applies to this EA and our community.

Scientists are reporting the evidence that air pollution are well-recognized problem at major airports may pose an important but largely overlooked health concern for people living near smaller, regional airports. These airports are becoming an increasingly important component of global air transport systems. The study, one of only a handful to -- the study, one of only a handful to examine airborne pollutants near regional airports, suggested that officials should pay closer attention to these overlooked emissions, which could cause health problems for local residents. A
description of how the pollutants disperse from the airport was alarming, and would lead sensible people to concur with their finding. Airports and communities are not a good mix.

In 2004 Allegiant began service with four flights a week in Bellingham. Today, barely six years later, they offer 32 flights per week.

Allegiant's growth pattern in this EA begins with two flights per week and projects just ten flights per week in five years. No one but the consultant producing this EA believes Allegiant's projections. Not even airport Director Waggoner, who's often stated that capacity will be determined by the market. In other words, the airlines control the growth.

And the county's statement that by accepting federal funds to build a small terminal will enable them to control growth is a fallacy.

So the initial conditions for the EA, the low levels of flights are provided by those players who will benefit by receiving a report of de-minimis impacts from the consultants.

The MD-80 series planes are older and noisy fuel guzzlers that spew greater emissions than newer model aircraft.
At best, this is a flawed document and it should be rejected. We deserve the in depth analysis and accurate portrayal of the real affects scheduled flights will have on our schools and communities. Thank you.

MS. JUDGE: Number 15.

MR. EMERY: Richard Emery from Mukilteo. I'm on the Mukilteo City Council. And the EA is clearly flawed in many ways, starting with the how it evaluates noise. But in addition, I myself am curious as to what happens in 2016, does the airport go away then?

In any project, the developers are required to do their Environmental Impact Assessment on the basis of the full project, full potential of the project, not what they think are planning for the first stage or second stage. This project is only being planned for the flights that we see presented here, but there is no limits to the number of flights, other than airport capacity, once this gate is opened.

If Environmental Impact Statement assessment was not concluded or conducted under the assumption that there will be significantly more flights, that will be flawed and deficient no matter what data are used
at this time.

In addition, noise does not stop at those boundaries, and is a constant. Horizon is very pleased with its new airplanes, ten percent quieter than other airplanes. But one of those planes is still a hundred percent noisier easier than no plane.

And recently I had occasion to meet someone who was in Highline School District when Sea-Tac expanded, and they discovered that in their school system they had to hire additional staff for outdoor activities and recess in order for there to be adequate adult supervision when airplanes flew over, because otherwise no one could be heard. The children couldn't be heard, couldn't monitor or manage the students because of the noise.

That's not an averaging noise problem, that is a significant noise impact that adds cost and disruption to people's lives. That we have an analysis based upon averaging is absurd.

And, lastly, in terms of impacts to environment, below the flight path is a ravine called Japanese Gulch. And in that ravine are a number of critical species that would have to be impacted, regardless of the noise lines, because again the noise doesn't
stop at those lines, it continues. Among them are
eagles, wood peckers, and blue herons.

So there's more to this study than I think has
been admitted. It's flawed and needs to be redone
in light of all those factors, especially the
open-ended capacity of this, if this should happen.

Thank you very much.

MS. JUDGE: Thank you, Councilman.

Numbers 16 and 17.

MR. HIKEL: Ted Hikel, I'm president of the
Lynnwood City Council.

I'm a 42-year resident of Lynnwood. Eight years
at 3820 191st Place Southwest. And planes do fly
over my house.

It's imperative that we in government be open,
honest, and transparent. And, sir, if you want to
know why people question this assessment that has
come forward, I would refer you to the reasonable
request of people that there be an appearance of
fairness. And when you show up on that screen that
the preferred alternative is the one that comes from
the airlines, people have to say, that does not meet
the appearance of fairness. You could have called
it the proposed alternative. But it is on the
screen as the preferred alternative.
I've been here a long time. And I remember when the mitigated growth came out, and everybody told us that Paine Field was going to be for general aviation and for the Boeing Company. And we believed it.

And cities like Lynnwood said fine. That means we don't have to go and look at our building codes and say, you got to put more insulation in those schools to mitigate the noise that's going to occur from commercial operation at Paine Field.

Now you're telling us, uh-oh, there's no noise. We drew the lines around it, and there's no noise beyond that. But we're a little smarter than that, because we lived here, and we know what the sound of an airplane is over our house. Even down 191st Place in Lynnwood I know what it is.

You can't come to the people and try to tell them, these are the facts, and that's it, and the FAA says that's all we have to look at.

We are people who live here, who have invested our lives and invested our money in our homes here. And if that is disregarded by the FAA, by the county council, by the county executive or by you, sir, you have done tremendous disservice to this community.

Sea-Tac has required hundreds of million dollars
in mitigation money. I believe the figure, I heard one tonight of three hundred. I thought it was something around 150 million dollars in mitigation. There's not one cent in these proposals to address sound mitigation, even though this school, and at least 12 other schools, are going to be impacted by commercial air service over a period of time if it's allowed in Paine Field.

There's a truth to the camel's nose under the tent. And that truth is, we know what's going to happen in 20 years, because there are plenty of other airports around that have done the same thing, and we know what has happened to those communities. We don't want it to happen here.

And I think we have a right to require that our voices be heard ahead of everyone else. You want to talk about NIMBY, not in my back yard, the people who live in Arlington and Monroe and Everett and Lake Stevens, they're the NIMBY's. Not in their back yard; but it's okay if it's in our back yard.

MS. JUDGE: Thank you, Councilman Hikel.

Folks, I asked you about four different times. We've got folks from all different opinions here tonight, and it's important that everybody be heard. So I would ask you to keep your outbursts to a
minimum.

Number 17 is up.

Eighteen, 19, 20 please come down and be on deck.

And I would like to thank you, we are moving along quickly, faster than I anticipated. So I'm hoping we'll get to you as soon as possible.

MS. LOCKE: Jackie Locke, L O C K E, and I live in the City of Lynnwood. And I would like to comment basically on one of the slides that was presented about alternative airports.

And I was wondering, has anyone really done research into alternative placements for commercial airports? It seems like reason would dictate that in order to establish an airport somewhere, you have to look at more than one place. And seems like Paine Field is being zeroed out as the one place that we're going to do this. And I really believe that alternatives like the one out in Bayview in Arlington area should be looked at. That airport is located in an area of farmland and area where there's far less people living there. So that commercial airport would impact fewer people over there than having it located here in Mukilteo.

If you haven't researched Arlington, then it
sort of sounds like to me that you are using public
cvenience, or the convenience of people that are
going to fly out of this area instead of looking at
other factors. And the public convenience, in my
estimation, is not a sound basis for making public
policy as important as this one.

I also want to make mention the mitigation
factors with regard to the noise levels. If the FAA
is thinking of insulating our homes, I don't believe
this is going to compensate us for the loss of
property value. And if we insulated our homes, what
are you going to do when you go outside to enjoy
your property? You're still going to be dealing
with disruptions. You can't build a bubble over
your neighborhood.

Today when I was at work I was talking to
somebody who told me that she and her husband were
looking for a house in the Mukilteo area, and when
they were at this one house, the neighborhood next
door came out and asked them, Did you know about the
Paine Field possibility of becoming a commercial
airport? And she and her husband knew nothing of
it. And after he told them about the possibility of
Paine Field becoming an airport for commercial use,
they decided not to look at Mukilteo any further.
So there's a stigma attached to living in a neighborhood that's very close to a commercial airport. And I believe that property values will go down as a result, and prices will reflect that stigma.

Thank you very much.

MS. JUDGE: Thank you, Ms. Locke.

Number 18. Do we have an 18? Number 19. No 19.

MR. EASTMAN: I'm 19.

MS. JUDGE: Number 19.

MR. EASTMAN: Roy Eastman, I'm a retired professional civil engineer in the State of Washington.

I have a problem with the way that they take care of the noise level we have around here. And I worked for the county here for awhile in the construction out at Cathcart. And at Cathcart we had an Environmental Assessment discussing the noise levels, and because of Clearview being close to Cathcart, they had to change the work that they were doing in a requirement for over 65 decibels. And this is one of the problems I have. We don't talk about decibels or anything, but anything over 65 decibels required that they fix it. And it goes
right into the area that says they will fix it. But they have to stop. Now they had to stop every night, and that included oiling their equipment they were doing the construction with, they had to shut it down. And I was there, and I made sure that they shut it down.

But that noise level is far exceeded, especially into the runway where the kids are going to school. I had a grandson down there, and you couldn't hear him talk in that school. And I can't find anybody that can tell me how many decibels is there. But you see the results of those by seeing the sites, the walls along the highway and everything else, because those are all set out in decibels. And you need to get down to where people can sleep, to where kids can look at their books and do their school work instead of trying to see the plane go over and land and what have you because of it.

And I just wanted to, I'll leave a report here, that very definitely it says they have to have no more than 65 decibels.

Now if the county can say that for one area out there, why can't it be the same for us here? We have a small amount of people, and they deserve it just as much as anybody. But there's a lot more
people than just the small amount of people there.
And I just want that to be included in there.

And I am definitely against the way that this
has run tonight. Having worked in the federal
government, why this is one that says, we can do
this, we can just change this and that and get what
we want.

MS. JUDGE: Thank you, Mr. Eastman.

Did you want to hand me a report, sir?

We'll note for the record that speaker 19 had a
report for us.

MS. JUDGE: Number 20.

MS. HOLLAND: Margaret Holland, H O L L A N D.

I'm a property owner and business owner and early
childhood educator for 40 years, 20 years in
Snohomish County and ten years in Mukilteo.

And I've gone to the last two hearings and came
away feeling very discouraged, outraged. But
tonight I'm feeling a little more hopeful with the
testimony that I've heard.

First of all, I would like to address the aerial
photo that is shown to the public. It does outline
Paine Field, but it does not accurately show the
development in the last five years which is in close
proximity to the Environmental Assessment borders.
I personally have a preschool-kindergarten that is approximately one quarter to one eighth of a mile from the boundary and on the west side. And we do hear the planes. And there are about 90 children at that location.

The EA does not take into account the area surrounding the airport. If this was a business that is stationary and releases no air or noise pollution at all times of the day and night, I believe that there wouldn't be so much opposition to this Environmental Assessment.

It's been stated that only two airlines will be allowed with minimal flights, but records show what happened in Bellingham when they expanded with the same information and promises to a much greater number of flights in a short period of time.

MS. JUDGE: Please, ma'am. Please stop.

MS. HOLLAND: Mukilteo and the surrounding area is high density family community. These families make education of their children a high priority. As quoted from the office of public instruction in Olympia, the Mukilteo School District serves 14,529 children. The Edmonds School District numbers, which includes Lynnwood, Alderwood, Meadowdale, serve 20,675 children. These numbers do not include
licensed child care centers which serve 1911 children, and licensed home centers which serve over 153. The total of these are over 37,000 children that could be adversely impacted if the airline were allowed to go commercial at Paine Field.

There's also a concern voiced about Boeing on its way out of Washington, Paine Field. This is a valid concern. I know that it will take time and much political maneuvering before this happens.

I'm totally opposed to the Paine Field expansion for our children's sake, our community's sake, and for the environment in general. Thank you.

MS. JUDGE: Thank you, Ms. Holland.

Number 21. We're about ten minutes away from a break. We are going taking a break at 8:00.

MR. HAAKENSON: Gary Haakenson, HAAKENSON, and I am the Mayor of Edmonds.

And I attended the meeting at Meadowdale High School a couple weeks ago where an Edmonds resident who was a proponent of commercial service at Paine Field testified that the Edmonds City Council had been railroaded into creating a resolution of opposition to commercial service at Paine Field.

And I'm here to tell you, and I would like it on the record, that that railroad passed through
Lynnwood, passed through Brier, passed through Mountlake Terrace, and passed through Woodway, where at the end of that time all those city councils passed resolutions in opposition to commercial service at Paine Field.

The Edmonds City Council, having heard that gentleman's comments, reaffirmed their resolution two weeks ago. So they are on the record currently.

In my estimation, from what I saw at Meadowdale High School and what I've seen tonight, the only thing that qualifies as a railroad coming down the tracks is this EA.

It is flawed, it is incomplete, it's disingenuous, and it's an insult to the citizens of South Snohomish County.

MS. JUDGE: Folks, please.

MR. HAAKENSON: And I would urge the FAA, the county executive, and the county council to create another EA where they look at the true impacts to the citizens of this community.

MS. JUDGE: Thank you, Mr. Mayor.

Number 22. Mr. Mayor.

MR. MARINE: Joe Marine, Mayor of the City of Mukilteo.

And you don't have to worry, I know I scared her
when I got up because the at last one I spoke very
quickly to get everything I needed to say into the
record. And so I've already done that, so I'm
really not speaking so much to you as I am to the
great crowd that's here. Because we are -- I
already testified, and our attorneys will as well.

I want to hit on the EA. The biggest flaw in
the thing is the fact that it is saying there are no
significant impacts. Well, obviously there are no
significant impacts because they only measured a
very small part. And given to the whole, it's very,
very nonsignificant. The problem is, we want to
expand that a little bit more. Well, how about five
more flights a day? Well, compared to the whole,
it's very nonsignificant. Before you know it,
you've nonsignificanted yourself right into a
Sea-Tac north. And that's the concern we have.

We won't allow that to developers in our city,
and certainly are not going to allow the FAA to do
the EA that way as well.

So the other thing I want to get across is the
fact that I am for the expansion of Paine Field, not
for passenger service. This is the largest airplane
manufacturer in the world housed here. Why in
anybody's right mind would they want to start
competing with that? We have got the golden goose, if you will. As what we need to do is expand Paine Field to get GE or Rolls Royce or Pratt Whitney to build their engines here. What about doing interiors at this location. What about having an engineering education school housed at Paine Field. That's an expansion we want to see. You want to talk about economic development, that's the type of economic development we want.

Any economic development we're going to get out of a few passenger flights is going to be far and away negated by the negative impacts it's going to have on the surrounding community.

Why are we mad when people say, you knew it was an airport when you moved in? Absolutely. But Snohomish County, who owns and operates the airport, when they basically rezoned all the property around this area from light industrial to residential, and they set up the mediated growth determination that said, we will discourage service because of the fact we made it residential, it is absurd to have the same county now come and say, trust us, we're just going to go to a small terminal.

So I want to make sure that here tonight -- quite frankly, they don't care. They don't have a
dog in the fight. You need to take the same passion
and talk to the county executive, talk to your
county council, get that to the State. If the State
hasn't woken up to the fact that Boeing is willing
to take the 787 line to South Carolina, and they
don't start taking Boeing seriously for this area,
we need to remind them of that. And we don't do it
by now having them compete with commercial service
at Paine Field.

If we're talking about needing capacity from
Sea-Tac, why would we look here? Given the capacity
of the need in the future, we would be looking at a
whole lot more flights that would definitely impact
airplane manufacturing.

