## Appendix R

### Hearing Two Commenter List

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

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Responses to the hearing comments are listed following the hearing transcript.
PUBLIC HEARING RE:

NATIONAL ENVIRONMENTAL POLICY ACT

DRAFT ENVIRONMENTAL ASSESSMENT OF PROPOSED COMMERCIAL
AIR SERVICE AT PAINE FIELD

JANUARY 5, 2010

SNOHOMISH COUNTY PUD, EVERETT, WASHINGTON

REPORTED BY:

SHARON L. WESTLING, Registered Professional Reporter
No. 2301
January 5, 2010

MR. DRISCOLL: Good evening. My name is Tim Driscoll, I'm going to be the moderator or the facilitator for tonight's hearing.

This is a hearing that is being held pursuant to the National Environmental Policy Act. During the course of the evening you'll probably hear the acronym of that as being NEPA. It's the initials for each of those words, National Environmental Policy Act. And pursuant to NEPA, this is being held to receive comments on the adequacy of the Environmental Assessment that has been drafted to address the possible or potential economic, social, and environmental consequences of the introduction of commercial airline service to Paine Field; and for the modification and some construction, some modular construction of an airport terminal at Paine Field.

During the course of tonight's hearing -- I'm just getting all attune to what the acronyms are. The Environmental Assessment is probably going to be referred to as EA. So that's what the EA stands for. I find whenever I go into some lecture where I don't know the acronyms and the jargon of the profession, half my time is spent trying to figure
out what they're talking about. What does the EA stand for. So it's the Environmental Assessment. It's very similar in state law to an Environmental Impact Statement. But we're not going to call it that, we're going to call it the Environmental Assessment.

And for these activities to occur that have been proposed, namely the introduction of the airline services and the improvements to the terminal, the Federal Aviation Administration must conduct these hearings in order to issue any permits. So that's the purpose of the hearing. And that's the purpose as stated in legalese. Putting it in common language, the purpose is to provide you, the public, an opportunity to have an input as to the environmental review of this project.

As I stated, the EA has been drafted, and this is the hearing now in which you can present any comments you have on that EA.

Your comments can be related to how the EA is deficient, what the EA failed to address, or any other items that you feel are germane to the issuance of this EA.

There will be no decision made tonight on any of your comments. This is a fact-finding process.
This is to get the information before the FAA and its consultants in order to give them the opportunity to address each of these issues that you're going to raise.

We have a court reporter here tonight. She is taking down all of the testimony.

In addition, there's a box over there where you can submit any written comments. All of those written comments and all of your testimony will be addressed in the final Environmental Assessment that is to be issued on this matter.

So if you really want something to be considered, and you think it is inadequately presented, or you want your opinion known on it, I advise you to testify.

With regard to the hearing, we're going to start in a couple minutes. We'll have the consultant, Mr. Ryk Dunkelberg, who's the main spokesperson for this presentation. Mr. Dunkelberg will give a brief presentation as to what is proposed and what the basic findings have been to date.

After that is completed, we are going to take public testimony. And I'm going to have a few rules that I want you to pay attention to with regard to the public testimony.
When I last checked, we had 46, 47 people who have signed up to testify. If you desire to testify and you have not done so, you might just go out after I'm finished speaking and just get a sign-up and get a number. That number during the course of the hearing, during the course of this hearing, will be called, and you will be given the opportunity to testify.

All testimony is to be given at the podium. And the testimony -- well, there's no podium, the microphone. And the testimony is to be given to me. The reason I'm doing that is that we are taking the information, the court reporter has to be able to understand what you're saying. The court reporter cannot understand or cannot hear all the comments if your back is turned to the reporter, or if you're walking around. So all testimony is given at that stationery point to me so that the recording secretary can get it so it will be considered in the final EA.

I'm going to be handed all the numbers here in a minute. And at the outset of the public testimony, I will start calling numbers, 1, 2, 3, 4. I'm going to call about four numbers. And there are seats right in front, directly in front of me. And so you
can, when I call your number, you can come and have a seat and just wait until it's your turn.

If for some reason I call your number and you've decided you don't want to testify, that's fine, just give me a signal that you're not going to testify and we'll move on to the next number.

You will be given three minutes to present your testimony. And we have this very high tech machine here, it's one of these filler notebooks, which has two pieces of paper. And this was created by an engineer. I saw him create it yesterday. But the first, when you're getting close to the end of the three minutes, you have about 30 seconds, I will flip it over and you will be looking at me and you will be seeing it. And then at the end of the three minutes you get the pink card, time is up. I would like you at that point to sum up.

As I stated, we got 40-some, almost 50 witnesses. So we could be here for a little bit of time, and it's only fair that everybody get a chance to be heard. If you do not have enough time to present everything you want, you can always present it in writing. And the written materials are going to be considered just as much as the oral testimony.

Now with regard to the testimony, I did not come
from underneath a rock. I know that this is a very controversial issue. And it has received a great number of articles in the press, and there are a lot of positions on this matter.

The purpose of this hearing is not to make a decision. The purpose is to get the facts. So what I'm going to request -- I'm not going to request, I'm going to demand. After or when someone is testifying, I want you to give that person the same respect that you would expect if you were in that situation. That means no hissing, booing, shouting out, harassing, or anything of that nature. Let the person have his or her say.

I would also request that, seeing time is limited, and I want to keep this thing going, and this is not a popularity contest one way or another, I do not want any clapping or booing or cheering after the testimony. That does not create an environment fair for everybody. It creates a hostile environment if you might have a different opinion, and it might create some intimidation to get up and speak. So no cheering, no booing, no hissing. Listen. Just listen. And I think that we'll have a much better hearing.

I'll probably have to announce that again, but
I'm dead set on this being the rule of this hearing, because I want everybody to be given a chance to speak and to speak what they believe in.

Getting up to testify is not the easiest thing in the world. And when you have hecklers in the back, it just adds to the intimidation. Serves no purpose whatsoever.

Let me see. Let me go through the rest of my notes here.

If for some reason or other you do not have your written comments prepared today, or if you go home and you get this great brain wave or thought, I should have said that, you can still submit comments, written comments. They are to be submitted no later than February 5. And we'll give you the address during one of the breaks, or you can come up here and get the address where they can be sent. And they can be sent by e-mail as well.

We'll give you the e-mail address as well.

A WOMAN IN THE AUDIENCE: That is today.

MR. DRISCOLL: February 5. January is really a long month. Okay.

Those are, they're very basic rules. The main concern I have is running an orderly hearing. And, as I say, we got nearly 50 people, be 150 minutes.
We could be here late, and I want to get out of here at a reasonable hour.

So are there any questions on the procedure I'm going to follow? Okay. I see none on my left. None straight ahead. And none to my right.

I'm sorry. Yes, sir.

A MAN IN THE AUDIENCE: So just comments on environmental part of it? You don't want taxes and anything? That's what I don't understand. You just wants comments on what was presented on the environmental thing?

MR. DRISCOLL: Yes. Technically what this is is these are supposed to be comments on the Environmental Assessment that has been issued for this project.

Now, if you're unfamiliar as to what's in it, and I wouldn't be surprised on that, because it's a very large document, but if -- it would not hurt to at least address, if you think something should be in there, you're unaware if it is in there or not, to provide that during your testimony.

A MAN IN THE AUDIENCE: Understanding that you're trying to keep things in a reasonable time frame and all that, but also understanding there's probably people out here more prepared than others
and coming forward. Three minutes may seem a little bit short. Can others that have time -- yield their time to others that are more prepared?

MR. DRISCOLL: They can do so. They should probably get a number and give you the number. But I do want it to be reasonable, too. Because we have provided you also an opportunity for the written materials to be submitted. So if you have somebody that would be testifying, or who's not signed up to testify, you can give their number and let them know at the outset.

But, again, I'm going to be pretty strict on that, because it's amazing what you can say in three minutes, too, if people aren't interrupting you.

Other questions?

Yes, sir.

A MAN IN THE AUDIENCE: Can we mention names?

MR. DRISCOLL: Names aren't going to do any good. For what purpose?

A MAN IN THE AUDIENCE: Well, let's put it this way. The very people that are here for it were totally against it when I wanted to develop something. Can we mention names?

MR. DRISCOLL: No, no. No names. We're talking
about the environment, not names.

A MAN IN THE AUDIENCE: I'll respect that.

MR. DRISCOLL: Yes, sir.

A MAN IN THE AUDIENCE: What's the 4th and the 21st events?

MR. DRISCOLL: The 4th was last night, there was a similar hearing held last night. And the 21st is going to be another session very similar to this and last night.

A MAN IN THE AUDIENCE: Each on environment?

MR. DRISCOLL: On this very same issue, right. And Mr. Dunkelberg will explain where that hearing is going to be. They have changed it from Lynnwood to somewhere in Mukilteo. I'd explain it, but I don't have it right in front of me.

A MAN IN THE AUDIENCE: Kamiak High School.

MR. DRISCOLL: Are there any other questions?

Okay. I do not hear any.

So I'm going to, as I stated, I'm going to have Mr. Dunkelberg make the initial presentation, give the background of this.

MR. DUNKELBERG: Thank you very much.

I'm Ryk Dunkelberg, and I'm with Barnard Dunkelberg & Company, and we are the primary consultants that prepared the Environmental
Assessment.

And what I'd like to do tonight is go through a fairly short, about 20, 25 minute presentation on the contents of the Environmental Assessment and what we found through doing the analysis of the Environmental Assessment.

And as this slide shows, you can see that there are three public hearings planned for this particular document. The first one was held last night. This is the one tonight. And then the 21st of January there will be another public hearing. And we will get you the name of the school and the address of that at the end of this presentation.

What I'd like to do is go through a very short introduction on the Environmental Assessment, a little background, and then go through the draft EA itself.

We're going to go through the chapters of the Environmental Assessment, and then get to the meat of the document, and that is, the consequences chapter. In other words, what are the impacts. What are the impacts result of the proposed projects.

Then, as Jim said, we'll take public comment. And then after public comment, we will respond to
all the comments that we receive in the final report. We will take all comments, electronic comments, written comments, and verbal comments and respond to those in the final report. So all your comments are important, and we will respond to each of those.

The purpose of the hearing, this is what Jim said, to explain the project and receive public comments on the Environmental Assessment. We like to kind of keep those comments to the Environmental Assessment itself. The comments can be either verbal tonight, they can be written tonight, we've got comment forms over here on the table which you can take home, fill out later. They have got the address of where they can be sent to mail them in, or they can be submitted via e-mail. And we've got the e-mail address on the board over here. And we'll also have them on the screen if you want to copy those down.

What's the purpose and need of the project? In other words, why are we doing it? The purpose of the federal action, and whenever there's a federal action you prepare an Environmental Assessment, or an environmental document to evaluate the requests from both Horizon Air and Allegiant Air for the FAA
to amend the Operation Specifications for those particular airlines to allow scheduled commercial service at the airport; and approval of an amendment to the Airport’s Operating Certificate under Code of Federal Regulations Part 139. Those are the federal actions.

Along with the need for the addition of a modular terminal building is to accommodate proposed scheduled passenger service. We have to accommodate the passengers that get on those airplanes.

The need is established in federal statutes and regulations that direct the FAA to respond to certain requests. The airlines have requested for the FAA to approve this.

There’s limited discretion in approving the amendment to the Airline’s Operations Specifications, or the Airport’s Operating Certificate if all safety and other requirements are met. If the airlines serve the airport with aircraft that are certified to operate in the United States, if they are the type of aircraft that can operate safely at this particular airport and they meet the other requirements, then there is little discretion on the part of the FAA to approve or not approve those amendments.
And in order to safely and efficiently serve the carriers and the passengers, the existing passenger processing space must be increased. If we're going to accommodate passengers on scheduled services, we've got to meet all the security requirements and things of that nature.

What are the proposed operations? Two airlines have proposed to operate here, Horizon Air and Allegiant Air. Horizon Air will use Q400 aircraft, those are turboprop aircraft, same aircraft they operate today, to initiate service at the airport with six departures per day increasing to ten departures per day in the year 2016. This represents about 4300, 4400 operations per year initially, growing to about 7300 operations per year. They have also asked that the CRJ, Canada Air Regional Jet 700, would be used as a backup aircraft if needed.

And an operation is either a take off or a landing. Every time an air carrier flight comes in and leaves, that's two operations.

Allegiant Air. Allegiant Air will be using what's called McDonnell Douglas 83 aircraft. That's a jet aircraft. They would like to initiate service with two departures per week increasing to ten
departures per week in 2016. This represents about 208 operations per year, growing to about just over 1000 operations in 2016.

An additional 4588 operations, growing to 8340 operations during the planning period, resulting in approximately 112,000 enplanements. What that means is people getting on the airplane at Paine Field. Those are enplanements. So they're estimating about 112,000 people per year getting on those aircraft at the airport, that number growing to approximately 238,000 enplanements in the year 2016.

This particular table shows what the forecasted aircraft operations would be at the airport without the proposed project. In other words, the no action scenario.

What this table shows is that in the year 2008 there were actually 143, almost 144,000 operations at the airport. Remember, that's a take off or landing.

In 2010 that's projected to be about 151,000. And in 2016, about 162,000 annual operations without the project.

So what does the project entail? This tables shows what we call the no action operations. And then this particular column shows those operations
and enplanements with the project. As we talked
about, in 2010, without the project, there would be
about 151,000 operations. With the project that
same year, about 155,000 annual operations. Just
under 5,000 additional operations per year, with
about 112,000 enplanements, people getting on the
airplanes at Paine Field.

In 2016, without the project, about 162, 163,000
annual operations. With the project that grows to
about 170, 171,000 operations. Resulting in about
238,000 enplanements, people getting on the
aircraft.

That's the proposed projects which the airlines
have proposed to operate. And when we're looking at
the impacts or the effects of that proposed project,
we have to look at alternatives. And some of the
alternatives that we've looked at initially in the
document are shown on the slide. We always have to
compare the proposed project against the no action.
In other words, what are the effects? What's the
difference? What's the change?