And so what we ought to be doing if we need
capacity for Sea-Tac is looking to the north.
That's the natural drop. Has anybody looked at
Skagit County Airport? It can handle it right now.
They need to expand a little bit, but it's
surrounded by farmland. That's how you do an
airport for the future is you don't allow
residential to come in and build next to it and then
decide you're going to make it a commercial runway.

MS. JUDGE: That's it.

MR. MARINE: Thank you.
MS. JUDGE: Number 23.

MR. LORD: The mayor is always a tough act to follow. Randy Lord. I'm the Mukilteo City Council President.

So, yes, I also live in Mukilteo, and I've lived here 23 wonderful years. And there's only a few things I want to ask. I'll try to be quick about it so I can defer my time to the crowd.

So after this hearing, what is going to happen? These are phenomenal, valid issues.

By the way, I want to say thank you to SOC for the wonderful homework you guys have done. We've learned more about airplanes and airlines than I ever want to know.

What's going to happen next? We've got all these issues raised these last three hearings, and some wonderful inputs. How do we know that there will be due diligence? How do we know that the people are going to do a fair and responsible and open assessment versus a thank-you-much, check the box. I got my three hearings. I'm done.

Second. The mayor raised a point on the EA. If you EA a little bit at a time, it doesn't look like much. And it reminds me of the frog in the pot. I don't know if you've heard of it, where you throw a
frog into hot water, boiling, he jumps right out. But you start with cold water and turn up a little bit, and not so bad. Turn up a little bit, not so bad. And after awhile the frog is cooked and he doesn't even know it. And I'm afraid this could very well happen to us if we don't remind ourselves how hot the water could be.

Finally, the day night noise limit metric, that DNL line, I said this at Everett and I just want to say it again. I'm an engineer, and sometimes I have to explain engineering terms to people who don't speak engineering. This is an engineering trick that's played on you. And the best way to translate it is, I go up to you and punch you in the nose. But I don't talk to you, I don't talk to you for 24 hours. And if you average how many times I hit you, it's not that bad.

And then next thing, tomorrow, I get to punch you in the nose again. And you're going to like it, because after all, I averaged it out and it's not that bad.

So I'm going to defer the rest of my time, and I yield it to the audience in case they wanted to say something.

THE JUDGE: Next up is number 24.
Twenty-five.

MR. PAK: Hyon Pak. And I've lived in Mukilteo for the last 15 years.

And this EA is fundamentally flawed in that there's already an assumption that there's no foreseeable future increased visit, that Mr. Dunkelberg says there's no past, present, or reasonably foreseeable projects that are expected to cumulatively add to aircraft generated noise to produce a significant impact.

And this is where we all differ. We know that this is a stage where we decide whether the airport is opened up for full aviation, generalized commercialized aviation or not. This is not one of these things where Mr. Dunkelberg says that if there is a future airlines, and they get to determine with a new EA, that's not what we're looking at. Because our virginity has already been crushed. It's gone. And once that has happened, none of that is going to change, because we're still going to be subject to all this airplanes. They may be able to try to do some mitigation proceedings, but that's it. And we're still going to have to suffer through the entire situation.

And this is where the entire EA is based upon is
the lack of full disclosure. The disclosure that we want is what is it going to be looking like when the airlines, all of it, is fully operational at Paine Field? We want to know what that is before we allow this to happen.

If we know what the full capacity of Paine Field is, and the EA goes through its entire assessment based on that, then fine. But having something like the noise map that we saw, the noise map shows there was no significant impact. Well, it's like the hurricanes that take place at South Carolina, North Carolina every year. If we look at the overall average hurricane's result on a given day, it's not that significant. But it's the one day, that's all it takes.

And this is what we're all talking about is that one day, and the one airlines going overhead over the neighbors' homes. Then it's two airlines going over the neighbors' homes. Well, we want to know what it's going to be like when all the airlines are at Paine Field, because we won't know what the assessment is for this entire project, because this is a virgin territory. We're opening it up once. Once we open it, there's no turning back. And that's the problem.
MS. JUDGE: Please. All right.

Number 25, and then we're going to take our short recess.

MS. DAVIS: Kelly Davis, DAVIS.

I represent the Bluegrass Condominium Complex, which is about a mile-and-a-half east of Paine Field.

And we are already experiencing depressed home values there with this economy the way it is, which can take five years to rebound. I sincerely, I really do think the EA is severely flawed. For one, we live along 128, which is a major arterial between I-5 and Paine Field. And I for one don't want to deal with the traffic loads coming through there.

The other issue is I have a friend who lives in the flight path of Paine Field, and she already experiences noise issues at night. And so if this add more flights, it's just going to get worse and worse and worse. Like all the other people said, it's just going to catapult.

And the other issue is Kamiak High School. It's right next to the airport. So when the EA says they have factored in all the surrounding communities, it's right next to it. So how can we sit here and say this is not going to be affected, when it truly
is right next to say flight path.

So, like I said, I'm not going to give you a hammer over the head. I fully do not support this expansion, and I think it's extremely the wrong direction to go. And I yield the rest of my time to the audience.

MS. JUDGE: Thank you, Ms. Davis.

We're going to take a ten-minute recess. We'll reconvene right back where we were.

Number 26, 27, 28 you will be next.

(A recess was taken.)

MS. JUDGE: Number 26.

MS. VANDERWIELEN: I appreciate all the work putting together this document, the NEPA, which clearly is the intent to push forward with change in the certification classification for regional air general aviation for Paine Field airport to commercial, regardless of public input.

The NEPA document does not clearly define the consequences surrounding cities that will be negatively affected because of daily use is bear minimum. Is does not reflect the maximum amount. And that's a public statement based on NEPA's adopting very conservative data. 75.9 tons per year of increased air pollution is unacceptable. The
threshold may be 100, but when NEPA used conservative data, it did not show the public the full extent of maximum capacity at the airport, which put it over the threshold of significance in determining the impact to our cities.

For NEPA to say there's no impact is clearly a bias statement based on those who want commercialization.

NEPA needs to go back to the drawing board, deal with factual maximum data, and honestly deal with the truth of health impacts to our children, our adults, our environment, which also affects our water, animals, trees, grounds. Though this may seem like a SEPA report data, hundreds of thousands of lives is not just a Mukilteo issue.

NEPA does not go into great detail, because it did not clearly define the levels of pollution in Puget Sound waters. It does not clearly define the health of our communities, destruction of our businesses, or our roads. Currently Mukilteo is a state route one way in and one way out. It doesn't address the NEPA.

The fact that NEPA has not heard back from our tribes in this area, you're lacking major information. NEPA is an invalid document because we
are expecting that information.

NEPA Environmental Assessment does not say what will happen to the encroachment issues around Paine Field.

Our community depends highly on our environment. FAA will not mitigate noise nor pollution. They don't have to. They're out of the loop. What will happen to our homes, to our communities that go right up to our Paine Field border?

Publicly stated at Puget Sound Regional Council July 23rd from state's last panel, they clearly publicly stated that the encroachment over time will be removed. NEPA does not clearly make this clear. What does encroachment mean? What will that mean to our environment, our homes? Please address that in NEPA. As far as I'm concerned it's an invalid document if not addressed.

The statement needs to -- Mukilteo environment, and it needs to be redone. You need to go back to the drawing board. Thanks.

MS. JUDGE: A quick housekeeping matter before we move on. There was a pair of glasses turned in. If you're missing them, just come on up and retrieve them.

Also, I was told at the break that several
different folks turned in their cards and said they were going home because they felt intimidated by the crowd. So, again, I would ask -- I appreciate how respectful folks have been trying to hold your comments back -- that's actually what we can't tolerate. We really need folks -- everybody here, I want to hear from you if you would like to speak to us.

So thank you for your cooperation. I appreciate that.

Number 27.

AN UNIDENTIFIED MAN: Thanks for the chance to speak, and thanks for the chance -- people being here, which is part of the American way. My background is I've lived in Lynnwood for 34 years. I was a member of, one of the initial members of, my wife and I attended SOC meetings. We used to meet at the middle school down on the Speedway when Bob Stall was the first president.

My wife is a former member of the Paine Field Airport Board. She knew about the experiences she had being voted down in the democratic way by -- the board was kind of stacked, and she tried getting progressive ideas and questions, and things was always voted down.
She is a teacher of 31 year's experience, and knows a lot about the affect of noise on children, school children and learning, how when a plane flies over, they have to stop teaching for the plane to stop the noise.

One of the things that I said, I was raised in the American way. From this size, as a lot of us are, taught what is right and what's wrong. And I see there is the American way, the good way, participation this way, and going through due process, this isn't a due process.

There's a corrupt way in which -- I mean, public officials we elect turn around with our own money and take it all the way to the FAA, to the city, county, state, federal and use it against us. Which is the corrupted form of the American way. I find that kind of disheartening.

As I said, I've watched the past 15 years. We'll probably fight it with SOC 15 more years, and 15 after that, just different consultants and different public officials, different airport officials. They're always finding the same thing.

The thing I see throughout is, like Dick Cheney was asked about the Iraq war, when percentage of 56 against, he said it doesn't matter what people
think. We're going to do what we want to do.
That's what's happening here.

Anybody that's traveled all over this great
country will look at regional airports, and like a
waste land. It's uninhabitable. You can't live
there, you can't breathe there. I'm not going to
compare Sea-Tac, because it's a lot bigger. When
Boeing leaves, that's a smoking mirrors, like a lot
of this is.

Boeing, whether the diehards want to believe it
or not, is going to leave, and we're stuck with an
airport we didn't want. It doesn't belong here.
People live right next to it. And a lot of problems
usually relate to timing. These hearings are all
aimed at jamming it down your throat. He said that
the final hearings are the 5th of February. That's,
what, two weeks away. It's like they're shoving it
down your throat.

MS. JUDGE: Sir, that's three minutes.

AN UNIDENTIFIED MAN: Peace of mind, what price
peace of mind.

MS. JUDGE: Thank you so much.

Number 28.

MR. ABBEY: Greg Abbey. I'm a lifetime resident
of this area. And I think, like so many people here
in the audience, may have been confused about the
focus of the meeting. And it seems very clear this
is not a public hearing to get our opinions. So
make no mistake about it. This hearing, or this
meeting was to determine if there were any legal
reasons why that may have stood in the way of the
federally defined thresholds of significance. I
think that was exactly your words of what was
important here.

So unless any of us are lawyers and really cover
half of those federally defined thresholds of
significance, and we have a way to prove that we've
exceeded those, then our opinion is not really taken
into consideration here by this group.

However, there are elected officials. And I
think, I just want to reiterate what the young man
said earlier tonight, that what's important here is
the people in this room, if you feel passionate
about this, we can't just sit and go, Yeah, that's
right. We have to actually do something. And that
is, we've got to contact somebody who cares. There
are people who care about what we feel, because you
vote.

So we have got to do our job. You have to leave
this room and not forget about it tonight and
actually write a letter, write an e-mail to our elected officials.

And give a plug for the Save Our Community folks who have been doing a lot of ground work. They have a lot of talking points. A lot of very important work has been done by the Save Our Community people. And I believe their website to be www.socnw. That's Save our Communities Northwest. It's just an acronym.

And unless we really make ourselves heard by Aaron Reardon, by public officials who should care about what we feel, we're just wasting our time here. Really. We have to do this, take some action. And action is us getting busy writing our opinions to people who matter. That's it. Thank you.

MS. JUDGE: Number 29.

MR. SHURTLEFF: Mark Shurtleff, S H U R T L E F F. I live two point four miles due south of southern runway.

The EA has been based upon numbers that are minimal at best. And I've heard a lot of people who are saying that we need to do for maximum numbers and things. I'd settle for reasonable.

So I took a look at some of the numbers of one
of the airlines that's part of this process, and
applied a little known thing called common sense to
it.

Allegiant Air is a wonderful airline. Wall
Street loves them. They're making money. And they
do so by following a very strict formula. They go
into a smaller regional airport that's next to a
major metropolitan area, and they squeeze every
penny of operating budget until it screams for
mercy. Their Bellingham, Ms. Spampani has already
said, we've got four flights to Bellingham. And
five years later we've got 32.

Well, Bellingham services the Vancouver market.
Paine Field is going to service the Sea-Tac market
in the same manner. Sea-Tac carries twice the
passenger traffic of Vancouver International. A
little bit of common sense says in five years the
Paine Field operations should be about twice of what
Bellingham was after five years. So we're looking
at 60 flights a week, not ten. Already our numbers
are looking horribly fictitious, because this EA is
based upon numbers supplied by the airlines.

Nevertheless, once the charter is changed, we
have Southwest Airlines, who's already tried to go
into Boeing Field five years ago, and they run over
320 flights a week. So now our numbers are not ten, but nearly 400.

You know, this is sort of like claiming that adding two new lanes to I-5, and only going to be used by two cars an hour. The report is a complete and total fabrication. Totally fictional. And it's bad fiction at that.

When a publishing house comes across bad fiction, their editors have one universal response, they throw it in the trash. And the trash can is exactly where this so-called EA belongs.

Thank you.

MS. JUDGE: Thank you.

Number 30.

Please hold your applause.

MR. SUHARA: Mike Suhara, S U H A R A.

Hi again. I was at the Meadowdale meeting. I want to let you know that the capacity of this auditorium is 480 and we had standing room only tonight. I know that because of internal information. When I was at Meadowdale we didn't bother to fill that up.

A lot of people were misinformed. I was misinformed when I went to Meadowdale. This was an environmental impact study done by the FAA. It's
flawed because it goes to the minimums. Okay, like everybody said before us. And listen to what we're saying, because it's minimums. It doesn't speak to real numbers.

Another thing I was very much surprised about is, you plan to implement in 2010. Okay. When in 2010? February 5, I understand you're going to find a check mark and have your last hearing on this; is that correct? After that, how long before we see Allegiant and Horizon Air, or a terminal being built in our airport at Paine Field? Because you can't stop the ball from rolling. Okay. Well, maybe we can if you ahead and write your congressmen, mayor, city council. Remember, we put them in office. So it's coming. I don't like it, but it is coming.

I think your traffic studies are hugely flawed. Hugely flawed. I suggest you come here in the summertime when the ferries are running, when Boeing is running full three shifts, and you tell me at 3:15 in the afternoon that you can get down 527 to I-5. You can't. It will be a parking lot.

Ferry traffic backs up all the way past Olympic View Middle School, and it's a two-hour wait for ferries. You will push that traffic, that ferry traffic to compete with those airlines. Okay.
The next thing. When the airport expands, who pays for the next EA study? Will the taxpayers be the ones that pay for this? When all of a sudden the airport then decides we've outgrown the EA study that we've got, who's going to pay for the next study? Are we going to have to do that? Is the federal government going to do that? These are questions that we need to ask.

I'm not for this airport. I have a sneaking suspicion that it's going to happen. Okay. But maybe we can stop it. Thank you.

MS. JUDGE: Thank you, Mr. Suhara.

Number 31.

MR. CASSELMAN: My name is Scott Casselman, CASSELMAN. I'm a physician, and I've lived in Mukilteo for 25 years.

I'm glad to have this opportunity to read this commentary. It's entitled: Paine Field, an airport with an alternative.

Say no to passenger air service at Paine Field. Rather, make Paine Field an airport of national significance. Such a plan makes the best business sense.

What is this plan? An alliance between the free market driven by Boeing, governments, communities,
private citizens, and the University of Washington which achieves an aerospace research development and production economic engine, that becomes a monetary powerhouse serving the interests of all parties.

It clears the field for Boeing to use the airport for production and testing with maximum efficiency. This continues to attract high quality and high tech aerospace industries to Paine Field. It creates many high paying jobs, and results in less impact on traffic congestion than other alternatives. It encourages a business friendly plan that keeps Boeing in Washington. It lets business revenues soar. It allows B and O taxes to increase for the benefit of the community, because there's more business. It elevates local property values, which increase public revenues and property taxes.

And, most importantly, it allows Mukilteo to build up a prosperous community centered on whole town, offering amenities that attracts tourists who bring in cash. I suggest anyone travel down to Madison Park to see what I'm talking about.

And so thus we are considered one of the most beautiful sites in Puget Sound, Mukilteo. What does this alternative avoid? The increase in
prostitution, drugs, and crime associated with commercial aviation.

It avoids the low quality, low wage businesses that inhabit airport perimeters that do little to help local economies thrive. It avoids a dysfunctional increase in traffic congestion in a location completely compromised, Mukilteo, being one mile wide, six miles long, hemmed into the north and west by Puget Sound. Attempting to exploit this bottleneck serves no one.

So, in summary, I would suggest, let us advocate for prosperity that serves business communities, governments, and higher education.

Let's convince the FAA that this alternative is the highest and best use for Paine Field. This is a better business plan. Thank you.

MS. JUDGE: Thank you, Dr. Cassleman.

Number 32 and 36, come on down.

MS. CASSLEMAN: Jane Cassleman. I just want to say thank you to the people who arranged this. And I really want, what I'm up here for is to say thank you to all of you who have given such intelligent, well thought-out comments about the limited scope of this EA.

And as I sit here listening, I can't help but
think that if there is not a new EA done, there is something surely rotten in Denmark.

MS. JUDGE: Number 33. Number 34.

MR. COUPEZ: Victor Coupez, COUPEZ. And I read the Environmental Assessment and found it to be seriously flawed and incomplete.

And many of the points I have have already been stated, but they bear repeating by as many people who believe them.

And this is a proposed role change of Paine Field. And any environmental assessment done should address the impact of that change. Change in the role to include scheduled service means allowing any and all carriers unlimited flights at all hours of the day and night.

The Environmental Assessment draft only addresses initial construction and the initial projections of two air carriers which begin limited commercial flights.

The master plan for Paine Field calls for two terminals, yet the Environmental Assessment only addresses the initial flights requested by the airlines. What about when the first terminal is at capacity? What about when the second terminal is
built and both terminals are at capacity?

The Environmental Assessment says no residences or schools within the project area are within the project area. This indicates a thought process and approach that misses the mark.

Protective order 13045 protecting children from environmental health risks referenced in the Environmental Assessment should be adhered to and not dismissed. There are many schools in and near the flight paths of Paine Field. Why did the draft dismiss them?

This only scratches the surface of areas overlooked or inadequately studied in the assessment. Yet these issues alone are enough to require the FAA to immediately order a new Environmental Assessment with the inclusion of both new terminals, and their impact at maximum capacity, which is not covered by this draft.

The no action alternative is the only alternative.

Thank you.

MS. JUDGE: Thank you.

Number 35. And Number 39, go ahead and come down.

MR. EMERSON: Good evening. My name is Dave
Emerson. I'm in complete agreement with the previous three speakers.

My house is about 14 blocks southwest of here. My real estate office is about 20 blocks southwest from here. I'm an active member of the community, I think. And I see many, many flaws in the socioeconomic impact phase of this. It hasn't been addressed very much. The EA is required to also look at the socioeconomic impact.

Small business is the backbone of our country, of our county, of our city. There are currently 632 businesses in Mukilteo. Nobody realizes that there's that many. Out of that, there are 259 home-based businesses. Now, with the noise, number one, how many home-based businesses are going to stick around? That all brings income into this city.

When we brought Corey Company in on Bev Eds Road down here with 600 employees, that meant a lot to not just our sales tax base, which it does, to our B and O tax for the employees, to the income that flows right back into the local neighborhoods; but it also brings more tax, real estate tax to the county, to the city, and to everybody involved. Nobody has said that the airport once it gets the --
if it gets -- I'm going to go back to go if -- if it gets the Environmental Assessment approved, nobody has said what the income from these other people will make.

Right now we've got engineers, we've got architects, we've got high end IT guys making over $100,000 a year that can afford the homes along the waterfront all the way from Edmonds, Lynnwood, Woodway, all the way into Everett. These people can afford these higher-end homes that we now live in.

If we bring in flight attendants, we bring in mechanics, we bring in that, they are going to afford an average of about a $200,000 less home.

We've already had a major impact on the market. And if these people come in and they say, we can only afford that much of a house, we want to go into a smaller house, we want to retire into a retirement community, we want to go into 1800 square feet instead of 31, 32 hundred square foot home, who are we going to sell them to if we don't have the professionals here that have small businesses that make the backbone of this community?

There is a thriving community here. Everett has over probably 30,000 business licenses. Lynnwood, over 20,000. And I think it's time that we look at
the economic impact that these small businesses will make here, instead of the airport, so we can get them spaced around here in the property that we have and in the areas that we have already zoned for them.

I think it’s worthwhile to get all these high end people in here so that we have somebody to sell our high end homes to, that we don’t have to give them away in order to step down or step across to something else.

MS. JUDGE: Thank you, Mr. Emerson.

Thirty-six.

Number 37.

MR. NELSON: I’m Harish Nelson, window cleaner. And I oppose this development on this Paine Field, because Paine Field -- and I think that we need to recognize that a certain amount of business is okay, and all we can do, and Greg Abbey stepped up here and said we need to approve the alternate of the reports and how it was conducted, or we can consider that it’s between business and residents. And the resident is the investors like us who are investors and the business investors.

But expanding airport is not going to be good business, because this is going to bring in a bunch
of people that are no good into the area, the
undesirables that don't help a lot of the stuff that
the rest of us do. And I don't think that will
succeed too well because Boeing, world's largest
building, here it is, extra large airfield and
airstrip all to itself.

And in just the current business situation at
the county airport is going to maintain its kind of
a traditional aspect for awhile, but just in case it
doesn't happen, we should be stern against this
composition that's going to take us away, make us
all rich, like they say it will, or certain people
that are going to be culturally enhanced or
enlightened by the development of some airport
around here that we already have to deal with.

And I think that it's not too smart of us to
accept the airfield for what it is. I think it will
continue forward in our business profitably and the
FAA will continue to make money with its projects in
other locations and stuff like that, and Paine Field
doesn't really need these airports right now,
because this affects so many important and stable,
middle-type of person, and not our -- the littlest
beggar on the street that's always giving us
problems. And the police officers, they're always
wanting us to give them money for, I don't know what the heck they do.

But I don't think an airfield is too good. Am I through?

MS. JUDGE: You got 30 seconds.

MR. NELSON: So only so many of us that oppose the airfield aren't those that live far enough away to really take advantage of the airfield, and listen to the airplanes coming in and out. And they all want one, and so I don't think they represent those that deserve an airfield around here.

I think we should love Paine Field for what it is right now, not add anything to it, because it's going to go the way it is. It's kind of cool the way it is.

MS. JUDGE: Thank you, Mr. Nelson.

Number 38.

MS. GREGERSON: Jennifer Gregerson, G R E G E R S O N, resident of Mukilteo. And I represent Mukilteo on the city council.

I think that the Environmental Assessment should examine greater potential for the results from the change of the operating certificate for the airport, because that's the real change that's proposed here for Paine Field, and it's something that will affect
our community and our area for much longer than six years. I think that the unconstrained potential will really change Paine Field forever, and at least one other alternative should be added to the Environmental Assessment to examine the possibility for additional flights.

Someone spoke about using other airport examples, or other market examples, and I think that would be a reasonable way to consider the, at least part of the actual potential of changing the airport certificate. So I would ask that the assessment be considered, and the assessment be adjusted for that.

And I also thank all the residents who took their time to come out tonight to tell you what they have been thinking and feeling, and appreciate the opportunity.

MS. JUDGE: Thank you, Councilwoman.

39. And 42, 43, 44.

Number 39.

MR. FUSSELL: Mark Fussell, I live in the Lake Serene area.

A lot of good points have been made here, and I'm not going to go over that. I just have a couple points to make.

One is that as a representative of the Lake
Serene Community Association, I've had the opportunity to talk to, oh gosh, well over 100 households, and there's a lot of community concerns, various concerns, but Paine Field trumps everything. Hands down. That is the number one thing that ignites everybody. I just thought I would make that known.

It's something that I've lived with, planes overhead. You stop what you're doing, watch it go overhead, then resume your conversation. But this whole process is essentially death by one thousand cuts. This is the first cut.

And the engineering model is simply ludicrous. This is essentially how development works, and how it has been working in our neighborhood is that a house gets built, it meets code, fine. Everything is great. House gets built, meets code, everything is great.

Well, a few years go by, and all of a sudden you've got 100 more houses, and nobody is looking at the cumulative effect. And that's what we need to look at here is the cumulative effect.

And something that I also wanted to mention is that on the map up here, just out of eye where you can see is Lake Serene. It wasn't included in
anything. And I just thought I would mention that there are blue herons, eagles, otters, turtles. It's a very fragile lake. It's very shallow, small. The water quality has been trending dirtier slowly. I do the water quality monitoring for the lake, and there's no mention of that as any kind of factor. But those statistics are available in Snohomish County in surface water. And you can see them any time. I'd be happy to send you a link to show you how it has been trending upwards.

And I would also be happy to send pictures of various wildlife. So those are essentially my two concerns is to just let you know the group's thinking, and also showing just how narrow the EA really is, and how unrealistic it is.

So thank you.

MS. JUDGE: Thank you. And if you did have data that you were going to send in, you can send it to the addresses that are posted out there.

MS. JUDGE: Number 40.


And before I start, I would like to qualify what I'm going to offer tonight. I grew up under the
runway at John Wayne Airport in Southern California. And so I've seen promises made and promises broken. As I'm thinking here tonight, they're back.

The EA that has been presented tonight is fundamentally flawed. It is not comprehensive. It is an EA plan borne of special interest. The type that stinks about what's wrong with government.

A couple points I want to address. First of all, the Snohomish County News Tribune speculated, are these hearings meaningful? We are taxpayers. We are homeowners. Property owners. We are families. We are neighbors. And we are from all sides of the political spectrum. And they damn well better mean something.

In addressing one of the topics, or one of the sections in this report, the socioeconomic, environmental justice, children's environmental health and safety risk, I have two points.

First of all, was the correlation between the presence of an airport and prostitution, drug activity, and gang violence looked at? I didn't see it. This is going to drain county resources required to fund additional sheriffs.

Furthermore, this is just one additional tear at the fabric that makes our society stable. It tears
at neighborhoods. It tears at family to have these, the corruptive forces of these things brought closer to our residences.

I look at the Gibson's Traffic Consultant Report, and that really wreaked. Not once did it fail to collaborate with the Regional Transit Authority's plan for mass transit. Seems to me, didn't we just deliver a novelty, light rail to Sea-Tac Airport? Where did it address how it could fit into that plan? It didn't. That was one reason it is flawed.

The service radius information was presented, and there's a very interesting topic about this, and I'm going to call it the BA 48 syndrome. BA 48 is British Airways Flight 48 that leaves Sea-Tac at about 6:30 in the evening, a heavily loaded 747-400. And go home, get out your maps, take a ruler and draw a line between the runway at 34 right at Sea-Tac Airport and watch where it passes over Paine Field. Smack dab over. And a fully loaded 747 taking off on a clear summer evening, it's not much of an issue, it's flying about 8,000 feet at that point. But on a stormy night where it's southerly winds, reduced visibility, you have a flight safety risk, and the FAA needs to know that.
Thank you very much.

MS. JUDGE: Thank you, sir.

No. 41. 42. 43.

MR. BOYER: Ray Boyer, I've lived in Mukilteo for 25 years. I'm a Boeing engineer. I'm just going to read a letter I sent to some politician last time.

I am writing this because I am deeply upset by the possible of expansion of Paine Field to include passenger service. I'm also deeply upset by a very limited and very flawed Environmental Assessment concerning the 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 use, making the analysis meaningless, even if it were accurate. I believe the EA is wrong in almost every way.

Snohomish County promoted the unincorporated Harbor Point area to be built with expensive homes and schools adjacent to Paine Field, while taking FAA dollars, as well as tax dollars associated with these expensive homes. This area was later annexed into the City of Mukilteo. This airport expansion will adversely affect Harbor Point area and
Mukilteo. I believe this effect will be drastic. I believe the 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 wellbeing of residents, adversely affects Snohomish County economically by diminished home values, lead to increased crime, increased 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 will attempt to stop the airport expansion, even if it means giving FAA airport funding money back.

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

In 2002 then Boeing commercial Airplane CEO Alan Mullalay said that the traffic in this area was not competitive. He stated the company may leave Washington to a house labor committing, citing traffic as a major concern. The large roads that
surround Boeing's Everett plant promote Boeing's
cOMPETITIVENESS by MINIMIZING DELAYS in the COST of
shipping. THAT INCENTIVE for Boeing should not be
TRADED AWAY for the CONVENIENCE for a FEW who don't
want to drive one hour to Sea-Tac Airport, or for a
FEW low-paying jobs associated with the EXPANSION of
airport usage.

From a Herald article written in 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
three 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,
thereby promoting Boeing's competitiveness.
MS. JUDGE: Your time is up.

MR. BOYER: One sentence. 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.

MS. JUDGE: Thank you, Mr. Boyer.

Number 44.

MR. GREGERSON: Bill Gregerson. I live at 13320 Beverly Park Road. And I've lived here my whole life. And I think what the previous speaker said was right on, and I think our community is fully behind Boeing, they're fully behind every business that operates out of Paine Field, all the aircraft maintenance businesses, the new place on Beverly Park Road. Our community has always been one hundred percent behind every business at Paine Field.

We are against changing the role of Paine Field as the only thing we are against. We do not want airline -- passenger airline at Paine. We are completely behind everything else to do with Paine Field.

I don't see why we should be exposed to, you know, what the speaker number two was talking about, all the health affects to our children. All the
increased pollution, the fine dust particles, all
the fuel particles, all that stuff that's going to
be added that shouldn't be.

We did a mediated role agreement in 78. We've
lived by that. We've planned our communities. Just
like what just went through Olympia, everything was
planned. Everything. We've done everything we've
been required to do.