We then look at the preferred alternative.
Obviously that's what we're evaluating. But are
there alternatives to the proposed project which
would also meet the purpose and need?
And we looked at the use of other airports.

The use of other aircraft.

And then we looked at constructing a large permanent terminal as shown on the airport layout plan. The existing airport layout plan for the airport has a terminal building placed on that. Now that terminal building has not been environmentally cleared, but it is shown on the existing airport layout plan as approved by both the county and the FAA. The terminal building shown on the airport layout plan is larger than the proposed modular terminal building.

The next step in preparing an Environmental Assessment is you need to determine and identify what the existing conditions are. What resources could potentially be affected by a proposed project? And there are about 21, 22, 23 resources that we evaluate to the Environmental Assessment process. And those are shown on the slide. Some of these are very important and critical. Each project has different critical resources.

And some of the ones we look at, obviously air quality. And these are listed alphabetically. Air quality will be affected.

We look at coastal zone resources, because we're
close to the Sound.

We look at compatible land use. Compatible land use is usually defined by, or in conjunction with, aircraft noise levels. So we look at those things.

DOT Section 4(f) sites. Generally what that means is Department of Transportation laws have identified certain resources which are very critical and very sensitive. Those are generally defined as recreation areas, parks, things of that nature, along with historical sites. So we need to see if any of those type of resources would be significantly affected.

We also look at endangered species, plants, animals. What I call the bugs, bunnies, and birds.

Floodplains.

Hazardous materials.

Historical, cultural, archeological resources as they are part of the Section 4(f) issue.

Light emissions.

Natural resources.

Noise as it relates to compatible land use.

Socioeconomic resources.

Surface transportation. Any time you introduce new commercial service to an airport, you're going to introduce passengers. Those passengers are going
to come in vehicles. So we have to look at the vehicles as they result in air quality, or as they affect existing roadway system.

We look at water quality, and we look at wetlands. So we identify what's in the area as our existing conditions.

We then look at the environmental consequences. And the environmental consequences, in other words, what are the impacts? What are the effects of a particular project on the environment?

And we'll look at these alphabetically the same way we looked at the affecting environment chapter, with the first one being air quality.

This particular slide shows the effects of pollutants on this axis over here, and how many tons of pollutants would be generated with no action alternative. In other words, the number of aircraft operations that would occur here without the project. The preferred alternative for both between 2011 and 2016. And then those project-related emissions which would result strictly as a result of the proposed action.

So this column shows the different pollutants. We have different levels of emissions, including the vehicle, the ground transportation vehicles, they're
all added into this.

And you can see, the largest number, about 70 here and just over almost 76 here, are carbon monoxide. And those are tons per year of emissions in those two years.

Okay. Well, in addition to the actual operations, there's going to be some construction issues. There will be some emissions associated with the construction of the terminal, the module terminal building. Those are shown in this table. They are very slight compared to the project emissions, because the construction of the module terminal is only going to take about 90 days. So we have these emissions.

Okay. Now, then, this particular table describes the emissions breakdown by type of element which makes those pollutants. In other words, we've got aircraft operations; we have ground support vehicles, the tugs, the trucks and things used to support those aircraft operations; and then we have surface travel, vehicle miles traveled for automobiles. And then we have a total.

So for the proposed project for 2011 and 2016, we break those emissions down by each category that causes those emissions.
And what we're interested in in this analysis is to see if we exceed any thresholds of significance. This is what we look at in each category of the resources in the consequences chapter is to see if we exceed any thresholds of significance that are federally defined. If we exceed those thresholds of significance, then we have an impact, a significant impact. So this is the first resource category we're looking at, we want to see if we exceed any of those thresholds of significance.

And here we're talking about what's called a de-minimis amount of carbon monoxide in tons per year. And the threshold of significance is one hundred tons per year.

Adding all the emissions together, we do not exceed that number in any of our project years. So we do not exceed the thresholds of significance for air quality.

Other resources that we're looking at. Coastal zone resources. We're close to the Sound. What do we look at there? Do we have any effects? Well, the Snohomish County Economic Development office has indicated that development on the airport is not subject to the requirements for shoreline substantial development permit.
We have coordinated with the Washington State Department of Ecology, and they indicated that completion of the EA, and environmental determination by the FAA, a certificate of consistency with the coastal zone management program must be applied for. So that's something that must be done after we get a federal determination.

Other resources. Compatible land use. I'm going to talk more about compatible land use when we get to noise. But suffice to say that generally speaking, all areas within what we call the airport influence area around the airport are zoned to be compatible with the airport operations.

When we're looking at construction impacts, we look at best management practices as defined by both the FAA and the county for construction activities.

I mentioned Department of Transportation Section 4(f) properties. There are no parks, recreation, or historical sites within the airport area that would be affected by aircraft operations.

There are no critical habitats, nor any threatened or endangered species that would be affected by the proposed project.

There are no floodplains which would be affected by the project. So there is no significant impacts
on those categories. No thresholds of significance are exceeded.

Historical, archeological, architectural and cultural resources. These are categories of their own, and the FAA needs to coordinate with these different entities to make sure we don't affect that.

The FAA has consulted with the Washington Department of Archaeology and Historic Preservation, and that particular agency has agreed that there are no historic properties that would be affected. There's a no effect determination that they have agreed on.

In addition to that, the FAA has consulted with the tribes. They have consulted with the Stillaguamish, the Sauk-Suiattle, and the Tulalip Tribe. And as of today there's been no response from the tribes as to whether they think that proposed project would affect any of their cultural or religious activities.

Lighting issues. There's no light emissions that would be generated by the proposed project.

Natural resources, energy supply, and sustainable design would not be affected. There's no thresholds of significance that are exceeded by
any of those resource categories.

Now another category which is very important, this ties back to the land use, is noise. Aircraft noise. Aircraft noise is identified and determined using a special metric. That metric is called the day night noise level. Abbreviation is DNL. And it is an annual average cumulative noise level which takes into effect all aircraft noise that occurs over a year. And this particular slide shows the existing 2008 noise contours associated with actual aircraft operations and types that operate at the airport in calendar year 2008.

The slide shows two noises contours, the largest noise contour is the 65 DNL contour. That's this contour right out here. The next smaller contour also in yellow is the 70 DNL contour. Both those contours basically on airport property.

The 65 DNL contour, the largest contour, is the threshold contour for noise sensitive uses are deemed incompatible. In other words, if you have a noise sensitive use, such as a residential structure, a school, a hospital, a religious facility within the 65, that is considered to be incompatible.

In 2008 there were no noise sensitive uses
within the 65 or greater day night noise level. And there were no incompatible land uses.

Now, the DNL contour is very similar to a topographic contour in that it connects points of equal noise energy. And so these contours represent the 65 DNL associated with both aircraft operations and aircraft run that Boeing does, and other users of the airport. So takes all aircraft operation activity into consideration.

We then look at 2010. And we take all the aircraft operations as presented in an earlier slide, and we generate a noise contour. This particular slide shows, again, the outer -- the 65 DNL noise contour. The next one inside that is the 70 DNL.

What this slide also shows, and it's very hard to see, is the with and without project noise contours for that same year. There's very little discernible difference in the size of the noise contours as generated by the integrated noise model with and without the project. There are very few additional operations of the overall number of operations for the airport that generates a very large contour.

And again, in 2010, there are no incompatible
land uses within the 65 or greater DNL noise contours. And that's the threshold of significance.

We then look at 2016. The same thing. This slide shows two noise contours, the outer noise contour being 65, and the inner noise contour being the 70. It also shows the with and without project noise contours. The yellow and the red. The red is with the project, the yellow is without the project. And, again, there's very little difference between the with project contours and without the project contours.

There are no thresholds of significance exceeded based on noise and compatible land uses.

We then look at secondary or reduced impacts. What would happen. We also look at socioeconomic, environmental justice issues, and children's environmental health and safety risk issues. And there are no significant impacts associated with those resource categories with the proposed projects.

The next real critical issue is surface transportation. In other words, how many vehicles, how many ground vehicles, how many trips would be associated with those enplaned passengers that we talked about getting on aircraft at the airport.
Traffic analysis was done in coordination with the Washington State Department of Transportation, Snohomish County, City of Everett, the City of Mukilteo. Impacts analyzed for existing conditions, 2010, 2011. In other words, what would happen first year of operation with and without the project, and year 2016, future operations, with and without the project. Compared the project effects to the no project effects.

The proposed projects would not cause any arterials or intersections to operate at a deficit level of service. That additional traffic would not cause that.

However, traffic mitigation fees are a local requirement based upon new trips. And so there would be some mitigation fees paid based on local requirements, but not because any thresholds of exceedance have been -- thresholds of significance have been exceeded.

This analysis assumes that there would be no reduction of vehicle trip diversions from existing operations at either Sea-Tac or Bellingham. In other words, the analysis assumes that all passengers would be new passengers and would create new traffic on the roadways and new air quality.
That does not assume any diversions.

Next we look at water quality issues. There would be a small increase in impervious surface. Here is the proposed modular building. Here's a breezeway connecting the proposed modular building to the existing building which houses the airport administrative offices. Right here is grass. And so there would be a little bit of impervious surface which is covered by the breezeway which is not impervious today. The rest of the structure is all on existing, so there would be very little impervious surface. So there would be very little additional runoff or water quality.

There are no wetlands present in the area that would be affected. So there's no wetlands.

We look at cumulative impacts. We look at approved and proposed projects which could have an affect with our proposed project which then could result in any thresholds of significance being exceeded.

We looked at all the approved projects that the county has on their books, and we looked at proposed projects such as Mukilteo Town Center, the Center 44 Commercial Development, and the Metropolitan Commerce Center. There are no past, present, or
reasonably foreseeable projects that are suspected to cumulatively add to aircraft generated noise to produce a significant impact. So there's no significant impacts based on cumulative analysis.

Now, then, one comment we got last night, a lot of comments we got last night had to do with what additional analysis, if any, would be required. So we've added this slide to the presentation which we didn't cover last night.

If additional commercial service actions are proposed, what would be -- which ones would require a need for determination? Well, if another airline wanted to commence service here, a NEPA determination has to be made.

If the existing airlines wanted to introduce a new aircraft type, another NEPA determination has to be made.

If the existing airlines wants to fly to new or additional cities other than what's in the proposed operation specs today, then a NEPA determination would have to be made.

And if there's is a new or expanded terminal building, then a NEPA determination would have to be made.

So NEPA determination made today, if one is made
based on the proposed actions, only covers the type of aircraft, the airlines, the cities they're flying to and from, and the module terminal building.

We talked about comments earlier. Again, we're going to take verbal comments tonight at the microphone.

We'll take written comments. The written comment forms we have at this table over here have the address of where you want to send them in if you want to take them home, think about it, add new comments. We have the address there to send them in.

We also have e-mail address. If you want to e-mail any comments, these are the addresses to e-mail. They're also on a board over here that you can copy down if you haven't done so already. And comments are accepted through February 5, 2010.

MR. DRISCOLL: A couple minor matters I forgot to mention at the outset.

Please turn your cell phones off if you haven't done so already.

And if you did not sign in, we would appreciate it if you would sign in on one of these sign in papers we're sending around during the course of the meeting tonight. Put your name and address on
there. If for nothing else, gives us a record of who was attendant tonight.

When you come down to testify, please, before you do, please give your number card to the court reporter, which should have your name and address on the back of that. Make sure it's legible. Make sure your name is legible so the reporter can read it. That's usually why we request it be legible.

Okay.

Cards 1, 2, 3, and 4.

Who is card 1?

2, 3, and 4 can sit down.

Say your name and address before you start.

MR. AVLON: Mark Avlon, AVLON, 19813 28th Avenue West, Lynnwood.

Good evening, and thank you for the opportunity to comment.

I have two major issues with this report. As you pointed out in the slide, the purpose of the report is to talk about the issues of changing the permitting of the airport, which isn't really just about adding a few flights, it's about changing from noncommercial to commercial flights. When that occurs, we're not limited to these two flights. It opens up the door for much more.
The other fundamental issue I have is with the boundaries that are here. The DNL lines are within the airport property; but this room is filled with people who are going to be affected by changes at the airport. So the DNL lines don't really affect the environment that's going to be impacted. Okay.

We're going to hear a lot of things tonight about developers saying how wonderful this is. We're going to hear from airport administrators how wonderful it is to have service to their city. The Economic Development Council is going to talk about how wonderful it will be for the area. But they're not interested in the negative impacts that these people are going to suffer, the financial losses they're going to suffer, the suffering and quality of life that they're going to incur. This report doesn't address any of that. Okay.

Those stakeholders that want something, that are going to benefit economically, don't live in the DNL lines. They don't even live within five miles of this airport. These people do. They're here because they're going to be impacted.

Thank you for your time.

MR. DRISCOLL: Thank you, sir.

Number two.
MR. ROBERTSON: Paul Roberts. I'm a member of the Everett City Council. My address is 2930 Wetmore Avenue. However, in my day job, I actually conduct environmental reviews exactly like this, and have conducted environmental reviews in this area. So my comments are really to supplement what is there on the record in the EA.

And I want to thank Barnard Dunkelberg for an accurate and adequate Environmental Assessment.

The assumptions that have gone into this assessment represent an extraordinary abundance of caution. And the assumptions are extremely conservative in favor of the environment, and represent a belt and suspenders approach to the review.

Some context. The issues which are not in the EA, but I think are worth noting on the record, is that this area, this 4,000 acre area including Paine Field and the surrounding southwest Everett area, has probably undergone more environmental review than any other piece of property in the State of Washington.

And those environmental reviews include the Boeing master plan and EIS for the triple seven done in 90 and 91, the Paine Field master plan and park
150 noise study done in 95, the southwest Everett Paine Field sub area plan and Environmental Impact Statement done in 96, the Paine Field master plan and noise study update done in 2002, and more recently, the Washington State Department of Transportation long term aviation transportation plan done in 2009.