Anyway, I don't think we should change the role
of the airport.

MS. JUDGE: Thank you, Mr. Gregerson.

Number 45.

MR. SAUL: Donald Saul, S A U L.

First, I want to say that I appreciate the
addition of this third meeting. And I especially
want to thank the people in Lynnwood for allowing it
to be held here in Mukilteo.

I and my family moved here to Mukilteo from
Minnesota a mere seven months ago. Not long
compared to a lot of people. And yet we've already
been knitted into the community and to the people
here. We were very fortunate to purchase a home in
the southeastern section of Harbor Point which backs
up to the large Snohomish County green space. Our
home is very near the end of the long Paine Field
runway.

And over the last seven months we have enjoyed seeing the vintage planes and the other small planes passing overhead. We're frequently on the approach path for one of those runways.

But the noise from the large planes being tested and delivered disturbs the solitude and our enjoyment of the forest behind our home.

The DEA is flawed. And we are against the reclassification and the expansion of Paine Field for the following reasons.

Number one. Once the door is opened, as many have said, the amount of aircraft operation will increase far more than those projected in the DEA due to the FAA's inability to restrict the number of airlines or flights, and due to the construction of a second and much larger passenger terminal.

Number two. Traffic and commerce on Mukilteo Boulevard will be significantly impaired. Even if it's widened to accommodate the additional traffic, that means needed parking spaces in the surrounding businesses will be lost.

Carbon monoxide emissions will most assuredly increase to well over that 100 tons per year line when fully operational, and therefore will not
conform under the federal clean air act.

Finally, number four, because we are left with a feeling that the DEA was not developed in good faith, we cannot agree to its findings. A separate and complete assessment using reasonably foreseeable cumulative impacts must be performed on someone else’s dime and then vetted with the affected communities.

Mukilteo is a fantastic, warm and friendly and safe community today. We hope to enjoy for many years the same quality of life we bought into just seven months ago.

We urge the rejection of this DEA and the request. Thank you.

Number 46. 47. 48.

MS. DANGEL: Laura Dangel, D A N G E L. The point I wanted to make is I know a lot of beautiful places. I know a lot of beautiful places where there's no trains, there's no freeways, and there's no airplanes. And I love visiting those places, but I don't live there. And the reason I don't live there is because I live in commutable distance to where I work. Probably people here could share that same feeling. I'm just like everyone else. What draws us here is a healthy, diverse economy. And
it's a healthy, diverse economy that's going to support the home values in this area. And it's the proximity to good paying jobs that's going to support the home values in this area. And I think there's been a lack of understanding, that there's unbalance that's gone on here.

I believe that not only will the commercial air service bring jobs to this community, but I think it would actually encourage other businesses to do more business here and maybe establish their businesses here.

And given that Boeing is diverting some of their business elsewhere, and our current unemployment issues, it seems that this community should actually open their arms to this idea, even if they have maybe some issues. But to rail against it seems unnatural.

And if I have to speak specifically to the Environmental Assessment, I would say maybe it might be short in taking into account that there might be more positive rather than negative affects for this community. That's all.

MS. JUDGE: Number 49.

MR. ADAMSON: Tim Adamson, A D A M S O N. I've been here five years. I moved here from Atlanta.
I lived under the approach end of one of the runways in Atlanta most of my life, and just about never notice the airplanes there. I know you guys won't agree with that. But I didn't know what a kid with asthma was. I didn't know what a prostitute was until I saw it on television shows in 1970's.

And the idea of thinking that airline service would suddenly have prostitutes walking up and down Mukilteo Speedway and people increasing drug use is kind of ridiculous.

A community thrives on transportation. We have trains, we have busses, we have ferries. And if bus service increases, if train service increases, nobody would notice. If we had a hundred more trucks going down Mukilteo Speedway every day, nobody would notice.

MS. JUDGE: Folks. Please.

MR. ADAMSON: If ten more corporate airplanes took off out of Paine Field every day, or even 20, nobody would even notice. But because it's an airline and it's a public hearing, everybody is making a big stink out of it.

The only way most people would even notice airlines coming in and out of this airport would be if they looked up and noticed it actually said
Horizon on it.

We have the biggest commercial airplanes made in the United States taking off and landing here every day. We have airplanes shooting approaches that are being made at other points around Puget Sound taking off -- not taking off and landing, but low approaches, which is virtually the same thing as a takeoff and landing. We have aircraft flying low approaches here. Nobody pays any attention to that. We're not up in arms over that at all.

MS. JUDGE: Excuse me, that's out of order. Knock it off.

MR. ADAMSON: But because it's airline service, everybody wants to protest it.

I feel that airline service in this community would certainly help bring more business into this community, low impact business. We're not talking about a factory with 10,000 people, we're talking about, you know, small businesses that, you know, maybe have two or three people. In this economy small business is almost the only way you can expect to have a job and retirement.

Thank you.

MS. JUDGE: Thank you, Mr. Adamson.

Number 50.
MR. LEE: Good evening. Thank you for the opportunity to express my opinions. I'm Brainard Lee.

I'm one hundred percent in favor of this airport. I am a pilot, I'm going to fly from this airfield.

You'll notice there's been a lot of talk about the birds, the owls, and the herons and the eagles and so forth. They're not bothered by airplanes. That's why they're still here.

I am a retired Boeing employee. I have a job now where I service all of the schools in Mukilteo on a daily basis. I'm in those schools quite often, and sometimes late at night.

And I can say without any doubt whatsoever, the noise impact from the airplanes at Paine Field have no impact on our schools, the local schools. You can't hear any of the airplanes from inside the schools. If you're standing outside at Kamiak, you can barely notice an airplane is talking off. And it has no affect on any activity that's going on.

The busses and the motorcycles and so forth are more noisy than any of the airplanes that we hear flying overhead.

We've seen lots of growth in the area, and it's
a fact of life that people like to live close to
where there's a transportation hub, and that's why
you see lots of businesses move into the area.

An airline service has been proposed here would
be a boon to this area. I for one hate having to go
down to Sea-Tac and paying expensive parking down
there, plus a hassle to get there just to take an
airline flight. I can't wait to get on my own local
airline and go where I want to go.

I think it's a little bit selfish for us to use
these airlines, I think everybody in this room has
been on an airliner at least the last few years.
And I don't see why we should have to let people at
Sea-Tac listen to our takeoffs. If we want to go on
a vacation or travel, then it's our own community
that should listen to our own takeoff.

Yes, there will be a little bit more, especially
if you live directly under the flight path. The new
airplanes are much quieter. The MD-83 is an older
airplane, it won't be in service more than probably
five years. All the new airplanes, you can barely
hear them take off, especially the Q400. It's a
turboprop.

I enjoy standing by the airport listening to the
airplanes take off. And I can tell you right now,
the Q400 is a big disappointment because it’s so quiet.

This airport was in use when the F-106 fighter planes were here, and they literally shook buildings when they took off. But even so, people continued to move into Mukilteo. It’s a wonderful place to live, and I think the advent of these airlines coming to Mukilteo will enhance our economic viability, make it a better place to live.

MS. JUDGE: Thank you, sir.

Number 51.

Folks, I think we’ll probably go to about 9:30 then take a five-minute break.

Number 52. 53, 54, come on down.

MS. PAGE: Wanda Page. I live in Everett, have lived in Lynnwood. I’ve been here for a long, long years.

I’m an administrative assistance to the chief of police. And I am briefly worried that there has been no studies about what can and will come from the problems that bringing this to Paine Field will do. Who’s going to pay for all the police cost that you are going to need to take care of much more activity that is going to go on in the area? And who is going to pay for the roads that are going to
use all the extra traffic? And we are not looking at the social part of what goes on daily in a community. We're only -- got way off on noise. There's so much more entailing in this than what we are discussing.

And I know for a fact someone that I know that lives out in Arlington, has lived there for over 25 years in a very nice home, residential with five acres, and the Angel of the Winds went in, and now they have had major break-ins in their very nice homes when they had not.

So we need to be wise, and we need to open our eyes and not just focus on one thing, and realize the impacts overall that this will have on this community. Thank you.

MS. JUDGE: Thank you.

Number 52.

MS. MCKINLEY: Carlin McKinley, MCKINLEY. And I was actually going to give up my turn, but I just listened to three people tell you that this is going to bring great business into the area, it's not going to hurt our quality of life, and it's going to be very desirable to live around the airport. And all I have to say to you is Sea-Tac. Nobody lives in Sea-Tac because they want to. They
I live there because that's all they can afford.

I have been in real estate for over 30 years. I have been a flight attendant for 20 years. Back in the day I actually had both jobs at the same time because flight attendants didn't work every single day. So I have done both. I can tell you unequivocally that your property values will plummet.

Secondly, the air will get much worse. The particulates in the air, jet fuel comes out of the engines and atomizes into the air, and it drops on everything. It will drop on your cars, your houses, your lawns, your dogs. It will drop on you. And I know this for a fact because I did work for the airlines for 20 years. I was married to a pilot, and my father was a captain with PanAm for over 30 years. And I can tell you that no self-respecting pilot or flight attendant that could afford it ever drove their good car to the airport to get the fuel on it, because the fuel ruins the finish. And that is a fact. Employee parking isn't near an airport, because you take a bus from the parking lot to the actual terminals.

I now live in the flight path of this airport that's trying to come in here. And, yes, when
Boeing does come over, I hear them. And when the little airplanes come over, I hear them. But that is a total different animal than the flood gates we're opening on this.

And I have been in this business, my father started taking me around airports when I was six months old. I have been in this my whole life. And I'm telling you, I don't care what three people got up and said, it won't bring the kind of businesses to our area that you think that you want to have. It will not.

And I'm telling you, that -- I'm telling you, it's not a good deal for us. We need to oppose it at every turn. We need to write every senator, everybody. Write everybody from your senator on down to the county council, and especially Aaron Reardon.

There's a man that talked about UW tonight putting a facility here. Let's think of some other alternatives besides wrecking our environment.

MS. JUDGE: Thank you.

Number 53 and 54.

MR. HINE: Ron Hine, H I N E. I need to be honest, apparently I was a fool for moving next to an airport. Apparently I was a fool for believing
that politicians could or would keep their word about keeping commercial traffic out of Paine Field. So as much as we want it, we don't expect the council to abandon negotiations with the airlines. However, we expect honesty. Let's be honest about what we're doing here. This is not about cutting 20 minutes off the commute time of travelers.

Why did these airlines come to Paine Field? Is there a sudden spike in travelers going to Las Vegas? The last time I heard Las Vegas was hurting from the decrease in travelers. No, this is one thing, corporate welfare. Sure, the airlines would rather fly out of Paine Field, it will be much cheaper.

So let's be honest. This is an effort to trade the value of our homes and the health and safety of our community for corporate airline profits. This is eminent domain with wings. Only it's worse, because no one is going to offer us fair value for our homes. We just get to watch our home values diminish until there is no way that we can sell our property without taking a significant reduction in a lifelong investment.

So we have to be -- let's have an honest discussion about the impact of this decision. Let's
evaluate the impact the maximum number of flights these airlines can make from Paine Field. Let's have an honest assessment about what this will do to property values. Let's be honest about the welfare package given to the airlines and financed by selling the value and quality of our neighborhoods.

Let me tell you about a cost that will not show up in your reports. My mother-in-law is 83-year-old. She has a limited amount of money. We're worried she would run out. Our house is too small to take her in, so try and help, we had plans drawn up to add a room. We wanted her to be able to spend her final years living with family.

Just as we were about to select a builder, the word came down about negotiations had begun with the airlines. We cannot afford to put money into a home only to watch the equity disappear. So my mother-in-law is now living in a nursing home. She is too old to care for a pet, so she can no longer have the cat that she loves. She spends most of her time alone.

So how many stories like this will there be? Kids that can't go to college because of lost equity, retirement plans lost, people forced from their homes because the value of their homes are
under water. I guess these bargain basement prices will be another gift to the business community.

How quickly everyone has forgotten that Mukilteo was voted one of the top ten places to live in America by Money magazine. Well, none of us have forgotten. What we are asking for is an honest evaluation of the impact. Look at the maximum number of flights and the maximum damage commercial traffic will inflict on this community. There's already too many human costs that will never be evaluated.

Please, at least be honest about what is being evaluated. Thank you.

MS. JUDGE: Thank you.

54. 55. 56. 57. 58.

MR. LUCZYK: Paul Luczyk, L U C Z Y K. And I live in Mukilteo, so you know where I'm coming from here. I get a kick out of these people who love airplanes and loving flying airplanes, say you get used to the noise of the airplanes, you don't hear them anymore. I think they call that a hearing loss.

My business, I'm a professional home inspector, so I see homes all the time, inspect homes. Occasionally I get down to Sea-Tac neighborhood.
Kinds of depressing. Homes down there available in the 40's and the 50's were probably very beautiful homes. Very nice neighborhoods. Not anymore. Insulation on the houses in these homes, try to sell them, they will have 36 inches of insulation out there. That's a lot of stuff. Triple paine windows to help fight the noise down there.

Last time I was down there I can remember seeing an abandoned school. I wonder why that school is abandoned. Picture that at Mukilteo. I don't want it. Most of the people don't want it.

People who live away love airplanes. Let them enjoy their airplanes somewhere else.

MS. JUDGE: Number 59. 60. 61. 62. 63. 64. 65. 66. 67.

MR. PARK: Dan Park, P A R K. And I'm a resident of Mukilteo. I would like to provide -- I'm kind of a numbers person, so I'd like to provide a few numbers to the audience when you write in to the congressmen and leaders that we've elected.

If we look at the EA study and the numbers that they took from the airlines, do they make any sense? From Allegiant's own website, 2004 to 2008 they grew 350 percent in flights. They're doing 14 flights a week, which is more than the flights -- or 14
flights a week, which is about the 12 flights that they're talking about here. Does that make any sense?

They have 330,000 passengers for that. We are forecasting two airlines have 238,000 passengers. Does that make any sense?

When we look at currently out of Bellingham - this was out of Bellingham that we're talking about - out of Bellingham they have over 100 people per flight. And the forecast says they will only have about, even five years from now, they will have less than 30 people per flight. Can they make money at 30 people per flight?

So if we just look at the numbers, and I don't have all the facts to do the analysis, I'm just doing it from the general numbers.

The second piece of facts that we want to take to our representative is the cost of this. If you take Burien as an example that was just talked about, if you look at the numbers, the average house decrease in value is over ten percent. That would cost this area over five billion dollars. That would reduce our tax base by over $52 million dollars.

If you look at this, the sales tax alone on the
flights that would be going out of here with 330,000 passengers versus the 238,000, that would only generate about $3 million in taxes. Where are they going to get the difference in taxes?

If this is supposed to be economic development, how do we cover those kinds of costs to lose $52 million in property taxes and five billion dollars in house value? Thank you.

MS. JUDGE: Thank you, Mr. Park.

Number 68. 69.