I was responsible for the Boeing EIS and the southwest Everett EIS, and was a member of the aviation planning -- State's aviation planning council. So I've participated in those efforts.

Some facts to supplement the record are that Paine Field is currently on rating at 40 percent of its capacity. Slightly less.

The EA assumes all transportation trips are new regarding the commercial service. In fact they are not. And other studies suggest otherwise. But again, the abundance of caution plays here. The reality is that these trips, at least in part, will be diverted from Sea-Tac or Bellingham to Paine Field, and will result in a small but positive impact in the amount of air pollution and the amount of vehicle miles traveled that would otherwise be directed to those airports.

The southwest Everett plan really had a shed of
about 83,000 jobs within this area. Today we are at about 44,000. And that the transportation updates that have taken place since about 95 include improvements to I-5, SR 526, SR 527, SR 99, Paine Field Boulevard, and 112 Street corridor. And they represent over six hundred million dollars worth of transportation improvements.

This is the center of aviation manufacturing. And the scope of this proposal is relatively small. So a finding of no significant environmental impact is appropriate in this case.

And I will be offering written comments to supplement what I provided here on the record. Thank you.

MR. DRISCOLL: Thank you, sir.

That's the type of behavior I'm not going to accept here. Every speaker, be it pro or con, deserves respect. And there is no booing or cheering. I don't want to hear that again, please.

Number 3.

And would 5 and 6, numbers 5 and 6 step down and have a seat.

MS. McMULLIN: Lanie McMullin, I live at 1332 Grand Avenue. I'm employed by the City of Everett. I'm the Director of Economic Development. And I
wanted to talk about a study that we did, the City of Everett in early 2008. We retained Thomas Lane and Associates, who are economic public policy consultants, to assist the feasibility of and impacts from commercial air service at Paine Field. And Thomas Lane came with some considerable experience in these issues. They have been retained by groups studying these issues all over. Probably most notable, they were retained by those fighting the third runway at Sea-Tac Airport.

But I think it's relevant tonight to talk about some of the findings of the study because of the close alignment of the findings of the EA. Tonight I would like to touch upon the findings regarding the impacts on business development, job growth, and investment.

And Thomas Lane interviewed officers and executives at 20 different companies in and around Everett as part of the study, and I wanted to highlight just a few of those findings.

They found that the primary benefit of scheduled air service would likely be tourists and high tech production activities, mainly companies concentrated in the software, biotech, and tourist industries. And it also appeared that many -- much late and
significant demand for air service existed at the
time in 2008.

They found that the following benefits would
most likely result from scheduled air.

Number one. Smaller information technology,
biotech, and other high tech businesses now located
in Everett would be retained, while the lack of
commercial air service into Paine Field would cause
them to relocate somewhere else.

Number two. The ability of Everett to attract
larger high tech and management services companies
would be enhanced by the availability of scheduled
commercial air service at Paine Field.

Number three. Scheduled commercial air service
would support the growth of the tourist hospitality
industries in Everett and in surrounding
communities, particularly high end facilities.

Number four. Scheduled commercial air service
would make moderate but significant contribution to
Everett's economic development when measured in
terms of total business revenues.

Number five. Having scheduled commercial air
service at Paine Field would attract a greater
proportion of professional, technical, and
managerial jobs than would otherwise occur. These
jobs pay good living wages and salaries, and enhance the city's economy.

Number six. Higher income, larger business revenues, more jobs, more well-capitalized companies within the city would generate increased retail sales, B & O taxes, and property taxes.

Number seven. For persons traveling out of Paine Field, there would be substantial time saving. At least one to two hours would be eliminated by not having to drive I-5 south to Sea-Tac.

Number eight. Traveler costs of driving to Sea-Tac and parking at the airport would be reduced, and the opportunity costs of time for business travelers would be significantly reduced.

Looking into the future, schedule commercial air service at Paine Field was a must, said Thomas Lane, to shift Everett's economy away from its historical blue-color base and move it toward becoming a new economy type city.

And as a result of this report and our participation with a lot (unintelligible words) looking to move into Everett, the City of Everett supports commercial air into Paine Field, and does so with a high degree of confidence that there would be minimal adverse effects.
MR. DRISCOLL: If you have your testimony written, you may also submit it in the box as well. Make sure your name is on it, though.
Number 4.
And would Number 7, come on down.

MR. GIFFEN: Good evening. Allan Giffen. I am the Planning Director for the City of Everett.

Although the purpose of these hearings is to take comments on the adequacy of the Draft Environmental Analysis, as is often the case with hearings on environmental documents, people tend to focus on whether or not they favor or oppose a particular action, and not the quality of the Environmental Analysis.

Tonight you'll probably hear testimony absent of information supported by technical data or quantitative analysis, perhaps emotional, or merely opinions not supported by facts.

One comment I read in the Herald this morning is that the Environmental Analysis did not adequately address impacts of scheduled air service. Opponents of scheduled air service contend that Paine Field will become Sea-Tac north, that the proposed Horizon and Allegiant service will be the proverbial camel's nose in the tent.
I believe it would be beneficial to have a better understanding of the foreseeable level of commercial air service that would be economically viable at Paine Field. The 2008 study by Thomas Lane and Associates prepared for the City of Everett concluded the following.

Number one. Paine Field has no chance of attracting major air carriers, such as Alaska, American, Continental, Delta, Northwest, United or US Air.

Number two. The demand for scheduled commercial air service at Paine Field and foreseeable future is about five flights per day. About ten operations.

Number three. To attract a regional partner of a major carrier, such as Horizon, will likely require some type of financial guarantee or incentive. Some form of ticket banking or other revenue guarantee will probably be required. In other words, this is a small and risky market for a commercial air carrier here at Paine Field.

Even if the number of operations were doubled or tripled that proposed by Horizon or Allegiant, the impact would still be insignificant. Rather than a camel, we are probably looking at a small house cat's nose under the tent.
We would note that the County’s Environmental Assessment has accurately determined that the long term environmental consequences of the preferred alternative are insignificant in the following elements of the environment, among several others. And these are just the hot topics. Air quality, land use, noise induced impacts, and surface transportation. These findings are not surprising nor corroborated by the 2008 Thomas Lane Study.

Councilman Roberts has identified several other major environmental documents prepared for the Paine Field southwest Everett area that support the conclusions arrived at in the current Environmental Assessment.

These impacts identified are consistent with those that are anticipated by adopted county and city comprehensive plans. Thank you.

MR. DRISCOLL: Number 5.

MR. CRANE: Is there anyone in this room that many would like to live next to Sea-Tac airport?

MR. DRISCOLL: Give me your name.

MR. CRANE: Ken Crane. Is there anyone in this room that would like to live next to Sea-Tac airport? These initial flights are just a foot in the door. Soon it would grow into an airport like
Sea-Tac.

Large amounts of our taxes would have to be spent on tearing down homes and soundproofing homes. The money would be much better spent on parking lots and light rail to Sea-Tac.

I live in Snohomish, and I don't want to hear the planes coming in and out. And I don't want the people who live around Paine Field to lose their quality of life.

And I thank you for your time.

MR. DRISCOLL: Thank you.

Number 6.

MR. STOLTZ: Good evening. Kevin Stoltz. I live in Mukilteo, Washington. And I'm also a member of Mukilteo City Council.

I moved to Mukilteo in 1983 after graduating from the University of Washington with a degree in aeronautical engineering. I worked for Boeing for several years immediately after that as a noise staff engineer.

I acquired my pilot's license at Paine Field. I've always been a fan of aviation in general, and general aviation in particular.

I am opposed to the Environmental Assessment conclusions as they are stated.
When I moved to Mukilteo, one of the reasons that I was assured that I could be a successful resident was because of the MRD which was passed, and ensured that development of the community and the surrounding area would be protected.

MR. DRISCOLL: MRD stands for what?

MR. STOLTZ: Mediated Role Determination. And that was a county document.

Then the 1990 Airport Noise and Capacity Act pretty much said that there could be no restrictions on aircraft operations, and specifically commercial air service, commercial passenger service. And that was pretty much a blow to communities in general. And that's one of the reasons that I think if we open up the door to commercial passenger service, we cannot limit the time or the number of operations.

And time is the critical factor to the surrounding communities. Even though the new airplanes are quieter, they are not quiet. And the Q400, if anybody has gone and stood under the third runway at Sea-Tac and seen a Q400 fly over, you would know that the noise level differences are not that much.

When I worked at Boeing as a noise staff engineer, we didn't even use the DNL metric because
it's a faulty metric. Averaging the noise level over a year is not a technically representative way to do it. I realize that's all you have to work with, but it's really not an effective way to do it. And I would just like to -- well, a couple other quick things.

You know, Boeing announced their third -- or their second assembly line for the 787 has been moved. And regardless of what the Boeing Company may say publicly, commercial passenger air service will allow them to have one more reason to move out of this area. And that's not what we need.

And then I guess I was going to say I'll yield the rest of my time to anybody who wants to come down here and scream into the microphone, because I know it will not change the DNL levels of this room.

Thank you.

MR. DRISCOLL: Number 7.

MR. QUINBY: Herald Quinby, Q U I N B Y.

I'm a resident of Mukilteo for the past 20 years. I was a resident down at Sea-Tac Airport for 28 years. I have vast experience of living down there. It's not good. For instance, I sold my house down there, it was valued about $125,000. I sold it for 90. That's all I could get out of it.
There's one third loss.

Another thing about the FAA rules you talk about. FAA says for every 50 passengers on an airplane there has to be one flight attendant. If you have a plane that has 65 passengers on board, you got to have one flight attendant, and 65-hundredth's of another one. So you got to have two.

And on the noise up here at this airport, and I am a member of the Puget Sound Paine Field Airport Committee, advisory committee, and planes take off at 11:30 p.m. at night, 2:21 a.m. in the morning, 11:30 p.m. at night, and 4:16 a.m. at night. Now those are only the late calls that I've recorded down that are given to me on a monthly basis by the Paine Field Airport. And those are only the calls that come in I recorded after 10:00 at night until 6:00 in the morning.

I spoke about the real estate. I spoke about the -- jet fuel. Jet fuel. You can smell this. This is like, if you've been behind a diesel car, a diesel truck, or a diesel bus, you can smell that diesel fuel. Those vehicles do not have a catalytic converter like a car to eliminate those fumes. Now an airplane doesn't have it either. They don't have
the Good Year Blimp flying behind each airplane to
go ahead and eliminate the fumes.

Instead of paying money to go down to the
airport, fly down from here down to Seattle to catch
a flight there and go on, I heard on the road, KOMO, the other day, advertised by Shuttle Express, you
can have one of the cars come to your door that has
a six seat luxury reseating, they call it a
six-passenger limo that would pick up your bags, put
them in the trunk of your car, and take you down to
the airport, take the bags out of your car, leave
them at the airport, they're not lost, you don't
have to handle them, and children up to a certain
age will go free down there. Now, that's down to
the airport. They will also take you to Portland,
all the way to Portland. And they will fly you down
there. If you had a person leaving here to catch a
flight at Sea-Tac or even here, and a car left at
the same time, the car would beat them to Portland.

So one final comment.

MR. DRISCOLL: Okay. Sum up.

MR. QUINBY: You talk about your EA that we're
doing here, the Environmental Assessment. You got
it wrong. The EA is supposed to be the Ejection of
the Airport.
MR. DRISCOLL: Number 8.

MR. GRUOL: My name is Jerry Gruol, G R U O L. My address is 14609 East Lake Goodwin Road, Stanwood.

And they say, Why is this guy here? He's from Stanwood. Well, I live out here in Lake Goodwin. If you draw a straight line from Paine Field runway, it runs right straight through my house.

And what I did is I did an altitude check of Paine Field, and Paine Field is right around 600 feet, and my house is 500 feet. So every airplane that comes in - and I admit, most of them right now are Boeing airplanes, manufactured airplanes coming in - they're scraping the tree tops of my house.

And I've had a lot of other commercial airplanes flying around. It's like a flying park out there.

And so the main reason why I'm here is I would like to get my area, my community put on the Environmental Assessment. And I didn't see that anywhere on there, any mention at all for it.

And I'll skip all the emotional stuff.

MR. DRISCOLL: Okay. Thank you.

MR. ASHBRENNER: I'm Vern Ashbrenner, A S H B R E N N E R. Mukilteo. You want the street address?

MR. DRISCOLL: Go ahead.
MR. ASHBRENNER: This is going to become a little disjointed. As things have progressed here, I've changed my presentation many times. And I did have a question. I was watching your presentation, and you had Horizon departing six times a day, but I didn't see in the numbers that you counted landings. Is this a dumb question? Is operation just a departure? So it's a landing also? Okay. I thought it was probably a dumb question.

My main objection is this just opens the door to the expansion of commercial air flights out of Paine Field. It seems harmless initially, and probably won't have too much of an impact early on, but this NEPA process is probably a lot easier once commercial air service is opened. And that concerns me greatly over a long period of time.

Also, as a previous speaker mentioned, have been reassured over the years because of the MRD. The area was allowed to develop, residential areas have built up tremendously around the airport based upon that Mediated Role Agreement. It was reaffirmed over the years. And basically we were double-crossed but the county council. And I'm sure they were under tremendous pressure by the proponents of air service to change their voting.
I also notice one of the proponents mentioned all the airlines that would not feel a desire to come to this airport. Southwest Airline was omitted from that list. Southwest to me would be a potential candidate to be landing, taking off from Paine Field.

And also, the DNL is based on average noise. That's just a phoney measurement. I live close enough to the airport to hear all the planes take off and land. There's some very loud noises. The average 65 is nowhere near what the individual incidents of noise is.

So I very much think this process is flawed. Again, I don't hold that much hope that the opposition will succeed here. There's a lot of money and power behind this effort.

Thank you for your time.

MR. DRISCOLL: Number 10. I don't think Number 10 is here.

Number 11.

MS. HORTON: Hello. My name is Natalia Horton. I live here in Everett at 1917 Walnut Street.

I am for the proposed airlines going in and out of Paine Field. I lived on an air force base for 16 years, Eglin Air Force Base, and we had all kinds of
planes flying in and out of there.

The planes that they're talking about flying in and out of here don't make near the noise, don't make near the impact that the C130, C5, F15, F16, and the 747 that hauls the shuttle around. We had that one land a lot when it would come across country.

And on the side that I don't really understand, if there's an airport, why not use it? Like I said --

MR. DRISCOLL: No interruptions.

MS. HORTON: Like I said before, I lived on the base for 16 years. After awhile you don't hear the planes. I don't care how many times a day they fly over. I have --

MR. DRISCOLL: Please, let the witness testify.

MS. HORTON: I have come to that conclusion not because I think that but because I've lived through it. And they have -- if you've got four F15's taking off at one time, that makes a whole lot more noise than one of these planes that you're talking about here today.

And, like I said, my thoughts are that with the small impact that this is going to make, it's not going to hurt the area at all to have these flights
come in and out of Paine Field. Thank you.

MR. DRISCOLL: Number 12.

MR. SUBITCH: My name is Tom Subitch. I live at 2521 Taylor Drive.

I'm approximately a mile and a half from the north flight plan for the Paine Field. I have to open my windows so that I can hear the planes. I don't hear them at all. I do hear -- the noisiest jets that leave that airport are the general aviation jets, the Gulfstream, Citations, and Lear jets who don't have the noise abatements that the other jets have.

As far as planes talking off in the middle of the night, the commercial airliners did not do that. And you can put a curfew on the airport if you want that. The planes that make noise at night are the Boeing planes. I haven't heard anybody say they want Boeing to move out.

If you live seven or eight or nine miles from the airport and you live at 500 feet, and the airport is at 600 feet, I assure you they are not scraping the trees where you live. Those airplanes where I see them coming across the shoreline between Mukilteo and my house are at least 2000 feet. And they don't make much noise at all.
Another thing that wasn't mentioned in the evaluation was the probable decrease in general aviation traffic in the future. With our economy as it is now, general aviation -- and I mean, general aviation in the form of small planes that you and I can afford to fly are decreasing. And so I think that perhaps that total flight number may change lower than you expect it.

And, as you can see, and I will say, I will add one other thing, that I am a private pilot. I do not fly out of Paine Field, I've never flown out of Paine Field. And I think that I do not enjoy getting up at 2:00 in the morning so that the shuttle can pick me up, because we're at the end of the shuttle line, folks. They pick me up first, they drop me off last. And I get to drive all around in, not a limousine, but a big van that bounces around, goes through all the holes, wander around through Lynnwood, Mountlake Terrace and everything else on the way to the airport. So I have to leave home four hours before my flight. And I would much rather leave from Paine Field. Thank you.

MR. EZUNKEL: David Ezunkel, Number 13. I live at 2095 Mukilteo Speedway in Mukilteo.
I've lived in and around Mukilteo for almost 30 years. Long enough to remember when the airport wasn't very busy, when Harbor Point Boulevard was a dirt trail, and when the Mediated Role Determination actually meant something.

Now Boeing and the airport are much busier, Harbor Point Boulevard and surroundings streets are major thoroughfares with schools, businesses, and homes all around, and the MRD isn't worth the paper it was written on.

I find the study's findings interesting, well done, and perhaps relevant for the short term; but not particularly reassuring to residents of Mukilteo and other cities around the airport.

The study really only addresses the near term. And, as Mr. Roberts pointed out, the airport is now at 40 percent capacity. But I believe that what many of us would like to hear is what will happen when the airport becomes 50, 60, 70, 80, 90 and 100 percent capacity.

So what I think we need to hear is, number one, better defined what the long term plan is for Paine Field.

Second of all, we need to have a study done similar to this that addresses future maximum
capacity, not the least capacity.

And then we need to have public discussion and hearings on that. I think only then will people begin to understand that the economic benefits of this project are vastly overstated, and the negative effects vastly underestimated. Thank you for this.

MR. DRISCOLL: Number 15.

MR. TAUCHER: Fred Taucher. And that's T as in tango, A U Charlie Hotel Echo R.

I am a private pilot, and I love airplanes, and I want to see Paine Field get in a few commercial airplanes. I do a lot of travel, especially overseas. And, like the gentleman said before, when we take an overseas flight and we have to be at the airport at 5 a.m. in the morning, actually before, and we have to leave the house here an hour and a half early. And usually we get up like at two in the morning to catch our flight at Sea-Tac.

We have been in situations like a year ago heading to go -- incidentally, I co-chair a conference in Las Vegas every year in December, and we got to the airport a year ago, it was not snowing here, but at the airport it was snowing. We get to Sea-Tac, we check in our luggage at Alaska Airlines, and they said the airport in Las Vegas is closed due
to snow. Well by the time we got back our luggage, it was heavy snow in Seattle already. And I got as far as two blocks from my house here in Everett and I had to leave the car outside because of snow. I couldn't get it up the hill.

This wouldn't happen if we had an airport right here. We can actually walk to the airport. We live in Everett, we overlook Hat Island, we see the airplanes going in all day long if I'm at home, and I never hear the airplanes.

And, incidentally, having also at one time I had my airplane at the hanger at Paine Field, and I know a fact, being a private pilot, the approach altitude at Paine Field is 1500 feet. The commercials, I think they have to be up to 3000 feet. And especially when you have the CJR jet, or the Q400, I've flown in both of them, they come in at a much higher altitude and much more quiet, especially the Q400, which is the twin engine prop airplane. And it is very quiet. I've flown into Reno quite often. It's not one of my favorite planes.

But I still would like to see jets, not for me, for other people, that do fly a lot out of Sea-Tac. It's a waste of time. It's takes up a lot of energy, and it takes less problems to the
environment than flying out of Paine Field.

Thank you.

MR. DRISCOLL: Number 14.

MR. BACHMAN: Glen Bachman. I live at 433 Crown Drive, Everett.

Ditto on all the other items that have mentioned on saving time and saving fuel on traveling to Sea-Tac Airport. I too don't like getting up at two in the morning to do a flight just up to even Portland or to Spokane to the destinations that are figured in on this program.

And I have no business interest in Snohomish County; however, I do enjoy living here. I enjoy the quality of life. And it wouldn't take much imagination to visualize the positive business impacts.

I'm begging any of the decision makers that are in this room to move forward and go forward with this program. Thank you.

MR. DRISCOLL: Thank you.

Number 16.

MR. BHEND: Mark Bhend. I live at 4126 Serene Way, on the lake there, for 31 years.

To begin with, I want to put the hat on my opponents of a few years ago. Silver shadows, over
flying property, unburned fuel particles, like I said, intimidating low overflights, this came as a result of me trying to develop a property just north of here, but actually two miles north. I joined my opponents as a result of it. And I caved in to them and actually left the property zoned as it was.

I have a lot of experience with airplanes, airports, what have you. In my better days, younger days, I was an air traffic controller in the Swiss Air Force. I learned how to fly in Paine Field. I must have done 500 takeoffs. With landings, that would be 1000.

Even though I'm a land developer and I would have a lot to gain from this development, I'm kind of against it in a way for the very thing that I mentioned.

But I also have a solution, because I always look for a solution. And the solution would be to eventually build another airport, not where it is there. It's encroached by a lot of housing and other industries. And having lived there now for 31 years, the area that would be really ideal for another airport in the north would be Stanwood.

Now some people would be pretty upset over this, but parallel to I-5, for example, is a stretch of
road there of about ten miles. I'm not saying that's the best location, but something to be considered or studied, at least. If you're going to study the Paine Field, well study a few other locations. And this would be one of them.

That's all I have to say, basically. And, as I say, I have a lot to gain. I have some trophy properties rights around the airport which could be developed as a result of this proposing expansion.

Although I must say, again, I sometimes stick my neck out by saying things I don't -- not very appreciative. The milk run to Nevada, our society is burdened with, you might say, a cancer that has to do with gambling. And gambling should be difficult. I mean, gambling places should be hard to reach. That's the way it used to be. But now you can do it after work. It's not a good idea, really.

Thank you.

MR. DRISCOLL: I don't know if that was addressed the in the EA or not.

Number 17.

Number 18. Number 18.

MR. MASCIO: Mike Mascio, M A S C I O. I live in 5708 63rd Avenue in Marysville.
And I look outside, I see the planes turning and going to Paine Field all the time. And it’s just background noise after awhile. I see them, hear them, don’t give them a second thought. The loudest thing I hear is the train. Nobody ever says anything about the train going through and making all this noise. It’s doing its job.

And I don’t -- I’m -- I’d like to see Paine Field be used and start making a little bit of money. I think that would make not a lot of jobs, but I would see a lot more jobs going into Paine Field and the Everett area for commercial service. And I’d be one of those passengers. I’d be using it on a yearly basis easily to go to Vegas and spend my money there.

And, like I say, I’m thinking of retiring, I like to travel, and I don’t want to travel to Sea-Tac. I just want to travel to Paine Field, park my truck and hit a plane and be out of town and get out of this rain for at least a week.

Thank you.

MR. DRISCOLL: Thank you sir.

Number 19.

MR. PETE: My name is Pete, and the mailing address is Post Office Box 43 in Mukilteo, though I
do live in Everett.

This is a new and interesting process for me. I'm about the most apolitical person you could possibly be, so I've been trying to watch some of the process here, and it's really been interesting.

I'm not a pilot, I'm not ex air force, I don't own property adjacent to Paine Field. My bias is for the largest land animal in the area, and you're looking at a couple hundred of them right here.

I understand when you do a government sponsored surveyor assessment of any kind you have specific protocols you have to follow. There are multiple things that this assessment doesn't address.

The health issues are not based on significant increase in the particulate matter increased by .05, it's about how they affect human beings.

Seattle has one of the highest rates of respiratory illness in the country, despite the offshore breezes, the constant rain cleaning the air. We find higher incidents here of multiple sclerosis, things that are tied to burned petrol chemicals.

The impact on mental illness is also dramatically increased by constant stressors. And, as several people pointed out, that's one of the
things the DNL measure does not get at. As an average figure, it ignores what affects people, and that is the frequency and the acuity and the intensity of the noise pollution. I think that's what a number of people here are addressing already for themselves. There's 20 years of research now about the physical health affects of those type of environmental impacts as well. Not things that look like the EA addresses. The protocols are probably not there to even investigate those measures.

I'm from Jersey. Okay. I see this, as someone mentioned going from a metaphor of the camel's nose under the tent to the cat's nose under the tent. For those of us that are allergic to cats, even that's a significant impact. That's what will put us in the hospital. This cat's nose under the tent is putting the last nail in the coffin in turning Everett into the Newark of Washington State.

MR. DRISCOLL: Okay. We're going to take about a ten minute break, then we will come back and start with Number 20, 21, and 22.

(A recess was taken.)

MR. DRISCOLL: If you are testifying and you have written testimony as well, you can put it in the box.
If you've already testified and you wanted to put it in there, bring it down during the break.

Okay. We left off at Number 20. Who is 20? Is there a number 20 here?

21? You're 21.

MR. STUART: Mike Stuart, I live up in Everett. And you failed to put in the noise level of military aircraft, volume of future military aircraft, the kind of aircraft the military leases. Until you add that to your determination, it's flawed. It's not right, because it's -- you cannot come up with a full level. It's flawed. You have to add the noise level the military makes to that airport.

MR. DRISCOLL: Okay. Thank you, sir.

Number 22.

MR. MARINE: I'm Joe Marine, I'm the mayor of the City of Mukilteo. 11930 Cyrus Way, Mukilteo, Washington.

I've submitted that in writing so you don't have to try to keep up with me. I'm going to go as fast as I can.

It is the position of the City of Mukilteo that the DEA is inadequate for two principle reasons. It does not acknowledge or analyze the full scope of
the project; and it does not adequately address the environmental impacts of the whole project.

The DEA does not acknowledge or analyze the full scope of the project.

A. The project is defined to include an operation certificate amendment for Paine Field, which changes the airport from a Category IV airport, which does not allow scheduled service, to a Category I airport, which allows virtually unlimited operations by all types and classes of aircraft.

B. Facilities already exist in the existing terminal, 1600 square feet, under the master plan, as well as that portion of the approved master plan projected for development of a new terminal of 30,000 square feet. And it can be added to the modular terminal to meet the unconstrained demand projected in the current master plan.

C. Therefore, the project allows a virtually unlimited number of airport operations to meet unconstrained demand, with more than sufficient facilities to accommodate the increased operations.

D. Nevertheless, the DEA uses only the numbers of operations forecast by the first two carriers to request access, Horizon and Allegiant. It does not
take into consideration the potential for a far greater number of operations created by the modular terminal when combined with existing and projected terminal space.

Master plan page B 16 forecasts by 2016, the last year analyzed by the DNA, anywhere from 16,817 to 40,872 scheduled air carrier operations could occur, representing anywhere from 144,630 to over 1,461,000 passengers using Paine Field.

Thus, the DEA severely understates the scope of the project, its prospective capacity, and its resulting impacts.

The DEA also fails to mention, let alone analyze, the project's reasonably foreseeable cumulative impacts.

First, more gates mean more aircraft, which in turn means more noise.

The DEA states that it is county policy not to encourage commercial passenger service at the airport.

However, the additional facility projected in the master plan, when combined with the modular terminal that is subject of the DEA and the existing terminal facility, effectively remove that decision from the county, because federal law requires
airports to accommodate any aircraft that desires access, so long as airport facilities and equipment can accommodate it safely.

The DEA does not predict that Horizon and Allegiant will use the full capacity of modular terminal until 2016. Until that time, there is unused capacity that could be used by other airlines which, in the long run, may require construction of the planned terminal.