MS. ROBLES: Michelle Robles, R O B L E S. I represent the City of Mountlake Terrace Council, as most of the council members could not attend tonight.

As you heard from previous mayors of different cities, Mountlake Terrace did pass a resolution requesting that there be no expansion of flights at Paine Field. We are very happy with Boeing being there. They do a good job. They're an economic drive. They will in fact bring in jobs in this community, and have continued to do so for a number of years.

I do not believe airport expansion will provide that to you.

I currently live at the county line at 231st and
61st. I am the outer regional marker of Sea-Tac, I'm at the outer -- excuse me, outer instrument marker of Sea-Tac. I'm at the outer marker of Boeing Field. I will be in the outer marker of Paine Field if there is expansion. I currently hear the planes all the time. I can tell you September 11, it got really, really quiet. First plane that went over scared the hell out of me.

But I will also admit that as an elected official, I find this very appalling that an environmental impact study is done to a minimum standard.

By trade I am a pharmacist. There is no drug that comes through the Federal Drug Administration that is allowed to go through at minimum standards. If you will not put a drug in your body, why on earth would you put a plane with 350 other human beings in the air on minimum standards? You don't.

My next concern, and it is -- I was on the MRD panel. It has been a repeated concern of mine. And I don't understand why the FAA does not talk to homeland security or the department of defense, but it is my understanding that most of the flight plans for planes do in fact go out over Possession Sound. There's Naval Station Whidbey, there's Naval Station
Everett. Naval Station Everett was very strongly lobbied for by this community to have it here as an economic driver. It has a multi billion dollar federal asset called the USS Nimitz. If the Nimitz is in port, given current post 911, and current recent things that have happened in the news where people trying to use planes against us, why on earth would you fly a fully loaded fueled plane out into Possession Sound with the Nimitz sitting there, and having no Navy comment at any time on the expansion of Paine Field. I have never heard nor seen a single comment from the Department of Defense, the Department of Navy, Naval Station Whidbey, Naval Station Everett, nor have I heard the FAA comment on that. And I'm sorry, I just guess that's really a problem.

The next and last point is that there's no requirement for the airlines to mitigate for any infrastructure improvement. None. They don't have to pay for a single penny for any road that they get business off of. But you will, I can guarantee you. You will pay for infrastructure that is already aging and incompetent and unreliable. And airlines will put people in cars who don't carpool. And you're going to pay for it by sitting in traffic and
by being asked to pay for more road improvements.

Thank you.

MS. JUDGE: Thank you.

Number 70. 71.

MS. BOAZ: Good evening. Melody Boaz, I live here in Mukilteo. We have lived here about 11 years.

I have several responses. I'm, of course, like so many, I don't think you need special expertise to be upset at the short sightedness of stopping at 2016; at the assumptions about traffic without any particular evidence presented when we all know better. And in my case, sheer curiosity about what they were saying about the socioeconomic finding of things.

Also, I think they are very apparent no matter what your field of specialty might be.

I was so impressed by so many of the speakers with engineering backgrounds and scientific backgrounds, and I think we all learned a lot that really underscored the problems with the current study. So there's no point in saying anything more about all of those.

What I would like to bring up are two, kind of. One has to do with the noise of the planes. In a
way I am really contradicting the fellow who said that the Q400 is very quiet plane. I will agree that the Q stands for quiet, that's why it's there. But what they really brag about in their own materials from Bombardier that makes the plane, is how quiet it is inside because of all the extra stuff they do to mitigate the extra noise of the way that particular prop plane works.

So, yes, it is a prop plane, which I guess saves us the jet fuel, but it's a particularly noisy prop plane.

And, you know, personally I enjoy those summer Saturdays listening to Paul Allen's plane take off. And I know when I'm in the kitchen sink that one of those old World War II radio engines is coming over, and I like to go out and see them. That's curiosity. This day-in and day-out would not be.

The other thing is, we're all concerned about the Pandora's Box of, okay, so many planes now, but what if we get some fully loaded even 737's taking off?

Sure we've got Boeing, but those planes are, A, empty; and, B, with minimal fuel. And I think, and I'm not 100 percent sure about that, that they also operate under some noise restrictions, especially
certain hours of the day. But when you have a fully loaded plane, fully fueled taking off, it's going to be making different noise.

So it still just comes back to, I can't believe that the FAA -- my final point. The FAA. I'm assuming that the final decision is going to be made in Oklahoma City, that being where the FAA actually is. I would like some people from Oklahoma City to come up here and to realize that the area around the airport is not empty, for crying out loud, like it is where many, many, I mean, hundreds of acres around the Oklahoma City Airport. And we don't have eight-lane roads and four-lane roads with the center median coming into the airport from every single direction. You know, if they could actually drive in Mukilteo and see where it is and where we live.

And the fact -- I mean, I didn't know it was legal to have so much -- I mean, when we first moved here, I didn't see how it was legal to have houses so close to the Boeing plant.

MS. JUDGE: That's the three minutes.

MS. BOAZ: Thank you.

MS. JUDGE: Number 72. 73.

MS. HUDEC: Alice Hudec, H U D E C. And I live up 92nd, so I'm literally across the street from the
runway. I want to thank you for the opportunity to speak. I was going to point out the limited flights looked at by the study and the adverse affects on Boeing, but as that was said so many times, I will go to the fact that when I moved into my house I knew Boeing was next-door, that’s why I could afford it. And while a flight or two was okay, the commercial airport is totally different.

The fact that my kids have said, hey, mommy I smell jet fuel, or I smell a plane, shows that pollution is a factor. And I invite you to come over and smell the GP after one takes off in my yard.

We also get film on the windows if we park a car for over two or three weeks. We’ve had friends whose cars were there, and windows were disgusting.

As far as the noise not being an issue, I invite you to put my kids back to bed after the plane wakes them up at one a.m., and clean up the broken drinking glasses I’ve had in the kitchen being knocked off the counter from vibration.

For the record, as far as the owl I saw up here, he’s been in my yard, too. And we also have a nesting pair of bald eagles.

Thank you.
MS. JUDGE: Thank you.
Number 73. 74. 75. 76. 77. 78.

MR. TISDEL: Greg Tisdel, T I S D E L.

Fifty-three years I've been lucky enough to live in Snohomish County. Thirty-nine of those I lived at 15206 44th Avenue West Lynnwood, which is right by Lake Serene, which is right under the flight pattern.

And I grew up with all those noisy air force jets, and went to school with all those noisy air force jets, and I learned a few things.

I guess a couple other things that do some qualifiers here. I am co-chair of a citizens group, Citizens Right to Fly From Paine Field. It's Snohomish County-wide, because it is a Snohomish County asset.

There are a lot of folks asking, how do we get involved, and how did we get our voices heard, because it is a county-wide asset. And there are members of that organization from all the communities, all the zip codes in the county.

I've spent 20 years on Puget Sound Air Pollution Control Agency's advisory board. Am I an expert? No. But I can read reports, and I understand how PM 10 and VOC and all that stuff go together to make
pollution.

And I think that it should be understood that we have an air shed, and so it isn't just the pollution and the things that might happen at Paine, it's also Mukilteo Speedway, it's also I-5, it's also what happens in Clearview, all those go together. And we read all that stuff.

And, for the record, it should also be known that the biggest contributor to PM 2.5 that was talked about earlier is not jet fuel, it's wood stove smoke. And it's automobile exhaust. And that's on Puget Sound Clean Air Agency's website. So I would encourage you to go read that.

I've read and reviewed the EA in its entirety and found it to be very complete. It's comprehensive. It addresses the transportation, the air quality, and the noise issues. That's what it was set out to do, and that's the scope of the study. It was very adequate, and I really see no reason for further scenarios.

If you look at it and understand what you're reading, it takes into account that all the trips are new trips. And those trips would make it a conservative report.

Many studies have been done that was talked
about tonight, other airports. Go read the LAT study. They did a very comprehensive support.

So I will be submitting written comments to the FAA.

MS. JUDGE: Thank you.

78. 79. 80. 81.

MS. CALLFAS: Victoria Callfas, CALLFAS, and I live in Harbor Point.

First, I'm sorry that a lot of the people that are pro expansion left so we did not hear them. This is definitely a crowd that is anti. And I don't like them, because I am.

When my husband and I bought our home in 1989, we knew Paine Field was here, but we were assured it was an airport which was used only by Boeing Company and small private aircraft. It was not intended for commercial passenger airlines.

The individuals that say there will not be any impact to the air quality, vehicle traffic, the noise factor to schools and businesses that are already located here are living in a dream world. Who will end up paying the cost to soundproof the schools, homes that will be impacted by the additional airplane noise, improvements to the roads, and additional police, fire, and medical
services? And the answer is the taxpayer. You and me.

Pollution from additional flights will have an adverse affect on the air quality, and therefore the health of the residents, and especially the children. As there are numerous schools in the area, there are plans to build a new terminal to accommodate commercial airlines.

Do supporters really think that all this expanse is for a few flights a day to Spokane and Portland and twice weekly to Vegas? Look closely, and do not be surprised if some larger carriers are not already making plans to include flights from Paine Field to other locations, as no limits can be made on airline traffic growth. The largest planes can land at Paine Field as they were built and tested here at this airport.

As for Boeing, will the future increase in airplane traffic give them a reason to leave the area, as I'm sure they will not want to compete with passenger plane traffic takeoff and landings.

Also, where are all these vehicles for this increased passenger people going to park? Where are they going to build the garage? Excuse me.

A decision has already been made, and the
hearings are not going to affect the outcome. The FAA, the commercial carriers, and the firm that did the study do not live or care about what impact this will have on surrounding community.

We are not against growth, but at what cost? We want to become another international airport in the future?

Again, to supporters of the expansion of commercial passenger service, be careful what you wish for.

Thank you.

MS. JUDGE: Thank you.

Number 82.

MR. KRONEWITTER: I hope the FAA will indeed hear this message that I have tonight. James Kronewitter, K R O N E W I T T E R.

This EA study is flawed in many ways. One way it fails to justify the impact of the deplanements. I notice our author talked about the impact of the people getting on the planes, but I assume these planes must come here empty, because they did not give us the information about deplanements, meaning a specific.

Second of all, this study failed to include the runoff that is being caused by the new runway that
was just finished for Boeing, the expanded runway. And the second terminal. He said that all he's covering is that small apron going over the grass of the old terminal that's over there. And, finally, he's not talked anything about the floodplain runoff that's going to come from the third runway. I know this was talked about for Sea-Tac. Well, obviously one runway is not going to be enough here at Paine Field. And with the increased air traffic, we're going to have a third runway.

Second of all, did talk about the impact, economic and otherwise. This airport was meant to be the general aviation airport for small planes and hobby enthusiasts. And that crowd is going to be kicked off this airfield, because the commercial traffic is going to come in here and take over this airfield and take it away from us.

I for one live in the Lake Serene Heights area, and Boeing's Dream Lifter comes over my house, and every time that plane comes over my house, my house shakes to the ground, and has scared my wife and family as they have come over and experienced this. So noise and this kind of air pollution from this jet wash is certainly impacting the environment
that's not been talked about in this study.

Next, this study fails to address the impact of
the new motel here on the north side of the field,
other airlines like Southwest Airlines who are
planning on coming in here.

And did you all forget that Disneyland just
asked to try and build a whole new park out here?
They're waiting for this Paine Field to come into
existence as a commercial airport, and then they're
going to be building a new Disneyland out in Monroe.
And we'll have additional traffic there.

We want to remember that once we get an airport
and commercial use, it's not going to be limited by
anything we can do or anything we're going to try
and do.

So this impact study also failed to take into
account Mukilteo Speedway, which on west side of the
airport is going to have terminal two, and the
Airport Way, which is already crowded, and both of
them are overloaded. Just look at any time, 3:30 in
the afternoon when Boeing goes off. Thank you very
much.

MS. JUDGE: I think we are on 83. 84. 85.
87.

MR. SALSMAN: Dave Salsman, S A L S M A N.
Mr. Dunkelberg and I have been looking over a microphone for about 22 to 25 years.

His reports are perfect. Unfortunately, they're based on FAA. FAA is not perfect. Can't criticize Mr. Dunkelberg. We can really criticize the FAA. They rely on DNL, 65 DNL. Totally useless way to gauge community impact. Absolutely says nothing of use to any person impacted by an airport. Single event noise levels, yeah. Now we start to talk. But DNL is useless.

FAA FAR's, my experience with those as an engineer, I get curious, why do things work the way they work. So I ask myself, is there something here in the FAR's that says they limit noise into an airport? So I went to look several years ago, many years ago. And I found an astonishing piece of mathematics. I've had some calculus. This stuff, looks like a dissertation of a buddy of mine who went to high school who got a doctorate in nuclear physics from Cal-Tech. Mathematics in his dissertation to get a doctorate from Cal-Tech looked much simpler than this stuff in the FAA document.

So I looked at it awhile. Said, what does it do? Can we simplify this? Some tricks I can make some sense out of this? And after a week or two
came to the conclusion that for one runway, they had set a standard of noise that would stop or limit aircraft landings at a point that was beyond separation that you could land airplanes 24 hours a day all day long. Their noise did nothing. They published this whole thing, and unless you had a five runway airport, their noise limitation did nothing. This is the kind of stuff the FAA does and their requirements for him to make a report.

So we can criticize, and people have done it here all night long. And to use a document based on the assumptions he was tasked with, to make a judgment of this type is the worst kind of government we can have. Absolutely the worst.

MS. JUDGE: Thank you, Mr. Salsman.

Number 88.

MS. WEI JIN: My name is Wei jin, W E I J I N, and I'm aircraft design engineer, and I'm also a project manager professional. I just stand down here from China one year.

So tonight I came here, I didn't plan to have some speak, but now I really want to say something from engineer perspective, and also from project of management.

First, from engineer to presentation, all the
people even have no high knowledge, but also can
find all the data, all the chatter, all the things,
like is not solid. Have no support, no. How you
can show your result is cracked.

Second, from the management view, I think our
Project Management Institute is in America. And the
PMP very powerful, I guess issue, in America. I
couldn't believe in America, in Seattle, in
Washington and this so big project for management,
big issue, and without our key stakeholder, the real
people, real life adding input in your presentation,
and then you can have your say in your result.

Your company, you said no significant impact.
people should ask how this question. And I really
wonder today other people support our information
really to even so many people surprise, they are
really prepared well and write down and bring up
here.

But I really wonder today, this type of hearing
is just a format, they have to follow some rule
according to the government, or they really want to
considering our key stakeholders, what's your
project going to cost you all, the stakeholders, the
benefits, the tax, the house, the securities, the
society, the school, all the people of your life.

And the risk is the benefits for this project.
And of the project, I think our stakeholder, we want
to know the whole picture. The whole project
overview. The whole project life cycle, not only
just to 2016. Thank you.

That you very much.

MS. JUDGE: Thank you. So we are now on 88.
89.