Therefore the DEA ignores the increased noise impacts resulting from the reasonably foreseeable increment of aircraft operations that the project will enable through the final master plan year 2027.

The DEA also ignores the project's cumulative air quality impacts.

The conformity provision of the clean air act requires that all federal projects, such as this one, conform to a state air quality implementation plan.

While Paine Field is in a maintenance area, rather than an area that is nonattainment of the SIP's air quality goals, if a federal project emits more than one hundred tons of carbon monoxide, a full conformity determination must be performed.

Even based on the limited terminal facilities
and forecasts of operations, the DEA predicts the project will emit 75 tons of CO per year by 2015.

Since the DEA only evaluates the emissions impact from the current phase of development, the modular terminal, and fails to take into account the impacts of the reasonably foreseeable future projects, emissions of CO could very well exceed one hundred tons per year in 2016.

The DEA does not analyze the project’s potential climate change impacts.

While NEPA predates the current climate change sensitivity, courts have recognized the importance of the evaluation of climate change in NEPA documents.

Specifically, the Court of Appeals for the Ninth Circuit stated as recently as 2008 in Center for Biological Diversity versus National Highway Traffic Safety Administration, that it is NEPA’s purpose to ensure that the environmental information, including information about climate change, is made available to the public officials and citizens before decisions are made and actions are taken.

The DEA contains no mention, let alone any analysis, of potential climate change impacts of the project, either individually or, more importantly,
cumulative.

The DEA does not acknowledge or analyze the project's manifest growth inducing impacts.

A federal government agency is required to evaluate not merely the direct impacts of the project, but also its indirect impacts, including those caused by the actions and later in time but still reasonably foreseeable. 40 CFR section 1508.8.

Indirect impacts include a project's growth-inducing effects, such as changes in patterns of land use and population distribution associated with the project.

The DEA entirely ignores this requirement, although this project is virtually defined by its growth-inducing impacts.

The project certifies the airport for virtually unlimited use not previously allowed.

The project permits the construction of new terminal facilities, including new gates to accommodate such use. And, when combined with existing and reasonably foreseeable, already planned and approved facilities, the project opens the door to, and enables, the virtually unconstrained demand predicted in the approved master plan.
The DEA obscures the noise impacts the project will have on special population groups, including the minority and special ethnicity neighborhoods.

First, the DEA is internally contradictory with respect to environmental justice. On the one hand, it acknowledges that the combined populations within the four consensus designated places potentially impacted by aircraft noise resulting from the project, specifically the Paine Field Lake Stickney CDP, the Picnic Point North Lynnwood CDP, and the Cities of Mukilteo and Everett, they are 7.7 percent Asian, and 6.5 percent Hispanic or Latino.

On the other hand, it states that there are no known special population groups within the project area.

Further, by combining and averaging the populations over the four CDP's the DEA does not disclose the actual proportion of Asian and Hispanic populations in the Paine Field Lake Stickney CDP where the proportion of Asian and Hispanic population is far greater. For example, within Lake Stickney Census Tract No. 418.04 the Hispanic population is 11.69 percent. And within census tract 418.06 the Asian population is 8.41 percent.

The DEA fails to address the potential
environmental justice impacts of the project in the Lake Stickney area. Moreover, the DEA was circulated only in English, and no public hearings are planned in the Lake Stickney area.

The DEA does not inform the public that further environmental review under Washington State's Environmental Policy Act, SEPA, will be required before the project can be approved.

One more. The NEPA process requires dissemination of environmental review information to the public, and an opportunity for public participation. The DEA makes no mention of SEPA, and as published is likely to lead the reader to believe that environmental review for the project has been completed. The final EA, or final Environmental Impact Statement, should inform the public that SEPA review will be necessary before the project can be approved and implemented, and that the public will have subsequent opportunity to comment on the SEPA review.

In conclusion, because the project is far wider in scope and its impacts commensurately greater than portrayed in the DEA, it is Mukilteo's position that a full Environmental Impact Statement is required to explore these and other potential impacts.
And thank you very much.

MR. DRISCOLL: You've just witnessed a court reporter's nightmare.

You submitted that in writing?

MR. MARINE: I did.

MR. DRISCOLL: Number 23.

24.

MR. QUAST: Good evening. I'm John Quast, 15714 75th Place West, Edmonds, Washington.

I'm sure my comments were included in a previous speaker's but I'll add a couple more.

I reviewed the DEA and I was not able to determine the qualifications of the company and the methodology used to produce it, the DEA. I believe these qualifications and the standards and methodology should apply -- should be public information.

In particular, where have these methodologies and standards previously been applied? How successful were they in accurately predicting noise levels and environmental impacts? And without this data, I don't think the conclusions can be drawn accurately. And I think they're suspect and without merit. And in the process of doing that, if they're included in the final draft, I think the public
should also have an opportunity then to comment on those. Thank you.

MR. DRISCOLL: Thank you, sir.

Number 24.

Number 25. So 22 and 23 are not here. Then Number 25.

MR. LORD: I'll get started. I'm Randy Lord, and I'm from the City of Mukilteo also. 10703 Marine View Drive.

I'm on the Mukilteo City Council, and I'm actually the council president. And I'm going to try to find different points so we can make sure we take care of all of them.

The first one I wanted to ask is the definition of deficient LOS, level of service, for roads. You guys are describing that all the activity that you had that could possibly bring a hundred thousand passengers to our area, including both west and east side of the airport, won't have an impact on the roads.

I will tell you that right now we are fighting deficiency problems for our cities. The Mukilteo Speedway is will cluttered right now with traffic. So I need to know what your definition of deficient is, because we're fighting that problem right now.
We're approaching a level F failure of one our major intersections, forcing us to possibly spend six million dollars to find an alternate road. That's going to affect us. So I believe that's a strong mistake that's being made that does need to be considered. Please understand that.

Second one is that I also am an air force brat, and I lived at an air force base most of my life. And when you walk into the air force bases, there's the sound of freedom, which is the jets flying over. And I fully understand that. And I fully agree. That's what my father did. But I did not choose to live next to an air force base. I know how loud they are, and I don't want them here.

So people who think you get used to it, you do because the nerve endings in your ears stop hearing them. That doesn't mean it's a good thing.

Finally, the Everett Planning Department came through and described that, yes, this is an exciting project, but it's highly risky. And in theory, why should we bother investing all this money and all this risk and destroy all that is good for a possibility that something may come through? I would rather the county invest all of our money to help us to get a better transit system to go all the
way up with the light rail. Because unless you want to fly to Las Vegas, Portland, or Spokane the other 95 percent of all the flights that you will have to take in your life will probably be out of Sea-Tac. So we will be fighting that problem. And I will be taking a shuttle at three in the morning, because I don't fly to Spokane. I tend to fly other places. So for people who think it's a good idea to have two or three flights just to go to two or three cities, they're forgetting all the pain and agony that's created elsewhere.

And finally, got to make sure I get them. I'm an engineer also, but Councilman Stoltz, who I share a chair with, he described it from a scientific term. And I think I would like to help the audience understand what DNL really means when it comes to noise. They average a massive impact over a large period of time. And the best way I can visualize it, I punch you in the nose, and I came back a day later, but because I hit you only once, I get to pretend that I didn't touch you at all, and it averages out that I just touched you. So you should be happy, it's just like I didn't do anything wrong to you at all, and I can come back and punch you in the nose again.
So DNL is a metric that gets the FAA what they want. And when you measure the wrong thing, you get the wrong results. So thank you.

MR. DRISCOLL: Thank you.

Number 26.

The same rules apply, no clapping, cheering.

MS. EYRE: I'm Wanda Eyre, E Y R E. I live in Everett.

MR. DRISCOLL: You're going to have to speak up.

MS. EYRE: I live in Everett.

Two points. I couldn't tell if the use of other airports alternative included the new Sound Transit link and station to Sea-Tac. If it didn't, it needs to.

The other thing I'd like to say, and others have said this, but I figure the more times people say this, the higher likelihood there is that it will be responded to adequately. The underlying assumption of almost all the numbers in the draft EIA is the initial low level of activity. However, FAA regulations require that an airport with a proposed role accept any and all activity literally twenty-four seven. Given the EA's purpose with respect to changing airport's role, I submit that the EA is invalid. Thank you.
MR. DRISCOLL: Thank you, ma'am.

27.

MS. ZUNKEL: Kathleen Zunkel, 2095 Mukilteo Speedway.

And as a court reporter, I was feeling your pain. We'll talk to Joe later.

As a court reporter practicing in this county for over 20 years, I have reported the sworn testimony of thousands of people, including expert witnesses. Expert witnesses are paid to give opinions regarding various cases based on their particular expertise. And all too often, unfortunately, their testimony is screwed -- whoops, I knew I would do that -- their testimony is skewed to favor the attorney who's paying for said testimony.

In one particular case, I listened to a UW Ph.D explain why a man who had consumed 20 beers within an hour and then got in his car and ran over a seven-year-old girl walking home from school killing her was not legally drunk at the time because of the man's particular size, girth, and body mechanics. The Ph.D had lots of graphs and fancy calculations to defend his scientific opinion, but thankfully the jury didn't buy it. We all know that consuming 20
beers in an hour gets a person hammered.

This draft EA reminds me of that 20 beers in
sober testimony. The draft EA looks at all the
minimum levels, and thus minimal ensuing impacts
regarding commercial flights out of Paine Field, but
does not at all address the maximums. It's always
only about ten measly flights a day with nice quiet
aircraft. While we know that once Paine Field opens
to commercial flights it must accept any and all
activity, and any time of the day, according to the
FAA. Where are these impacts addressed in the EA?

The FAA needs to launch a study with real facts
based on real impacts to real communities that back
right up to the airport, lie directly under its
flight path, communities that will suffer real
consequences in the years to come.

We're not buying fancy graphs and calculations
that don't realistically include the future growth
of commercial air at Paine Field.

Thank you.

MR. DRISCOLL: Thank you.

Number 28.

I need your name.

MR. LIDA: My name is Dan Lida. I live in
Edmonds, and my address is directly under the flight
path of Lake Union Air Service. And before you applaud, I kind of like it. And I challenge any of you who applauded a few moments ago to tell me what Mr. Marine said. I have a daughter who can talk fast, but she can't hold a candle to him. I used to tell her to talk slower because I can't hear as fast as she can talk. But I will have to read the testimony at a later date.

It's almost surreal to me that we're even discussing whether to have airplanes in an airport. It seems pretty academic that you build airports for airplanes. And I have followed this situation in the papers and a lot of the discussion about quality of life, but you can't have quality of life, I submit, without employment. And here we have these people in our community and our officials that represent us telling us about the quality of life. But when it comes to Boeing locating jobs here, they want that. But those jobs are what brings the quality of life up. And so it's as if we're slapping Boeing in the face by saying, let us build the airplanes so we can have a good quality of life, but don't ever let them come back here. And to me that's kind of hypocritical.

And I think that it's also offensive to me that
they use public money to sort of stonewall this situation without any hope of probably stopping it. I read in yesterday's paper that somebody testified here that a real estate man told him that there would be no commercial airplanes in Paine Field, therefore he bought some property on that basis. Well, I have a car I would like to talk to him about.

And so if we want the jobs that go with airplanes, we should at least be acceptable to airplanes. And I was living on the Speedway in the early 30's with my parents, or the late 30's, I think it was, when Paine Field was built. And we used to sneak through the woods and watch the blasting and the work going on. And that's a long time ago.

And whoever thought that you would search for a location to settle in when an airport is not exactly hidden from view.

So I'm totally in favor of it.

And the small aircraft, the acoustics of their propellers are far noisier. And this hasn't been mentioned. The noise lasts a lot longer than a jet.

MR. DRISCOLL: Thank you, sir.

Number 29.
MR. BRADFORD: Good evening. I'm Captain Denny Bradford. I'm an FAA designated flight examiner on the 747 400 aircraft.

The conversations this evening, I'm a long time born in Everett resident. 1802 Bailey Avenue behind Harborview Park.

The noise abatement issues seem to be the main focus of our conversations this evening. The airport at Paine Field is very similar to John Wayne Airport in Orange County where special noise abatement procedures are designed. Noise monitoring equipment surrounds the airport. Fines are issued if noise violations are made. The pilots are trained and examined by people like me to make sure there is compliance.

Paine Field has a special advantage in the fact that we have Puget Sound, so these noise abatement procedures can be modified and most of the noise dispersed over the water. Thus I think that we are over exaggerating the noise impact.

The current Dream Lifter 747 400 modified aircraft has one of the noisiest footprints of any aircraft ever designed that's categorized as a stage three aircraft. This aircraft flies in and out of Paine Field multiple times each week at all times of
the day and night from the Orient bringing aircraft parts to the 787. These aircraft that we're concerned with are much quieter.

I also agree with the fact that when a manufacturer based in Chicago has their products manufactured in Everett, it supplies us with jobs. The purchaser of these products are not permitted to the Everett market. It would appear to me as a long time resident of Everett, that this is an affront to the Boeing Aircraft Company.

I believe that the use of this airport for commercial basis will bring jobs and convenience to Snohomish County. Thank you.

MR. DRISCOLL: Number 30.

MR. BERRY: Steve Berry, and I live in southwest Everett. And I'm not an experienced orator, and a little bit nervous being up here today, but I appreciate the brain power and the respect of the people that have shown up here today to represent the community, the business interests, and all those things.

And I wear many hats in my life. I run the Berry family, and I'm a local resident, so I have concerns that are probably conflicting; because I'm also a local business owner that is very close to
Paine Field. And so I have things that have kind of torn me in different directions about the development and the commercialization of air traffic into Paine Field.

In addition to that, I would say the things that I've learned as a small business owner over time is that often times when you get many groups into -- or the more groups you get into addressing a solution, the more likelihood that you are to provide a solution that works for everyone. So when I see here today the folks represented, I think of the brain power that's represented and the ideas and ingenuity that in general I come to find fond in America. And that we can probably find a way that the concerns and the things brought up today that would be addressed.

So although this is my first experience to go through such a process, and I'm sure it is for many of the residents here, I know, and I see examples of people that have gone through it before.

And like the individual that was just up here, and there are also examples around the country. So that is what -- I guess I didn't come up here to say anything super profound. I don't have a bunch of data to back up things, other than to say, probably
like many people in the audience, I'm curious. I want to know what's going to happen. I want to hear what else is going to be communicated to us, and how the public and those concerns are going to be kept in the loop and addressed.

MR. DRISCOLL: Thank you, sir.

Number 31.

MR. CROSBY: Dave Crosby. My address is 26-108 Street Southwest, that's in South Everett.

I'm 58 years old. I'm a resident who has lived in various locations within five miles of Paine Field virtually my whole life. I own my own business. I bring several hundreds of thousands of dollars per year into this area through my job, which is based on lots and lots of travel.

To the FAA and Snohomish County, I'd like to say, good job on tuning up Paine Field and making it an asset to our community. I worked with the airport for a couple high school summers shortly after Paine Air Force base was turned over to the county and became Snohomish County Airport. I flew small planes out of Paine Field for 20 years, and kept a plane of my own there for 17 years. I watched as the Boeing buildings were built and the airport was developed into the major community asset
that it deserved to be.

I'd like to commend the people who make the rules that say if you take federal money for your airport, you need to make that airport available for aviation interests, such as airlines who want to use it. I like those rules because I'm a taxpayer, and I want my money's worth.

The Environmental Impact Statement for this airport would have had significantly different results when Paine was an air force base and was really loud and really smokey. Fairmont Elementary School classrooms used to come to a complete standstill during takeoff of military jets, but back then local residents seemed to have a larger modicum of common sense and accepted it.

To the not-in-my-back-yarders at this meeting, especially those from Harbor Point, I will say simply, Paine was there first. If you're smart enough to buy a $400,000 house, or $200,000 condo, then you're smart enough to do some research on the possible future impacts of building or buying near an airport the size of Paine.

It really irked me when Paine started handing out noise impact brochures to us private pilots with a chart that showed virtually all of Harbor Point as
noise sensitive. In my youth I used to ride motorcycles through the forests, gullies, and habitat that you have chosen for a home. Paine was there long before your home was. You have a lot of gall to move in and then try to change the rules.

MR. DRISCOLL: Number 32, please.

MR. SKOTDAL: My name is Andy Skotdal. My address is 2707 Colby Avenue in Everett.

The only land that me or my family owns around Paine Field is a home about 1800 feet from the northern outer marker of Paine Field main runway. The home is directly under the flight path of aircraft approaching Paine Field. And in the late 70's and early 80's when a substantial amount of environmental analysis was performed on Paine Field, I can remember having to cover my ears when planes flew overhead because they were so loud. It was virtually impossible to hold a conversation with the person next to you. Today this is not the case. I can hear just fine, and there's no need to cover my ears any longer.

The previous Environmental Analysis performed on Paine Field in the 70's and 80's and 90's establishes noise and traffic thresholds that are greater than those envisioned today. Commercial air
service at Paine Field has been sufficiently studied, and there is no need for additional analysis.

It's not the case of introducing passenger aircraft into an area where no similar aircraft currently land. The second largest passenger airplane in the world already land here on a regular base.

Nor is this a case of building complete new facilities as envisioned by the FAA in Hailey, Idaho. Save for a small terminal like Hailey, Charlottesville, North Virginia, or even a moderately larger one like the one in Boise, Idaho, the major infrastructure is already in place. And if anyone would care to look at those airports, they would notice none of them has adult interest businesses around them, and both Hailey and Charlottesville have homes all around them. Charlottesville in particular has some extremely nice horse breeding estates around the airport. These airports contribute to traffic in a minimal way, and I've never seen a back-up or traffic problem as a result of these airports.

The comments requesting more analysis I fear are simply a stall tactic to delay a worthwhile project
in the hopes that a future election or funding change, or some new piece of legislation will create a mechanism to kill the project. This document is sufficient for the FAA and local governments to act favorably on the introduction of passenger service.

Multiple studies have been performed over three decades, and there is no need for more analysis. Our home is under the flight path, and I support the use of Paine Field for commercial air service.

MR. DRISCOLL: Thank you, sir.

Number 34.

Number 33.


And I can tell you, I've had to make calls in the middle of the night because of the noise coming out of the airport.

And those engines are up against blast zones. They put these flights in there and they fly at night, we're going to hear it.

And the traffic right now, I can tell you, is pretty heavy. And it will just get worse.

Now I live near, I work on Paine Field, and I fly out of Paine Field. It's getting worse. Okay.

That's all I got to say.
MR. DRISCOLL: Thank you, sir.

Number 35.

MR. HAWKINS: My name is Bill Hawkins, and I live on Intercity Avenue here in Everett. And I’ve lived in relatively close proximity of the airport for at least 22 years.

When I walked in here tonight and I looked at the data posted, first thing that hit me like a ton of bricks was recently, at least in the world that I live in, and maybe some of these other people do, the EPA listed CO2 as a pollutant. Now I know that may be new for a culture addicted to burning carbon fuel, but it is listed as a pollutant. And there’s no evidence it was considered at all in these numbers tonight.

So what I would like to see is I would like to see this carbon footprint for this project. It’s totally missing in the assessment.

The other thing that I noticed in Everett as I’ve lived here all the years, and maybe someone else has witnessed this too, is the sewer rates keep going up. And I know that you’ll be increasing, with passenger services, the de-icing. And I’m told it’s not significant at this service level, but there is the possibility that the de-icing, if more
carriers than these proposed come in, will add more
and more pollutants to the City of Everett sewer.
And we've got a soap factory recently, and we've got
a rate increase someone says associated to that. So
I want to see what the impacts of pollutants in
terms of things like de-icers and other runoff will
have on our sewer facilities.

Now I have a friend who's spent his life as
acoustic engineer. He taught acoustics in
architecture and so on. He used to work for the
Boeing Company. He was on board the first 747 that
ever flew doing acoustic measurements. And we had a
long discussion about the DNL. And I agree what the
gentlemen said about punching you in the nose once a
week and then we average it over the weeks, I've
never touched you. He told me that's why it was set
up. It was set up so that the very rich that own
airplanes can give their noise to the people who
live close to airports. So that's a fact of life.
One percent of the wealth in this country owns 40
percent of the nation, and the rest of us just have
to live off that.

But the other point I want to make is I don't
know, I didn't have a chance to look at the
Environmental Assessment on the terminal itself, but
we just have a radical change in the need for security. And whether or not somewhere along the line in the future we're going to have to put a million dollar scanner in here or some other type of technology in order to allow people to board airplanes safely, and I don't know if that's in the impact of the cost of this to the community, but I think somewhere along the line, even though these taxes come down through the federal system, they're still paid out of our collective pocket. So I would like to see some assessment on that.

And with that, I would add one other thing. Is a thank you for all the work you've done. Happy New Year.

MR. DRISCOLL: Thank you.

Number 36.

MS. ADALAY MOHAMMED: My name is sister Adalay Mohammed. And I've had a small service in Everett, this is my tenth year in Everett. And I'm here to get more information to take back to my community and encourage them to become a little more involved in this issue. Everything that I've been reading has, since the end of last year and the beginning of this year, points to a lack of security within the airport systems. And I was wondering, because of
the information that you already shared, you've answered so many of the questions that came up again and again about, oh, almost every issue, the noise level seems to be frightening to most people, and having to give up anything at all to have the airport at Paine Field.

I'm concerned about the security, because a lot of scrutiny comes through the Moslem community when things happen like that. And I was wondering if there were a guarantee that there would be more better security measures for this new airport, and it can become a gateway to better security throughout the world.

MR. DRISCOLL: Thank you.

Number 37.

MR. SUGAMELE: My name is Terry Sugamele. I live at 747 Washington Avenue in Mukilteo.

I'm a retired Boeing engineer fellow, by my former company, where I spent 35 years, 25 years at the Everett facility. All my work has been on the 747 and 767 since their beginning, with a yellow card flight status, which means that you could fly on hazardous flights for the Boeing Company representative. My specialty was defining the vibration and sonic fatigue requirements for these
airplanes. Boeing by law cannot voice negative comments about increased commercial flight activity at Paine Field. But I can.

Delivering airplanes takes multiple flights, depending on Boeing and/or customer pilot's squawks. Now a squawk is a negative event, which means that the Boeing Company has to correct it or have the customer approve it.

I've spent thousands of hours both on the ground and in flight, in the air, flight testing Boeing airplanes. At any time within the normal daytime hours, between the curfew at the beginning and curfew at the end.

And I might add that because of my activity, the Boeing Company has paid many $10,000 fines to the Paine Field authorities because we exceeded the curfew in order to deliver airplanes. We had balance problems, we had vibration problems that had to be addressed.

This activity -- pardon me. This activity that I experienced can be very intrusive to Paine Field operation, because when we're done, we go up in the air. Take off. Or we balance an engine and continue on, depending on the result.

Adding more commercial flights during the day
would be an additional burden to the Boeing Company.

MR. DRISCOLL: Sir, a gentleman just gave you his time, so you have an additional three minutes.

MR. SUGAMELE: Community needs Boeing, not South Carolina.

MR. DRISCOLL: Number 38.

MR. ELLIS: Hi. My name is Ken Ellis, Ph.D psychologist. Practice in Edmonds and Marysville. Address, 4327 Forest Drive Everett, Washington.

I live about three miles or so north and west of north and east of Paine Field. And I moved here about four years ago from Grand Rapids, Michigan, where I lived right under the flight path to the Gerald R Ford International Airport. And I always enjoyed watching the planes go over. It never bothered me. It was not a stressor.

I hear people worrying about property values and all that, and I just didn't see that. I lived in an executive neighborhood. I had a much larger house out there than I have here due to difference in prices. But it seems to me that people that talk about mental health damage, mental health damage is when we have excessive stress repeated over time. And I can tell you that whatever stress for most people of an airplane going over is what is in their
own mind. They're creating it because they're angry and they're not adjusting to life.

We need economic strength. We need the ability to fly in and out of something more convenient than going all the way down to Sea-Tac. So I think that a lot of the complaints are really about people who are afraid of something that's going to mean change, or something that's new, rather than dealing with the fact that we have opportunity.

And this is a typical problem with any kind of infrastructure development, which I see, being a fairly newcomer here, it's very important and very useful to the county as a whole.

So I'm very much in favor. I do not see these impacts, noise being a significant issue for the mental health of the community.

MR. DRISCOLL: Thank you.

Number 39.


Are there any FAA officials here tonight?

MR. DRISCOLL: Well, they aren't going to answer questions.

MR. PASKUS: That's all I'm asking.

MR. DRISCOLL: Rhetorical question, I presume.
MR. PASKUS: Exactly.

MR. DRISCOLL: Go ahead.

MR. PASKUS: You are seeing a presentation that has been repeated over and over again in small cities across this country. And before I finish tonight, I have a deal for all of you.

I don’t how many of you have visited Bellingham, but we have a great city. Gateway to the San Juans. A really nice place to live. The problem is we do have an airport. In fact Bellingham is home to one of the fastest growing airports in the country based on FAA enplane passenger counts. Whatcom County cannot support air service without the majority of Canadians and your county’s residents. I don’t who to thank, Allegiant, Horizon, Alaska Airlines, the FAA. Do I thank the port officials? If you hike Mount Constitution, walk trails on Chuckanut or along Lake Padden or by the bay, you hear aircraft taking off in Bellingham Airport. You hear it from within Shuksan Middle School where my daughter goes in the gym, to Western campus in classrooms. You cannot escape it. What a deal.

I would also wager that the Environmental Assessment for Bellingham is far more sensitive to air service. I mean, we have bald eagles that nest
across the street from the airport. And the flight pattern for Bellingham shoots right up the Nooksack where they feed. Seeing an MD 80, let alone hearing it, and for some smelling it as it takes off over the bay against the backdrop of Lummi Island and Orcas to me, to be honest, makes me sick.

So, unfortunately, I support the preferred alternative. So I approve the Environmental Assessment that you see here, not because I will use the airport, but because Paine Field will take the demand away from Bellingham.

I would also challenge the FAA to look into why Bellingham has air service and Everett does not, when Snohomish County is three times the size. Is it the politics of money? Is it because Bellingham homes were purchased with FAA grants to promote an industry that assumes it can't accept failure. Is it because seven airlines have left or gone bankrupt in Bellingham? Do we keep dumping millions into an airport that may lose its match to either Abbotsford, B.C. or Everett.

I'm here to say that if Paine Field does not offer air carrier service, then Bellingham has lost the qualities of life that the people in this room are trying to save and protect.
I love Bellingham. And, again, I challenge the FAA to rethink so the so-called capacity, the demands, and the placement of airports nationwide can be reexamined.

One follow-up to add to the FAA, Alaska Airlines, Allegiant. It's a new world where we recognize that there are alternatives to transit, especially when protecting a community's quality of life, and when our environment is at risk.

I believe the FAA needs to change the laws allowing communities to govern their airports the way they want. Frequency, numbers of flights --

MR. DRISCOLL: Sir, your time --

MR. PASKUS: And the deal is, I'd love for these folks in Mukilteo to support me and not use Bellingham Airport. Thank you.

MR. DRISCOLL: Thank you.

Number 40. 41. 42. 43.

MR. BARNHART: Greg Barnhart, 3102 115th Place Southwest, Everett.

I have double reason to be speaking. I wasn't going to talk tonight, but I'm impacted twice. My address is under the flight path coming in over by Silver Lake. I have no complaints.

I own property in Mukilteo. I have a business
in Mukilteo. I am on the end of the runway south end. They do skim the trees coming over my property. I had a height restriction when we built two years ago, so I do know what it's like to have an airplane come over, especially the Dream Lifter. They rouse the limits. But that's what I accepted to have.