MR. BUCHALTER: Charlie Buchalter, B U C H A L T
E R. I live about halfway between Meadowdale High
and Perrinville. But possibly, more to the point, I
own a business that is not too far from the airport,
about a mile south of the runway. I'm not against
commerce, transportation, I love it. I fly out of
Sea-Tac occasionally, too. But I am against
community impact, negative community impact. And I
don't see any redeeming value to speak of of the
Paine Field expansion and changing certification
type.

And I have, as far as the 65 DNL concept, I
don't get it. Yeah, I understand the graph. The
line basically follows Mukilteo Speedway. Like I
said, my business is about a mile from the end of
the runway, actually just a little more. My office
has no windows on an exterior wall, well sheltered within a big building. Just this morning my desk shook. A mile outside 65 DNL line. This is not an isolated incident. It happens on a routine basis.

If they expand these flights more, we're not talking about Cessnas taking off, we're talking about much larger airplanes. I don't see any way it can't have a very negative impact.

And as a business owner I'm grateful that I lease the space, not own it, because I'll be moving. When I have to tell people, my customers, please wait, I can't hear what you're saying because there's an airplane going overhead. That's impact.

You know, if this is such a great idea, why is every community I've heard of in the vicinity saying, Don't do it? Are they against economic development?

I'm involved with the City of Lynnwood. They want economic development. I just don't see where the benefit is.

MS. JUDGE: Thank you.

Number 90. 91. 92. 93. 94. 95

MR. WEST: Loren West, L O R E N, W E S T.

I have two issues with this Environmental Assessment. First is that I believe it's flawed.
You have not addressed the economic impact of my type of company. I'm a CEO of a software company, and I believe I represent a new model in software development, anyway, where three developers are live in the Mukilteo area, we work out of our homes. We chose the Mukilteo area because of its beauty, and we will choose to leave Mukilteo if commercial traffic is approved. And I don't believe the economic impact of that has been addressed.

Secondly, I want to thank you for your work, and I want to thank you for every one of those slides that mentioned that there was no impact. Every slide says no impact. Has a very profound impact on our vision of you and the honesty of that report.

MS. JUDGE: Folks, please keep your applause to yourselves. Please.

MR. WEST: So I believe the shoddiness of that report shows, and I want to thank you for doing such a terrible job on that report, because it has empowered an entire community. We're now very organized, very upset at the way you've done business, and we will fight this. Expect it. Thank you.

MS. JUDGE: Thank you, Mr. West.

Number 96.
MR. DOUGH: Don Gough, G O U G H, I'm the mayor of the City of Lynnwood and I'm hanging in there with the rest of you.

I just want to mention that the City of Lynnwood in 1992 supported the MRD, legal permits legislative body, and from the mayor, because they wanted to support the long term solution of the MRD. It's not about saying -- it's about not going beyond the role identified in the MRD.

And it's very unfortunate the FAA doesn't believe that somehow working out those issues in a long term, early on is a good idea. Apparently not.

I've been the mayor for the last four years. In 2008 we reaffirmed our commitment as a city seven-zero unanimously. And for those people that think it's just a bunch of things, we had everybody sign personally, the elected officials, that their signature and their commitment is there.

To let you know personally, I'm a pilot. I've flown in and out of Paine Field. My house is literally under the northbound in route and the southbound out route. And I hear the airplanes. I'm a pilot, and I'll tell you right now, I hear them more than anybody does because I relate to that particular sound. And it really gets unnerving at
times.

Plus, my city hall happens to be under the same flight path. We do EIS's in the city all the time. This report -- I'm an executive, I would cancel this contract. Just to let you know. Because this is just absolutely not realistic.

The first point is highly deficient in one particular thing. You know, the teacher from Beverly Park Elementary School that comes to me and explains that her class is interrupted because of aircraft going over the top points out the fallacy of the issue. There is nothing that describes the aircraft -- the impacts of an aircraft overhead causing disruption of classrooms. That needs to be taken care of. Needs to be addressed in your final report. And it will be interesting to see what the answer is. There's no criteria that actually measures these kinds of impact. And somehow that noise by the way, outside the 65 DNL line, you notice in the Beverly Park.

Point number two, the deficiency. If you're going to allow an airport to expand almost to a blank check that you can run the biggest aircraft that's scheduled, unscheduled aircraft, we read all the things on that, there are no limits on the scope...
of it. There's no mitigation even suggested. And if you were in my city and you wanted to come in and put in a development and whatnot, we would know the net available capacity of the streets, the water, the sewer systems all around it so that you had a context and a benchmark against which to measure, not just that impact, but how that works down the road ultimately.

This is an absurd report. And I understand the criteria. I understand why you might have to do this. But I'm waiting for the SEPA process.

Let me speak to the public here. The SEPA process is State Environment Protection Act. You must continue to come to these hearings. You must continue to make these comments. You must continue to make the record. Because I, as an elected official, but as an elected official, if you don't make the record, then we can't make the decision you would like us to do. Send us all the letters you want, but if you don't come and make the record, we can't make that decision. We're waiting for SEPA. You will see us there again.

This report is void of common sense. And let's see, I want to say one other thing.

MS. JUDGE: You have used three minutes.
MR. GOUGH: That concludes.

MS. JUDGE: Thank you, Mr. Mayor.

Number 97. 98. 99. 100. 101

MR. SULLIVAN: John Sullivan, S U L L I V A N, resident of Mukilteo for just over 20 years. Mukilteo is one of the top ten most livable small towns in America, according to Money magazine. If this goes through, we'll be one of the ten worst small towns in America.

I served seven years in Mukilteo City Planning Commission. Spent five years on the Mukilteo City Council. And, by the way, I'm also an attorney. I got involved with the planning commission because, gosh, 20 years ago, you know, it's deja vu all over again. We were going through this 20 years ago. Five years ago, roughly five years ago when the county executive was looking to come up with some plans for expansion, we had a huge public hearing. I was on the council at that time, and I asked Mr. Reardon, and Gary Nelson, who's the president of the county council, whether they in fact still opposed the expansion of Paine Field for commercial aviation. They swore they did. I asked if they would uphold the MRD. Oh, yes, we will.

So I said, Will you put your money where your
mouth is? Everybody argues whether the MRD is legally binding. Will you sign? You, the council, approve and executive sign an interlocal agreement with the City of Mukilteo that you will not support any expansion of aviation? Oh, sure. We'll do that. We'll do that.

So they form a committee and, guess what, nothing happened. They speak with forked tongues.

Mr. Waggoner, I don't know if you're still here, airport director, I'm sure this would look very good on your resume and you would like to be king of a big airport, but it's not your decision. And, frankly, everything you told us in the past has been a lie, and I don't know why it would change.

The reason I bring all this up is because this whole process is a sham. Someone pointed out earlier, the only thing they're going to listen to is if you can say, this little number on this page is wrong because of this data somewhere else. They're going to talk about how many angels can dance on the head of a pin, but they're not going to care what you think. It is a political issue to get this stuff, as was said before, you need to write your elected officials, you need to go through the SEPA process, you need to fight, you need to fight
And I'll tell you, support SOC. I do. They have got a good war chest. City of Mukilteo has got a good war chest. If they continue to persist in this, it's going to go to litigation.

Last comment. Evidence of what the sham is. This whole hearing has been, with all due respect, when somebody starts off by saying, If you don't follow what I say, I'm going to get very angry at you, and then start threatening people at the beginning. It's highly unprofessional. Highly unprofessional.

MS. JUDGE: Number 103. 104.

MR. MALLOUK: Bechara Mallouk, M A L L O U K. I live here in the City of Mukilteo. And from where you stand, from my our door straight line, only one, which is less than one mile there's 3,300 kids. Just about as wide as the runway, not talking about anything else. You're going to get these airplanes that's full of passengers and fuel over fly these kids. I'm excluding any other schools. Just the straight line from here to there.

Basic one avenue square you get more mass, more speed, more energy. I would like to know, who's in the FAA is going to go stand one of these airplanes,
like Q400 that went down back east, in one of these schools and tell the kids, or tell the moms and dads of these kids that we see. There's 16,000 kids that are impacted by smoke, noise, other issues.

From the perspective of the facilities and so forth, from an airline perspective, Sea-Tac has much better facility. You can taxi for takeoff at 300. Here, 12 hundred. You got six runways. You got at least four of them cat three capable. In here it's only cat one category approved approach that you can do. So it's very -- it's much more beneficial there.

If the government is concerned about us, they can provide us some transportation, reliable public transportation that can go to Sea-Tac. So whether I'm going to go to Spokane or Moscow, I can go to one place.

You should take a look at I-5 heading south in the morning and evening and see what kind of congestion we have.

The thing that really bothers me and the presentation that you did is you telling me you're going to put one billion pounds of CO2, let alone the other stuff.

The value of my house is going to depreciate.
It's going to increase crime and traffic, and that's only bad. How you have that face. I don't know. That's just beyond me. Thanks

MS. JUDGE: Thank you.

I think we're at 104. 105. 106. 107. 108. 109. 110.

MR. DESTRO: Chris Destro. 110. I made it.

I've been here for awhile. A lot of the messages I've heard tonight are common. What I'm going to read, I'm going to read my editorial that I wrote to the Beacon.

Before I read it, I want to let everybody know I'm qualified as a traveler. I've logged over one-and-a-half million miles in my life. I actually came from the airport, changed in my car. My wife laughed at me, but get out of my work clothes.

Next week I'll be in St. Louis, Kansas City, and DFW. But I don't mind going out of Sea-Tac, and that's the point. I don't want an airline at Paine Field.

Back to what I want to talk about here, though, from my editorial. When everybody that's thinking about the business benefit of what could happen by putting in expansion. After reading remarks regarding the commercial expansion today, I found it
prudent to spotlight the critical consideration during this hotly contested issue. Boeing would have to share Paine Field with these proposed airlines. What happens if it concludes one day their daily operations are no longer running in an effective schedule, thus forcing research into other options?

Keep in mind, once the go-ahead is given to commercial expansion, limitations on the number of flights are not applicable. These are FAA guidelines. I would surmise most business owners would agree, if something is detrimental to your process, you look to other alternatives. What if the other alternative is to find another home for their testing?

You presume commercial expansion would be part of a synergistic and positive relationship forever. Why would we want to push the envelope? If Boeing one day decided to park Paine operations based on competition and commercial traffic, how would anyone feel if the proposed expansion in any way pushed out one of the largest and most important companies ever located in the State of Washington?

Lastly, I wrote a comment in the Beacon last week to the editors.
A lot of business owners would benefit immensely from expanded operations. Does this hold true if Boeing's operations are challenged in the future? They claim the local economy would benefit from commercial expansion is suspect at best. Flights are being proposed are daily trips to Vegas, Spokane, and Portland. Typically local travelers traveling to any of these three cities would not require overnight stays in local hotels, therefore mitigating any final -- therefore mitigating any perceived financial benefit in the form of locally rented hotel rooms, restaurants, shopping, entertainment. I ask, benefiting what business?

Lastly, an internet travel search compared travel from Bellingham to Seattle and Portland. Flights from Bellingham were consistently more expensive.

Now I can't say that's going to be the same price for flights going out of Paine Field, but I wanted to do a comparison. I urge anybody out there to do the same.

I'm running low on time. I've heard a few other people say get out, not just talk about these things, write letters. I've already contacted the governor, written letters to Senator Murray. Make
Sure you do the same if you're as passionate about this as I am.

**MS. JUDGE:** Number 111.

Is there anybody else? Come on down.

**MR. SMITH:** Robert Graham Smith. I live in Mukilteo, and I also serve on the Parks and Recreation Commission for the City of Mukilteo.

And after seeing this report tonight, I'm very concerned about, we purchased a park last year, about nine years ago, the community garden is about 500 yards from the end of the runway. And in that community garden, we just doubled the size of it to grow food for our local food bank. And I'm very, very concerned when I hear about VOC's and particulate matter falling from these planes. And seeing that there is an increase, that this study would be redone looking at what would be the affect of those particulate matter and VOC's landing on food we're growing here in the garden, and to be donated to the food bank here, I guess fall into a couple of categories of study.

So I guess, yeah, I'm pleading with FAA to take that into consideration and to look at the impact that the increase will have on food and in the garden.
MS. JUDGE: Thank you.

All right. Seeing none. Adjourn our meeting.

Thank you for your patience. It's been a long night. We really appreciate you coming.

(End of the hearing.)
TRANSCRIPT 3 – JANUARY 21, 2010

Please note: Responses are ordered by speaking order in the hearing.

Daniel Harris

Thank you for your comments. Please see general responses: 1-5 (Mitigation), 6-1 (Significance of Project Effects), 7-7 (Noise impacts on schools).

Christina Bandaragoda

Thank you for your comments. Please see general responses: 1-6 (What are the FAA and County roles in this EA and has a decision been made to move forward?), 1-8 (Adequacy of FAA guidance and use of FAA guidance), 1-10 (Scope of the EA analysis for future operations and passengers), 1-11 (Flawed/inadequate/biased EA), 3-14 (What actions will require additional environmental review?), 5-6 (Sources of existing air pollution), 6-1 (Significance of Project Effects), 10-2 (Air quality conformity), 10-3 (Outdated Model: EDMS), and 10-5 (Question regarding the analysis of PM10 and PM2.5).

William Wagner

Thank you for your comments. Please see general response: 2-2 (Boeing reaction to the Proposed Project and the effect of the Project on Boeing).

Mr. Henderson

Thank you for your comments. Please see general responses: 1-5 (Mitigation) and 7-11 (Call for noise curfew/activity restrictions).

Mike Moore

Thank you for your comments. Please see general responses: 1-1 (Why can’t the County limit or restrict operations?), 1-3 (An independent investigation is needed because the FAA pushed the County to approve the terminal), 1-5 (Mitigation), 1-6 (That are the FAA and County roles in this EA and has a decision been made to move forward?), 1-10 (Scope of the EA analysis for future operations and passengers), 1-12 (Adequacy of public involvement and release of the Draft EA and Public Hearings), 1-13 (Additional study should be conducted), 3-14 (What actions will require additional environmental review?), and 6-1 (Significance of Project Effects). Also, please see the following individual response to comments.

Greg Hauth

Thank you for your comments. Please see general responses: 1-3 (An independent investigation is needed because the FAA pushed the County to approve the terminal), 1-6 (What are the FAA and County roles in this EA and has a decision been made to move forward?), 1-8 (Adequacy of FAA guidance and use of FAA guidance), 1-3 (Additional study should be conducted), 3-2 (What are the effects of the Proposed Project on general aviation?), 3-5 (Why was 2016 selected...
as the future year?), 3-10 (What is the capacity of the Airport?), 3-13 (What is a Class I Airport? Explanation of Federal Aviation Regulations (FAR) Part 139), and 6-1 (Significance of Project Effects).

**Jim Langus**

Thank you for your comments.

**Frank Nichols**

Thank you for your comments. Please see general response: 1-10 (Scope of the EA analysis for future operations and passengers), 1-13 (Additional study should be conducted), and 3-14 (What actions will require additional environmental review?).

**John Wightman**

Thank you for your comments. Please see general response: 1-6 (What are the FAA and County roles in this EA and has a decision been made to move forward?).

**Cathy Reese**

Thank you for your comments. Please see general responses: 1-3 (An independent investigation is needed because the FAA pushed the County to approve the terminal), 1-9 (Roles of the Airport/Consultant and their qualifications), 1-11 (Flawed/inadequate/biased EA), and 3-5 (Why was 2016 selected as the future year?).

**Harold Quinby**

Thank you for your comments. Please see general responses: 5-1 (Existing aircraft noise concerns), 5-2 (Current curfew is broken), 7-3 (Noise analysis methodology), 7-13 (What is the effect of the proposed project on parks?), 7-14 (What is the Airport Influence Area), 10-4 (Would there be an increase in fuel dump/fuel smell/residue?), and 11-1 (What is the impact on wildlife?). Also, please see the following individual response to comments.

**Don Doran**

Thank you for your comments. Please see general responses: 1-9 (Roles of the Airport/Consultant and their qualifications), 3-1 (What is the purpose and need for the action or project?), 3-5 (Why was 2016 selected as the future year?), and 3-13 (What is a Class I Airport? Explanation of Federal Aviation Regulations (FAR) Part 139).

**Pamela Spampani**

Thank you for your comments. Please see general responses: 3-10 (What is the capacity of the Airport?), 3-11 (What is the capacity of the terminal?), 3-12 (What is the relationship of the two terminals?), 7-5 (Proposed commercial fleet mix), 7-7 (Noise impacts on schools), 9-8 (What
are the health and quality of life effects associated with the project?), and 11-9 (How does this project compare to the commercial operations at Bellingham Airport?).

**Richard Emery**

Thank you for your comments. Please see general responses: 1-1 (Why can’t the County limit or restrict operations?), 1-8 (Adequacy of FA guidance and use of FAA guidance), 1-10 (Scope of the EA analysis for future operations and passengers), 1-11 (Flawed/inadequate/biased EA), 3-5 (Why was 2016 selected as the future year?), 5-5 (Study Areas), 7-1 (Use of DNL), 7-3 (Noise analysis methodology), 7-5 (Proposed commercial fleet mix), 7-7 (Noise impacts on schools), and 11-1 (What is the impact on wildlife?).

**Ted Hikel**

Thank you for your comments. Please see general responses: 1-5 (Mitigation), 1-10 (Scope of the EA analysis for future operations and passengers), 1-13 (Additional study should be conducted), 2-1 (MRD document), 3-5 (Why was 2016 selected as the future year?), 3-14 (What actions will require additional environmental review?), 4-6 (What does the term “Preferred Alternative” mean?), and 6-1 (Significance of Project Effects).

**Jackie Locke**

Thank you for your comments. Please see general responses: 1-5 (Mitigation), 3-3 (Concerns that only half of the activity was considered), 4-1 (Alternative airports should be used), and 9-1 (What is the impact upon property values?).

**Roy Eastman**

Thank you for your comments. Please see general responses: 1-12 (Adequacy of public involvement and release of the Draft EA and Public Hearings), 7-1 (Use of DNL), 7-6 (What are the existing and future noise impacts?), and 7-7 (Noise impacts on schools).

**Margaret Holland**

Thank you for your comments. Please see general responses: 2-2 (Boeing reaction to the Proposed Project and effect of the Project on Boeing), 3-5 (Why was 2016 selected as the future year?), 5-5 (Study Areas), 7-7 (Noise impacts on schools), and 11-9 (How does this project compare to the commercial operations at Bellingham Airport?). Also, please see the following individual response to comments.

**Aerial Photo Is Not Current**

In response to comments that the aerial photo is not current, the aerial photo used in the Final EA was updated to a 2010 photo. While it is possible that some changes to land use have occurred since 2010, these land uses are outside of the 65 Day-Night Noise Level (DNL) contour which exists almost exclusively on airport property. If a substantial portion of the 65 DNL contour left
airport property and there were land use compatibility questions or concerns, then an aerial or
ground survey would have been conducted to determine up-to-date housing numbers.

**Does not Include Licensed Daycare Facilities**

In response to comments regarding licensed daycare facilities, based on the Federal Aviation
Regulations (FAR) Part 150 Land Use Compatibility guidelines, Day-care facilities are not
compatible with aircraft noise above 65 Day-Night Noise Level (DNL). However, since there
are no day-care facilities within the existing or future 65 DNL noise contours with or without the
proposed project, no significant noise impacts would occur and no noise mitigation would be
required.

_Gary Haakenson_

Thank you for your comments. Please see general responses: 1-6 (What are the FAA and County
roles in this EA and has a decision been made to move forward?), 1-10 (Scope of the EA
analysis for future operations and passengers), 1-11 (Flawed/inadequate/biased EA), and 1-3
(Additional study should be conducted).

_Joe Marine_

Thank you for your comments. Please see general responses: 2-1 (MRD document), 2-2 (Boeing
reaction to the Proposed Project and effect of the Project on Boeing), 3-1 (What is the purpose
and need for the action or project?), 3-5 (Why was 2016 selected as the future year?), 4-1
(Alternative airports should be used), 4-4 (Relationship between capacity at other airports and
Paine Field), and 6-1 (Significance of Project Effects).

_Randy Lord_

Thank you for your comments. Please see general responses: 1-6 (What are the FAA and
County roles in this EA and has a decision been made to move forward?), 1-12 (Adequacy of
public involvement and release of the Draft EA and Public Hearings), 7-1 (Use of DNL), and 11-
8 (Cumulative impacts).

_Hyon Pak_

Thank you for your comments. Please see general responses: 1-1 (Why can’t the County limit or
restrict operations?), 1-11 (Flawed/inadequate/biased EA), 3-1 (What is the purpose and need for
the action or project?), 3-5 (Why was 2016 selected as the future year?), 3-10 (What is the
capacity of the Airport?), 3-14 (What actions will require additional environmental review?), 7-1
(Use of DNL), and 11-8 (Cumulative impacts).
Kelly Davis

Thank you for your comments. Please see general responses: 1-11 (Flawed/inadequate/biased EA), 3-5 (Why was 2016 selected as the future year?), 5-1 (Existing aircraft noise concerns), 6-1 (Significance of Project Effects), 7-7 (Noise impacts on schools), and 8-1 (Traffic analysis).

Ms. Vanderwielien

Thank you for your comments. Please see general responses: 1-13 (Additional study should be conducted), 1-15 (EA did not reflect the opposition of the community), 3-10 (What is the capacity of the Airport?), 6-1 (Significance of Project Effects), 7-7 (Noise impacts on schools), 9-2 (Indirect/Induced traffic effects), 9-8 (What are the health and quality of life effects associated with the project?), 10-2 (Air quality conformity), and 11-1 (What is the impact on wildlife?). Also, please see the following individual response to comments.

Cultural Resources

In response to comments regarding cultural resources, cultural resources are discussed in the Environmental Assessment (EA) starting on page D.15. This resource category relates to historical, architectural, archaeological, and cultural resources of importance within the Area of Potential Effect (APE) that might be impacted by the Preferred Alternative. Because the APE is located on entirely pre-disturbed land, and there are no historic or cultural sites within the APE, the Federal Aviation Administration (FAA) has made a determination of “no effect.” Additionally, the FAA has coordinated with local tribes including the Stillquaquamish Reservation, Sauk-Suiattle Indian Reservation and the Tulalip Tribe and no significant concerns were raised.

The FAA provided additional information to the Washington Department of Archeology & Historic Preservation in response the agency’s September 16, 2009 letter. After reviewing the additional information the Department of Archaeology & Historic Preservation concurred with the determination of no affect. This correspondence can be found in Appendix J of the EA.

An Unidentified Man

Thank you for your comments. Please see general responses: 1-6 (What are the FAA and County roles in this EA and has a decision been made to move forward?), 2-2 (Boeing reaction to the Proposed Project and effect of the Project on Boeing), 5-1 (Existing aircraft noise concerns), 7-7 (Noise impact on schools), and 9-4 (E.O. 10345 Children’s Health and Safety impacts analysis).

Greg Abbey

Thank you for your comments. Please see general responses: 1-6 (What are the FAA and County roles in this EA and has a decision been made to move forward?), and 1-12 (Adequacy of public involvement and release of the Draft EA and Public Hearings).
Mark Shurtleff

Thank you for your comments. Please see general responses: 3-1 (What is the purpose and need for the action or project?), 3-5 (Why was 2016 selected as the future year?), 3-10 (What is the capacity of the Airport?), and 11-9 (How does this project compare to the commercial operations at Bellingham Airport?). Also, please see the following individual response to comments.

Southwest Proposed to Operate at PAE

In response to comments regarding Southwest’s interest in operating at Paine Field, Southwest Airlines briefly considered service out of King County International Airport/Boeing Field five years ago. There have been no proposals by Southwest Airlines to serve Paine Field. Neither the County nor the Federal Aviation Administration (FAA) has received any indication of interest to provide passenger service beyond that proposed by Allegiant Air and Horizon Air.

Mike Suhara

Thank you for your comments. Please see general responses: 1-5 (Mitigation), 1-10 (Scope of the EA analysis for future operations and passengers), 1-13 (Additional study should be conducted), 3-5 (Why was 2016 selected as the future year?), 3-14 (What actions will require additional environmental review?), and 8-1 (Traffic analysis). Also, please see the following individual response to comments.

Project Timeline

In response to comments regarding the project timeline, if the project received environmental approval in 2012 and construction in early 2013, it is possible that commercial service could be available at Paine Field as early as summer of 2013.

Scott Casselman

Thank you for your comments. Please see general responses: 1-2 (What is the Centennial Rule? Does it apply here?), 2-2 (Boeing reaction to the Proposed Project and effect of the Project on Boeing), 6-4 (What are the quality of life impacts?), and 8-1 (Traffic Analysis).

Jane Casselman

Thank you for your comments. Please see general responses: 1-2 (What is the Centennial Rule? Does it apply here?), 1-10 (Scope of the EA analysis for future operations and passengers), 1-13 (Additional study should be conducted), and 3-14 (What actions will require additional environmental review?).

Victor Coupez

Thank you for your comments. Please see general responses: 1-10 (Scope of the EA analysis for future operations and passengers), 1-11 (Flawed/inadequate/biased EA), 1-13 (Additional study
should be conducted), 3-5 (Why was 2016 selected as the future year?), 3-12 (What is the relationship of the two terminals?), 3-14 (What actions will require additional environmental review?), 7-7 (Noise impacts on schools), 7-8 (Where are the locations of the schools on the noise map?), and 9-4 (E.O. 10345 Children’s Health and Safety impacts analysis). Also, please see the following individual response to comments.

**No Action and How it Differs from Existing**

In response to comments regarding the difference between the No Action Alternative and the existing conditions, the Environmental Assessment (EA) clearly and concisely describes the No Action Alternative on Pages B.2 and B.3. The EA also notes that the alternative described as “use of other area airports” by both Horizon Air and Allegiant Air is reflected in the No Action Alternative because Horizon Air already provides scheduled commercial air service at Sea-Tac and Bellingham and Allegiant Air already offers scheduled commercial air service at Bellingham. The No Action Alternative is essentially the existing conditions alternative. It differs from the existing condition in future years, as by 2018 it is anticipated that other activity levels at the Airport could increase regardless of whether or not the proposed actions are implemented.

**Dave Emerson**

Thank you for your comments. Please see general responses: 6-3 (What are the project benefits?), 9-1 (What is the impact upon property values?), and 9-7 (Project will bring in lower income people and low paying jobs). Also, please see the following individual response to comments.

**Noise Monitors**

In response to comments regarding noise monitors, the Airport currently has a noise monitoring system in place, called AIRSCENE. These monitors are not required at airports, but were put into place as the result of a Part 150 Noise Compatibility Study conducted voluntarily by Snohomish County. The locations of the monitors were determined to monitor the noise at a wide variety of locations and communities and include a mobile monitor to spot monitor locations. Monitor One is located 9,500 feet north of the Airport in Mukilteo. Monitor Two is located 6,500 feet west of the airport in Harbour Point. Monitor Three is located 8,500 feet south of the Airport near Lake Serene. Monitor Four is the mobile monitor and is mounted in the Airport’s noise monitoring trailer and is used for spot monitoring throughout the community.

**Harish Nelson**

Thank you for your comments. Please see general responses: 6-4 (What are the quality of life impacts?), and 9-6 (What is the impact of the project on crime?).
Jennifer Gregerson

Thank you for your comments. Please see general responses: 1-10 (Scope of the EA analysis for future operations and passengers), 1-13 (Additional study should be conducted), 3-5 (Why was 2016 selected as the future year?), 3-10 (What is the capacity of the Airport?), 3-14 (What actions will require additional environmental review?), and 4-1 (Alternative airports should be used).

Mark Fussell

Thank you for your comments. Please see general responses: 7-9 (What are the health effects of noise?), 11-1 (What is the impact on wildlife?), 11-8 (Cumulative impacts), and 11-10 (Water quality impacts).

Bill Jenness

Thank you for your comments. Please see general responses: 1-6 (What are the FAA and County roles in this EA and has a decision been made to move forward), 1-10 (Scope of the EA analysis for future operations and passengers), 1-11 (Flawed/inadequate/biased EA), 3-1 (What is the purpose and need for the action or project?), 4-5 (Other modes of transportation may be better alternatives), 8-1 (Traffic analysis), 9-6 (What is the impact of the project on crime?), and 11-5 (What are the health impacts compared to safety?). Also, please see the following individual response to comments.

Plans for Mass Transit in the Area

In response to comments about the plans for mass transit in the area, a Transit Element is not a required element of the NEPA. The project is not anticipated to have a significant impact on transit services in the area. Currently no transit agency uses the transit stop at the Airport terminal building. The transit stops at the 100th Street SW terminal entrance and Airport Road intersection are serviced by Everett Transit (ET) routes 12 and 14, and Community Transit (CT) route 952. Substantial transit service is available at the transit stops at the 94th Street SW and Airport Road intersection where ET routes 3, 12, 14 and 70, as well as CT routes 227, 247, 277 and 280 stop. King County Metro provides service in the area along Airport Road with a stop at Kasch Park Road. Service along Airport Road at the access, 100th Street SW. However, King County Metro, Community Transit and Everett Transit provide service in the area along 94th Street SW and Kasch Park Road. King County Metro provides service via Route 952. Community Transit provides service via Routes 227, 247 and 277. Everett Transit provides service via Routes 3, 12, 14 and 70. The nearest transit service is along 94th Street SW at Airport Road. This route serves four routes from Community Transit (routes 227, 247, 277 and 280) and two routes from Everett Transit (routes 3 and 70). King County Metro, Community Transit and Everett Transit constantly evaluate routes and could decide to add service at the terminal transit stop or increase service at the 100th street stops along Airport Road if there is sufficient ridership.
However, there is an existing bus pull-out on the west side of Airport Road south of 100th Street SW. There is sidewalk connectivity between the 100th Street SW at Airport Road intersection transit stops and the terminal is pull-out and the terminal, which is approximately 1/3 0.33 mile walking distance as well as along the full length of Airport Road. There will be also adequate facilities along the frontage of the terminal to provide a turn-around route for bus service if a future route serving the terminal is warranted as part of continuing review by the transit agencies of the service provided by Community Transit and Everett Transit.