There's been two major issues depicted here tonight, the EA study and the Boeing Company. The EA study everybody says is flawed. If it's flawed, start fixing it. That is what we have to work with. That is the American way. If you don't like it, go out and fix it. This is what we have to work with. Let's live with it, folks.

The Boeing Company. Everybody cries about the Boeing Company. Face it, they're going to produce less planes here. It's a fact. What are you going to do when they don't have planes to produce here? You have them at the airport collecting derelict airplanes like they have at Warring air force base in Maine when they closed it.

Tax basis. I pay taxes. The businesses in this town, in this community pay the taxes. It's that way anywhere you go. When they do an annexation, the businesses determine whether they're going to
annex. Where I live, we were not annexed in the City of Everett because we did not have a tax base. No business. This City of Mukilteo depends on the Boeing Company and the businesses in this area to have a tax basis.

Yes, they make noise. Yes, we should accept what the EA has given us and bring commercial flights into Paine Field. Thank you.

MR. DRISCOLL: Number 45.

MS. VINCENT: Heather Vincent. And I live at 9727 18th Avenue West.

And if you notice on the map here, I live right here. I'm in the DNL zone.

MR. DRISCOLL: So you live east of the runway.

MS. VINCENT: I live right there. And I live in the DNL zone. That's what you call it. And I can tell you that when they do the engine testing, it completely shakes my kind of -- it wakes me up in the middle of the night. I've called Paine Field and complained saying, you're running your engines after 11:00. I can't sleep.

It also hears a very high pitch noise. So it does -- I have -- also sleep with a white noise, and it's higher than my white noise machine. That's how loud it is. So basically it does affect the quality
of your life when you can't sleep and you got to go
to work the next day.

So I have a few questions. The slide that you
represented on this EA report, it says that aviation
activity study includes most -- it showed 2008, the
activity, and it showed the activity of 2000, or
when this would take place in 2010. But isn't most
of the activity that now is at the airport small
aircraft?

And wouldn't, if you increase the amount of
airplanes, won't it increase the noise level?
Because it's got to. It's got to increase the noise
level. And now you're just comparing it to small
aircraft instead of larger aircraft that is going to
come in with being a commercial airline or airport.

Also, where is all the people going to park for
this? I mean, how are you going to subsidize all
parking? Because with Boeing, they don't have any
more parking. There is so many people that work
there.

And so I just -- there's going to be more
traffic within the area. I can definitely -- I see
the traffic every day. When Boeing gets off work,
you can see it in the morning and the evening when
the shifts go in and out. And with more traffic in
the area, it can barely sustain the amount of traffic for the Boeing workers now.

And for people in Mukilteo, which some of our relatives live there, they bought their property on the assumption that this was not going to be a commercial airport. And so it will decrease. It will decrease property values.

And I know in Sea-Tac Airport, has there been any studies that their property value totally decreased when it became a commercial airport? So I am opposed against this action. Thank you.

MR. DRI SCOLL: Number 44.

MR. DUBUQUE: Donn Dubuque, D U B U Q U E from Snohomish County. My family was here before this was a state. So I've got it on just about everybody.

This gentleman here I think has been living in Mukilteo, and I live in Mukilteo on West 45th Street one block. I'm basically almost the closest you can get to a residential area to the airport. Period. I think there's one row of homes about one block up on the other side of whatever it is, 525 or 526 is closer than me. But they have also got a huge sound wall barrier that they built that, you know, gives them the airport.
But I have lived next to airports my entire adult life all around the country including, I might add, the biggest airport in the United States, which I still believe is Dallas Fort Worth as far as land mass. I know that Atlanta I believe has the most traffic now. But I’ve lived at Dallas Fort Worth on both sides of that airport for long periods of time.

But I’ve also, because of my job, I’ve used air travel extremely heavily. I wish that years ago I had started counting up the amount of miles that, when I was in the military and worked for the federal government and then got out of all that and started doing silliness for real, is just amazing. But basically I had to live near airports because I would get calls in the middle of the night to get the first flight out the next morning to go fly to who knows where around the world to fix stuff.

I came here several years ago, about ten years ago, to do a project for a company, and before -- I basically send most of my money to the drug companies now, and I’m right at the edge of my drug deals, I’m starting to shake now -- but at any rate, trying to get in and out of the Everett Mukilteo area down to Sea-Tac to fly out anywhere is a nightmare.
And if anybody thinks that this particular Puget Sound community is ever going to get their act together like someplace like Portland that has a beautiful high speed rail system, it's not going to happen. It just isn't going to happen. Just watching this place over the last ten years, you can't get people to agree to go when the light turns green, okay, the stoplight. It's not going to ever happen. So forget about any kind of high speed rail.

The lady who was up here a little bit ago said she hears the engine testing at night. Most of that is doing high speed runs up and down the runway that Boeing is doing. If you do not have one of these, you do not know what is going on that airport. And I stayed here after I got sick because I wanted to stay near the airport that I grew up next to.

And this is a scanner, by the way. If you do not have a scanner, you do not understand what airplane was taking off and what they're doing at that particular point in time, then how can you say this is too noisy, or that is too noisy for that particular deal.

MR. DRISCOLL: Your time is up. Thank you.
MR. HAZELZET: I'm guy Hazelzet, 10921 127th Avenue Northeast, and that's in Lake Stevens.

I'm a Snohomish County resident. I pay the taxes here. And, first of all, I was raised in the flight path of Long Beach Airport. And Environmental Impact, or Environmental Assessment was done many times on Long Beach Airport. In fact McDonnell Douglas, when I was growing up, had its heyday there and were flying in and out, very similar to Paine Field.

They did establish commercial aviation in there, and they restrict it. And to this day it's still restricted to the amount of flights that can come in and out of the airport based on an Environmental Assessment that is done every few years.

They have a curfew there. They're very strict on the curfew in the morning and in the evening. So I believe it can be done.

As far as Orange County Airport that the gentleman alluded to, some of the highest property values in the state are in the flight path of that airport, which is Corona del Mar and Newport Beach. And they do have noise abatement there, and it works very effectively. I've flown in and out of there many times.
I would use this airport as far as myself 30 to 40 times a year to fly to Spokane, which now I do the drive from Lake Stevens to Sea-Tac round trip about 30 to 40 times a year. I'm just one person. If you multiply it times a hundred thousand, like the Environmental Assessment says, right now that's a lot of people taken off the highway, and a lot of noise and pollution taken off the highway to sit on a plane like the Q400 which flies very efficiently back and forth to Spokane and is a quiet airline.

So I just wanted to voice my opinion as far as the Environmental Assessment goes. It works for me. And productivity-wise, it would be great and better quality of life for me.

And you can restrict the flights here. It is possible to do. They do it in Long Beach very effectively. So thank you.

MR. DRISCOLL: Number 49.

MR. DEMMERT: Steve Demmert, 3814 Serene Way. GPS, one point five miles directly south of three four left on the threshold.

Now there was a discussion earlier about the altitude of various airplanes. When an airplane is coming in to land, doesn't matter whether it's a 747
or Cessna, they're on a three degree glide scope. So altitude is the same.

And some of these points here, just like other people here, and I want to make one statement. I'm an Alaska native, raised with the utmost respect for the elderly, and I do respect the elderly that have spoken here this evening. But I find it interesting that the only individuals who said that the noise near the airport doesn't bother them are the elderly. So, perhaps, you know, those of us who are a little younger and our hearing is not diminished quite as much are a little more affected by it.

MR. DRISCOLL: How do you define elderly?

MR. DEMMERT: I feel like I'm on the cusp. Like I said, I'm one point five miles south of three four left, and hear a lot of the aircraft coming and going.

They do average out. Day like today, I don't think anything came in northbound. Nothing took off southbound that I heard.

There have been days when Q400's have come in, and it's very rare for a Q400 to come in to Paine Field on my observation. When they come in, they are very noticeable. Q400's on final, with the props at full pitch and the turbines screaming is
not a quiet engine.

Nobody has made comment on the MD 83. Those are not quiet aircraft.

In regards to the people that get up at two to catch a flight at five, we're talking about flights to Spokane and Portland here. If you're getting up at two to get to the airport at five to get to Portland, why aren't you driving? It takes, that time of day, 35 to 40 minutes to get from Everett to Sea-Tac. Factor in parking, or getting out of Shuttle Express, dealing with baggage, dealing with security, waiting to board, boarding, taxiing out, on and on, getting to the other end, you might as well drive to Portland. You're in your own car.

I have three seconds left, so I'll make it very quick. We've spent billions, with a B, on a third runway at Sea-Tac. Millions to expand and update the terminal. And millions to get light rail up and running, with talk of expansion. Sea-Tac is currently operating at least 30 percent under capacity. Regardless of your assessment here today, which numerous people have pointed out deficiencies in, scheduled flights at Paine Field are just not necessary.

MR. DRISCOLL: Thank you.
Number 50. 51.

MR. TINGWALL: Doug Tingwall, T I N G W A L L. And I live here in Everett. And I just wanted to start out by saying, whether you agree with the proposed undertaking or not, it's really very heartening to see all the citizens taking part in the democratic process. That's great.

Now I want to start out by saying, I've got nothing against airports or airplanes. My dad and my brother were both pilots.

I'm also not opposed to additional flights, commercial or otherwise, over my house, provided that they're the noiseless and emissionless variety that a few of the previous commentators have alluded to.

And I don't particularly like having to wake up at 2:00 in the morning to have to take a flight out of Sea-Tac. I'm not a jet setter by any means, but I'd ask you and my fellow citizens here, what is the lesser of two evils, having to get up a few times earlier in the morning, or deal with increased air traffic over your house on a daily basis?

As for economic benefits, what are the economic benefits of this undertaking to all the homeowners who live in the areas around Paine Field?
Also, I don't suspect that, as much as I enjoy living here in Everett, that it's going to become the next resort destination of the jetsetters.

As for the EA, I feel that the document is inadequate on a number of levels. Now the current document only addresses impacts over a six-year period. My question would be, what will these impacts be over a longer period? You know, usually some of the EIS's I've seen, you're looking at periods of 20 to 50 years.

Also, none of the figures, at least in the copy that I got off the internet, have the flight lines illustrated. And how current is the data, or has it been recycled from earlier documents?

The EA is inadequate in addressing the cultural resources. The area of impact is extremely restricted and doesn't take into account indirect impacts of increased flights on flight paths over historic districts in Everett and the traditional lands of the Tulalip Tribes.

Now the archeological potential with the project footprint I feel hasn't been adequately addressed. And it has kind of the distinct ring of circular reasoning to it. And the reason being is if you look at the FAA letters to the affected tribes, they
state that a cultural resource inventory has not been prepared due to previous ground disturbance.

And yet if you look at the text on page C 15, it states under the subheading, cultural resources, that no archeological or cultural resources or cultural sites, excuse me, are known to exist in the project area. My question is, how was this determined if no archeological assessment was conducted?

Now, there's no corroborating documentation that's present in the EA that addresses the concerns raised by the Department of Archeology and Historic preservation representative in his letter to the FAA dated December 16, 09. Does previous disturbance mean that all Holocene-aged sediments have been stripped down to the level of basal glacial till in the project area, or that the proposed ground disturbance won't extend beneath the level of modern fill?

MR. DRISCOLL: If you have further comments, you can submit them in writing. Thank you.

Number 52.

Anybody else who still has a number, then you can come on down.

MR. WILHELM: Michael Wilhelm, I'm a resident of
Mukilteo.

The EA, to me it's kind of a working of numbers. And the way I see it is an airline industry, any airline has been through this several times and knows how to work the numbers so they can present a best-case scenario for themselves, knowing that once they get in the door, then big government will help them push their agenda, whatever that may be, obviously to make money and to not really care too much about the environment and all of that, because the idea here is to make money.

So my concerns are that the workings of the EA, as far as the increase flights that are going to happen over the next five, ten years, or even immediately once this thing is approved, that there's nothing from what I've read that prevents the airline industry from expanding themselves to the limits of the capacity of Paine Field. And there's nothing that addresses that. And I'm very suspicious that the airline industry has worked their initial numbers to stay underneath the threshold that would cause a higher degree of environmental impact study. Thank you.

MR. DRISCOLL: Thank you, sir.

Number 53.  54.  55.
MR. RHODEN: Chuck Rhoden. I live at 525 Rhodora Heights Road, Lake Stevens.

But I am a resident of Paine Field as I am a co-owner and resident CEO of Global Aerosystems, an engineering services company that has not only the Boeing Company as its client, but also Mitsubishi, Kawasaki, Bombardier and Air Bus North America, among a few others.

My company chose Paine Field because of two things. It was an airport where aeronautical engineers could practice their profession in a surrounding that is conducive to aeronautical thought, activity, and operations; and, two, there was a lot of vacancy at Paine Field.

Now my company has been there for close to four years. And during that four years, I've watched five businesses, three in my building, exit Paine Field because of either economic distress in their industry or in their part of the aerospace industry, or relocation to the Seaway Business Complex.

But tonight I've heard a lot of perspectives, and it's been an interesting evening for me, and I thought I would give you a little bit of my perspective.

I too am an aeronautical engineer and have
practiced this for nearly 40 years. I have a company that employs about 85 engineers today. We've been up higher than that, down a little lower than that. But Paine Field to me is an asset that this County has long shunned in some cases, and almost in all case ignored.

It's an opportunity to have a thriving community that small businesses like mine, and large businesses like the Boeing Company, or Safran, or Contour Aerospace, or Electroimpact, or Pacifica Engineering, that we can move goods and services very conveniently in and out of our business complex. This is important to a community. Because I agree with this gentleman over here, your profession and what you do for a living says a lot about what type of quality of life you have and what type of quality of life you can provide your children and your grandchildren.