The project has provided a Transportation Demand Management site plan in accordance with Snohomish County Code 66B26B. There will be are bike racks, walkways and connectivity to the transit bus stops pull outs on Airport Road. As an employer within Snohomish County, the project will also be subject to the standard Commute Trip Reduction requirements of any similar size employment center.

Ray Boyer

Thank you for your comments. Please see general responses: 1-2 (What is the Centennial Rule? Does it apply here?), 1-10 (Scope of the EA analysis for future operations and passengers), 1-11 (Flawed/inadequate/biased EA), 1-13 (Additional study should be conducted), 2-2 (Boeing reaction to the Proposed Project and effect of the Project on Boeing), 3-5 (Why was 2016 selected as the future year?), 3-14 (What actions will require additional environmental review?), 6-1 (Significance of Project Effect), 6-4 (What are the quality of life impacts?), 7-7 (Noise impacts on schools), 9-1 (What is the impact upon property values?), 9-4 (E.O. 10345 Children’s Health and Safety impacts analysis), 9-6 (What is the impact of the project on crime?), and 9-7 (Project will bring in lower income people and low paying jobs).

Bill Gregerson

Thank you for your comments. Please see general responses: 2-1 (MRD document), 7-7 (Noise impacts on schools), 9-8 (What are the health and quality of life effects associated with the project?), and 10-5 (Question regarding the analysis of PM10 and PM2.5).

Donald Saul

Thank you for your comments. Please see general responses: 1-1 (Why can’t the County limit or restrict operations?), 1-10 (Scope of the EA for future operations and passengers), 1-13 (Additional study should be conducted), 3-5 (Why was 2016 selected as the future year?), 3-12 (What is the relationship of the two terminals?), 3-14 (What actions will require additional environmental review?), 5-1 (Existing aircraft noise concerns), 6-4 (What are the quality of life impacts?), 8-1 (Traffic analysis), and 10-2 (Air quality conformity).

Laura Dangel

Thank you for your comments. Please see general response: 6-3 (What are the project benefits?).
Tim Adamson

Thank you for your comments.

Brainard Lee

Thank you for your comments.

Wanda Page

Thank you for your comments. Please see general responses: 8-1 (Traffic analysis) and 9-5 (What is the impact of the project on crime?).

Carlin McKinley

Thank you for your comments. Please see general responses: 9-1 (What is the impact upon property values?), 10-2 (Air quality conformity), 10-4 (Would there be an increase in fuel dump/fuel smell/residue?), and 10-5 (Question regarding the analysis of PM10 and PM2.5).

Ron Hine

Thank you for your comments. Please see general responses: 1-1 (Why can’t the County limit or restrict operations?), 2-1 (MRD document), 3-1 (What is the purpose and need for the action or project?), 3-5 (Why was 2016 selected as the future year?), 3-10 (What is the capacity of the airport?), 9-1 (What is the impact upon property values?), and 9-6 (What is the impact of the project on crime?).

Paul Luczyk

Thank you for your comments.

Dan Park

Thank you for your comments. Please see general responses: 3-1 (What is the purpose and need for the action or project?), 9-1 (What is the impact upon property values?), and 11-9 (How does this project compare to the commercial operations at Bellingham Airport?). Also, please see the following individual response to comments.

Michelle Robles

Thank you for your comments. Please see general responses: 1-5 (Mitigation), 2-1 (MRD document), 3-5 (Why was 2016 selected as the future year?), 3-10 (What is the capacity of the airport?), 5-1 (Existing aircraft noise concerns), 11-5 (What are the health impacts compared to safety?), and 11-7 (Security: terrorist attack).

Melody Boaz
Thank you for your comments. Please see general responses: 1-6 (What are the FAA and County roles in this EA and has a decision been made to move forward?), 3-5 (Why was 2016 selected as the future year?), 7-5 (Proposed commercial fleet mix), 8-1 (Traffic analysis), and 9-3 (Socioeconomic impacts). Also, please see the following individual response to comments.

**Fully Loaded Aircraft Make More Noise**

In response to the comment on noise levels of fully loaded aircraft, The Integrated Noise Model accounts for noise levels of aircraft based on the stage length assigned to the aircraft. A stage length represents the distance travelled by that flight. INM inputs included stage length appropriate for flight distances proposed by the Airlines.

In response to the comment about the Q400 being a particularly noisy prop plane, the Bombardier website states that the Q400 nextgen turboprop is one of the quietest aircraft flying today. Bombardier states that it is 15 db quieter than the stringent ICAO chapter IV noise standard.

http://q400nextgen.com/en/#/q400/environment/noisereduction/

Alice Hudec

Thank you for your comments. Please see general responses: 3-5 (Why was 2016 selected as the future year?), 5-1 (Existing aircraft noise concerns), 7-10 (What potential exists for a project related increase in vibrations?), 10-4 (Would there be an increase in fuel dump/fuel smell/residue?), and 11-1 (What is the impact on wildlife?).

Greg Tisdel

Thank you for your comments.

Victoria Callfas

Thank you for your comments. Please see general responses: 1-5 (Mitigation), 2-1 (MRD document), 2-2 (Boeing reaction to the Proposed Project and effect of the Project on Boeing), 3-5 (Why was 2016 selected as the future year?), 3-7 (Parking capacity), 3-10 (What is the capacity of the Airport?), 3-11 (What is the capacity of the terminal?), 3-12 (What is the relationship of the two terminals?), 6-1 (Significance of Project Effects), 7-3 (Noise analysis methodology), 7-7 (Noise impacts on schools), 8-1 (Traffic analysis), and 10-2 (Air quality conformity).

James Kronewitter

Thank you for your comments. Please see general responses: 1-11 (Flawed/inadequate/biased EA), 3-2 (What are the effects of the Proposed Project on general aviation?), 3-5 (Why was 2016 selected as the future year?), 3-11 (What is the capacity of the terminal?), 3-14 (What actions will require additional environmental review?), 5-1 (Existing aircraft noise concerns), 5-4 (Existing traffic), 6-1 (Significance of Project Effects), 7-10 (What potential exists for project related increase in vibrations?), 9-6 (What is the impact of the project on crime?), 10-2 (Air
quality conformity), and 11-10 (Water quality impacts). Also, please see the following individual response to comments.

**Planned Disneyland in Monroe**

In response to comments regarding a planned Disneyland in the City of Monroe, the County owns the Evergreen State Fairgrounds in Monroe. The County, while seeking to improve the infrastructure of the fairgrounds has no plans for a Disney park.

**Which Runway will the Airlines Use?**

In response to a question of which runway will be used for commercial traffic, of the three runways at Paine Field, the only runway expected to be used by the air carriers is the main runway, Runway 16R/34L. Runways 16L/34R and 11/29 are not designed to accommodate large air carrier type aircraft.

**Southwest Proposed to Operate at PAE**

In response to comments regarding Southwest’s interest in operating at Paine Field, Southwest Airlines briefly considered service out of King County International Airport/Boeing Field five years ago. There have been no proposals by Southwest Airlines to serve Paine Field. Neither the County nor the Federal Aviation Administration (FAA) has received any indication of interest to provide passenger service beyond that proposed by Allegiant Air and Horizon Air.

Dave Salsman

Thank you for your comments. Please see general response: 7-1 (Use of DNL).

Wei Jin

Thank you for your comments. Please see general responses: 1-6 (What are the FAA and County roles in this EA and has a decision been made to move forward?), 1-12 (Adequacy of public involvement and release of the Draft EA and Public Hearings), 3-5 (Why was 2016 selected as the future year?), and 6-1 (Significance of Project Effects).

Charlie Buchalter

Thank you for your comments. Please see general responses: 3-13 (What is a Class I Airport? Explanation of Federal Aviation Regulations (FAR) Part 139), 5-1 (Existing aircraft noise concerns), 6-1 (Significance of Project Effects), 6-3 (What are the project benefits?), 7-1 (Use of DNL), and 7-10 (What potential exists for a project related increase in vibrations?).

Loren West

Thank you for your comments. Please see general responses: 1-11 (Flawed/inadequate/biased EA), 6-1 (Significance of Project Effects), and 9-3 (Socioeconomic Impacts). Also, please see the following individual response to comments.
**Noise Monitors**

In response to comments regarding noise monitors, the Airport currently has a noise monitoring system in place, called AIRSCENE. These monitors are not required at airports, but were put into place as the result of a Part 150 Noise Compatibility Study conducted voluntarily by Snohomish County. The locations of the monitors were determined to monitor the noise at a wide variety of locations and communities and include a mobile monitor to spot monitor locations. Monitor One is located 9,500 feet north of the Airport in Mukilteo. Monitor Two is located 6,500 feet west of the airport in Harbour Point. Monitor Three is located 8,500 feet south of the Airport near Lake Serene. Monitor Four is the mobile monitor and is mounted in the Airport’s noise monitoring trailer and is used for spot monitoring throughout the community.

**Don Gough**

Thank you for your comments. Please see general responses: 1-1 (Why can’t the County limit or restrict operations?), 1-5 (Mitigation), 1-9 (Roles of the Airport/Consultant and their qualifications), 1-14 (What is the role of the State Environmental Policy Act (SEPA) and why is it not mentioned in the EA?), 2-1 (MRD document), 3-4 (EA conflicts with proposed terminal in Airport Master Plan), 3-14 (What actions require additional environmental review?), 5-1 (Existing aircraft noise concerns), and 7-7 (Noise impacts on schools).

**John Sullivan**

Thank you for your comments. Please see general responses: 1-6 (What are the FAA and County roles in this EA and has a decision been made to move forward?), 1-12 (Adequacy of public involvement and release of the Draft EA and Public Hearings), and 2-1 (MRD document).

**Bechara Mallouk**

Thank you for your comments. Please see general responses: 4-3 (What is the demand for this proposal and how does it fit with regional planning?), 4-5 (Other modes of transportation may be better alternatives), 5-4 (Existing Traffic), 6-1 (Significance of Project Effects), 7-7 (Noise impacts on schools), 9-1 (What is the impact upon property values?), 9-4 (E.O. 10345 Children’s Health and Safety impacts analysis), 9-6 (What is the impact of the project on crime?), 10-1 (Greenhouse Gas/Climate Change), and 10-2 (Air quality conformity).

**Chris Destro**

Thank you for your comments. Please see general responses: 2-2 (Boeing reaction to the Proposed Project and effect of the Project on Boeing), 6-3 (What are the project benefits?), and 11-9 (How does this project compare to the commercial operations at Bellingham Airport?).
Thank you for your comments. Please see general responses: 10-2 (Air quality conformity) and 10-5 (Question regarding the analysis of PM10 and PM2.5). Also, please see the following individual response to comments.

**Parks: Locations**

In response to comments regarding the location of parks, the proximity of various parks and open space (including Kasch Park) to Paine Field is illustrated in Figures C3, C4 and C5 of the Draft Environmental Assessment (EA). Also, the Mukilteo Community Garden is located approximately 1,200 yards from the end of the runway, not 500 yards and is not located within the 65 Day-Night Noise Level (DNL) or greater noise contour. The baseball/softball fields of Paine Field Community Park near the approach end of Runway 34L are also not located within the 65 DNL or greater noise contour.
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 not 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
process also complied with FAA requirements which ensure a competitive selection is undertaken. Barnard Dunkelberg & Company was selected.

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.”

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 and EISs 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 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 airports are those 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 128th Street SW/SR-96 (WSDOT intersection), and SR-525 at 84th 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 states 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 based upon 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.

---

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.7 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.
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.

8 **Source:** Highway Capacity Manual 2000.

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.

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.
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</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.”

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%).

---

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>No Action</th>
<th>Preferred Alternative</th>
<th>Project-Related Emissions</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Year 2008</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Aircraft</td>
<td>17,068</td>
<td>NA</td>
<td>NA</td>
<td></td>
</tr>
<tr>
<td>Ground Service Vehicles</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
<td></td>
</tr>
<tr>
<td>Ground Access Vehicles</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
<td></td>
</tr>
<tr>
<td>Total</td>
<td>17,068</td>
<td>NA</td>
<td>NA</td>
<td></td>
</tr>
<tr>
<td><strong>Year 2013</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Aircraft</td>
<td>23,527</td>
<td>25,159</td>
<td>1,632</td>
<td></td>
</tr>
<tr>
<td>Ground Service Vehicles</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
<td></td>
</tr>
<tr>
<td>Ground Access Vehicles</td>
<td>NA</td>
<td>1,260</td>
<td>1,260</td>
<td></td>
</tr>
<tr>
<td>Construction</td>
<td>NA</td>
<td>316</td>
<td>316</td>
<td></td>
</tr>
<tr>
<td>Total</td>
<td>23,527</td>
<td>26,735</td>
<td>3,208</td>
<td></td>
</tr>
<tr>
<td><strong>Year 2016</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Aircraft</td>
<td>23,424</td>
<td>27,276</td>
<td>3,852</td>
<td></td>
</tr>
<tr>
<td>Ground Service Vehicles</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
<td></td>
</tr>
<tr>
<td>Ground Access Vehicles</td>
<td>NA</td>
<td>1,713</td>
<td>1,713</td>
<td></td>
</tr>
<tr>
<td>Total</td>
<td>23,424</td>
<td>24,969</td>
<td>5,565</td>
<td></td>
</tr>
<tr>
<td><strong>Year 2018</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Aircraft</td>
<td>23,432</td>
<td>27,283</td>
<td>3,851</td>
<td></td>
</tr>
<tr>
<td>Ground Service Vehicles</td>
<td>NA</td>
<td>NA</td>
<td>NA</td>
<td></td>
</tr>
<tr>
<td>Ground Access Vehicles</td>
<td>NA</td>
<td>2,166</td>
<td>2,166</td>
<td></td>
</tr>
<tr>
<td>Total</td>
<td>23,432</td>
<td>29,449</td>
<td>6,017</td>
<td></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.4

(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_{10} and PM_{2.5}). The Environmental Protection Agency (EPA) has designated the Snohomish County as attainment for both PM_{10} and PM_{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_{2.5} concentrations. The 2007 Air Quality Data Summary Report\textsuperscript{17} by the PSCAA states:

\textit{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.}

\textit{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 PM2.5 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 PM2.5 levels occur in heating months when wood stoves and fireplaces contribute the majority of PM2.5. (Page 3)}

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/m3 which was adopted in 2006). Daily PM_{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_{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.

The air quality modeling within the EA covers the analysis for both PM\textsubscript{10} and PM\textsubscript{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 O\textsubscript{3} 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.