Paine Field has some of the most unique things around it that people take for granted or don't even know about. I might add, the Future of Flight Museum, which is an outstanding facility, and the Boeing Tour Center, the restoration center for the Museum of Flight in Seattle, the Paul Allen Heritage Flying Collection, which is also a museum. But it
also has a lot of vacant property and a lot of capability to not only absorb some commercial flights in and out, which I believe will help offset the reduction in general aviation activity that has been taking place since the peak of general aviation activity in the late 50's and early 60's, general aviation will continue to decrease as we go forward. But I'm here very much a proponent for Paine Field. And as a business owner and a citizen of Snohomish County since 1957, I encourage more commercial aircraft at Paine Field. Thank you.

MR. DRISCOLL: Thank you, sir.

Number 56.

MR. SHARMA: Jagdish Sharma, and my address is 15815 30th Drive Southeast, Mill Creek, Washington. And I agree with Joe Marine's facts and data about this EA and everything. EA, the studies are, my concern is also that it has initial and short-term perspective. What happens after ten years when it becomes a commercial airport? And there's a lot of airlines and big airlines out there then definitely, if you include social impact and the quality of life, air quality. And take Sea-Tac, you have hotels and motels and massage parlors, and maybe the prostitution will come here as we see on the Sea-Tac
area. So these are my concerns.

And definitely, I'm a Boeing engineer, 30 years.
And there's a big improvement in the noise. But
still, Q400 and these other airplanes, they are not
as bad as what we are talking for the 787, 777 and
the commercial airplanes. So definitely it will
also have an impact on the flight path, definitely.

Thank you very much.

MR. DRISCOLL: Thank you, sir.

57.

MR. HIKEL: Good evening. My name is Ted Hikel,
I'm a 41 year resident of City of Lynnwood. I'm
also a member of the Lynnwood City council serving
in my 19th year.

When I first came here Paine Field was in its
transition state. I remember the rotary airfare
used to be there every year, and it was a lot of
fun. It was a great place to go.

But the problem now is not the fact that there's
an airport there that could be used for something,
it's what is it going to be used for.

We were promised for 30, 40 years that there
would be no commercial aircraft coming in and out
every day of Paine Field. And so cities like
Lynnwood put their regulations in place that said
you don't have to do the extra noise barrier in the houses or in the schools because there won't be those planes flying over constantly every day.

I'm surprised and shocked, because as an elected official we are required to be honest with the people who we represent. And when we talk about four or five flights a day max, but your own figures, which are in the Herald, which I presume are correct, show that in a few years we're looking at 22 flights a day. And escalating from that, I could presume.

There's a financial part to this. Yes, there are going to be some people who will benefit financially. People who don't have to spend the gas to go to Sea-Tac Airport. People who have businesses there whose property won't increase in value.

But the other side of that coin is what's going to happen to the homes and businesses in South Snohomish County? We represent about a third of the population of this county. If our home prices go down, and we are told by reasonable real estate people that's what's going to happen, that means the county taxes are going to go down. So all those NIMBY's -- can I say, the NIMBY's are folks that
live in Arlington and Marysville and Lake Stevens and Everett who are just thrilled with the idea of this airport, they're the NIMBY's. Not in their back yard, but it's okay to be in our back yard. They will also have to be paying the extra taxes that the county will have to raise because our property values have decreased. And I don't think they're thinking about that.

The noise level, you have not one item in anything I have seen to deal with noise mitigation. We have 12 schools that are directly affected by this. We have multiple public buildings.

If we had our choice, we would like to see a new airport built someplace where there would not be that kind of impact on an established community. But if there is that kind of impact to take place, there are effects, especially financial effects for this county which are going to have to be figured in in deciding whether we go ahead with commercial flights at Paine Field. Thank you.

MR. DRISCOLL: Number 58.

MR. EMERSON: I'm Dave Emerson, I live in Harbor Point in Mukilteo.

I'm in complete agreement with the councilman that just spoke.
A couple other things, too. When I was a kid I used to come over to Harbor Point and ride mud bikes and do all that kind of thing. It was something we did. But they rezoned it. They made it into residential. The MRD said it's going to stay that way. So I moved into Harbor Point under those conditions, and expect to remain that way. It was an agreement that was not only verbal, it was written at the time.

The other thing that we need to address tonight is the business community. I haven't seen a whole lot on the income outgo on that anywhere in any of the data or the figures. We do have a bunch of small businesses. In fact four people before me spoke about how well and how nice it is to be a small business in the airport and in the airport area.

The city staff person that spoke, the third person, noted that there was 20 businesses that would move out if they couldn't get commercial air services. Well, in Mukilteo there is over 500 businesses. In Everett there's got to be at least ten times that. That's over 5,000. They have selected 20 that said that they would move out. I believe that if we keep it a local airport, that we
would get more small businesses in here that can use
the airport on a daily basis without having to wait
for commercial traffic to clear, or other parameters
that will be put on their on local businesses.

We have a new business - and I just spaced the
name - up on Beverly Edmonds Road that came in about
six months ago and opened up for 600 employees.
Corey Company. We got all kinds of these businesses
that are looking at this area, but if they cannot
get free access to it, then we're kind of tied in a
knot as to what kind of business we bring here.

The airport, if it turns commercial, will have
people, stewardesses, flight attendants, mechanics.
None of those people that service those aircraft
make a large income like the engineers and the
architects and the people that would use this as a
fiber optic community. It is a very fiber optic
community, by the way, to use this as a base for
their facilities. Those people don't make a very
large income. Therefore they can't afford a very
large house that we've already built under the
existing circumstances in Mukilteo. They can't
afford that $400,000 house. They're going to be
looking at the $300,000 house. Our house values
will go down, because they want to live near the
airport.

No matter how we look at it and how those terms are put together -- and I plan on doing this in writing in a very thorough way -- we see depreciation in houses, we see depreciation in lower income jobs which, again, brings lower taxes to the county. And those people that live outside of this area are going to wind up paying more taxes to offset the lower taxes that you're getting out of this area if it turns commercial. Thank you.

MR. DRISCOLL: Thank you.

That's the last sign up. Are there any members of the audience who did not sign up who want to testify now? One.

A PERSON ON THE AUDIENCE: Having given up my proxy, do you still have time for me to speak?

MR. DRISCOLL: Let's get this gentleman first. You follow him, and then we'll close up.

MR. HURSTON: Mark Hurston, I live in Bothell. H U R S T O N.

MR. DRISCOLL: You're going to have to speak louder.

MR. HURSTON: Mark Hurston, H U R S T O N. I live in Bothell, right across I-5.

And very frequently we have what I call
unexplained events almost in terms of, I'm joking a little bit, but we have strange aircraft occurrences that seem to happen when the cloud layer is extremely low. I don't understand fully how it all works for them, their flight paths and things like that. But so many times when the cloud layer is low, it will rattle the chandelier on my dining room table area. And I've tightened down the glass globes, I've made sure all the fittings are right. I know it's connected correctly. And the vibration coming through my house is enough to make it still vibrate.

My concern is that additional flights and so-called not-so-quiet planes will make it so that that will be almost unbearable. And I was only able to read about four placards in, but about four or five placards in there on the left of your display it said that, I think it was 2016 there would be 8,000 more events that could occur per year. And if I'm looking at 365 days and 8,000 events that could occur, I've got a lot of vibration in my chandelier. I know it's kind of a joke, but realistically I think the noise issue and the quality of life issue are two big things.

But there's so many other very accurate comments
about people who have thoroughly analyzed the draft ES that needs to be redone somehow, or somehow needs to be correctly reviewed in order to ensure that all aspects are being taken into account.

I have some concerns over loss in property value for both the commercial aircraft starting up at Paine Field, but then I have those same concerns over Boeing leaving and going to South Carolina. And then all of those people who used to work at Boeing plant leaving causing a glut.

So I think the quick way for me to summarize is, I don't want the extra noise. We bought in an extremely quiet neighborhood as you approach the Mill Creek hill in order to avoid some of these issues.

And now to see the continued tendency for governmental agencies, right now it's FAA and Snohomish County, causing both an extremely tight grouping of homes, and allowing for such great noise from planes in Paine Field, you're going to turn South Snohomish County into a little bit of a ghetto style situation, which some people have, I guess, talked about Sea-Tac in that way to a certain extent.

I think this needs much further review and a
complete environmental impact study that will allow for all of the things that have been said here to be reviewed. Thank you.

MR. DRISCOLL: Thank you.

You're the final witness.

MR. SNIVELY: My name is Kevin Snively, 100101 Montana Road, the corner of Montana Road and 100th Street Southwest, one mile due east of the airport.

All of the airport east side, to my knowledge, drains to Swamp Creek. Swamp Creek drains to the Sammamish Slough, and the Sammamish Slough drains to Lake Washington. We have endangered species involved. Period.

I'm an asthmatic. I'm a lifelong asthmatic. I'm living in a house my father built in 1954. So I lived there when the airport was an interceptor base. I went to sleep to the sounds of the afterburners when the intercepters were on the flight line. And the noise is not an issue to me.

But Puget Sound is out of compliance for air quality. And you're telling me that your pollution isn't going to have an impact. You have to mitigate that pollution. I'm sorry. There's just no way around it. I get sick physically with my asthma when Puget Sound air quality goes into the yellow
zone based on the PSAQ, or whatever they call themselves today, guidelines. I must work. I take extra medicine. You have to mitigate your pollution.

The roads are insufferable as they are. I don't know whose estimation is you don't have to mitigate traffic. But if you're going to move in, you're going to have to pay for that, too. And if we have to put a tax on every seat sold at that airport, you're going to pay for it. Thank you.

MR. DRISCOLL: Thank you.

Okay. Again, I want to emphasis, you can submit your comments until February 5. The address is here if you need them.

I want to thank you members of the audience. You've been easier than I was anticipating, and I appreciate it.

I'm going to let Mr. Dunkelberg just close in stating what's the next phase of the process.

MR. DUNKELBERG: Thank you. The next public hearing we're going to have will be the 21st of this month.

Subsequent to that, we'll have comments submitted up until February 5, as stated. At that time we will compile all the comments and we will to
each comment that's submitted electronically, verbally, or in writing. And we will then prepare a draft -- a final Environmental Assessment which will be presented to the FAA. They then at some point will make a decision on that document. And whatever that decision is, we don't know right now, but if the decision is favorable, then as one of the gentlemen said, it then has to go through the SEPA review process at the county. Thank you.

(End of the hearing.)
Please note: Responses are ordered by speaking order in the hearing.

Mark Avlon

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?), 6-4 (What are the quality of life impacts), 7-1 (Use of DNL), and 9-1 (What is the impact upon property values?).

Paul Robertson

Thank you for your comments.

Lanie McMullin

Thank you for your comments.

Allan Giffen

Thank you for your comments.

Ken Crane

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), 4-5 (Other modes of transportation may be better alternatives), 6-4 (What are the quality of life impacts?), and 7-1 (Use of DNL).

Kevin Stoltz

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), 7-1 (Use of DNL) and 7-5 (Proposed commercial fleet mix).

Herald Quinby

Thank you for your comments. Please see general responses: 1-10 (Scope of the EA analysis for future operations and passengers), 4-1 (Alternative airports should be used), 4-5 (Other modes of transportation may be better alternative), 9-1 (What is the impact upon property values?), 10-2 (Air quality conformity) and 10-4 (Would there be an increase in fuel dump/fuel smell/residue?).

Jerry Gruol
Thank you for your comments. Please see general response: 5-5 (Study areas).

**Vern Ashbrenner**

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), 2-1 (MRD document), 3-3 (Concerns that only half of the activity was considered), 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 7-1 (Use of DNL). Also, please see the following individual response to comments.

**Questioned validity of current airport activity**

A number of comments questioned the validity of the existing activity levels (2008) reported in the Environmental Assessment (EA). The existing operations levels are reported by the Airport Traffic Control Tower and adjusted for operations when the tower is closed (9 p.m. to 7 a.m.). Other comments requested information including type of aircraft. This information is included in the fleet mix in Appendix D, Noise Analysis. Comments also questioned why the footnote in Table D1 conflicts with operational data for commercial air traffic in Table B1 that indicates there are air carrier operations and that those differences could affect analysis for noise and air quality. Air carrier is a broad category that includes both unscheduled air carrier operations and proposed scheduled commercial service with aircraft that can have over 60 seats. Therefore, although Table B1 indicates that there are already air carrier **type aircraft** operations, there are no **scheduled commercial service operations** at the airport. From an air quality/noise standpoint, analysis compares the change of the “Without Project” conditions to the “With Project” conditions containing scheduled commercial service. The existing conditions include the noise/air quality impacts from existing, unscheduled air carrier operations. Currently, since there are no scheduled commercial service operations at the Airport, the With Project analysis focuses on the addition of scheduled commercial service.

**Natalia Horton**

Thank you for your comments.

**Tom Subitch**

Thank you for your comments.

**David Ezunkel**

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), 2-1 (MRD document), 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 6-3 (What are the project benefits?).
Fred Taucher

Thank you for your comments.

Glen Bachman

Thank you for your comments.

Mark Bhend

Thank you for your comments. Please see general responses: 4-1 (Alternative airports should be used), 5-1 (Existing aircraft noise concerns) and 10-4 (Would there be an increase in fuel dump/fuel smell/residue?).

Mike Mascio

Thank you for your comments.

Pete

Thank you for your comments. Please see general responses: 3-5 (Why was 2016 selected as the future year?), 6-4 (What are the quality of life impacts?), 7-9 (What are the health effects of noise?), and 9-8 (What are the health and quality of life effects associated with the project?).

Mike Stuart

Thank you for your comments. Please see the following individual response to comments.

Military Noise/Cumulative Impacts

A concern was brought up about the military flights out of Whidbey Naval Air Station, fighter jet traffic, and its inclusion in the noise model. The military flights operating at Paine Field were included in the Integrated Noise Model (INM) for both the existing and future conditions and with/without project conditions.

Joe Marine

Thank you for your comments. Please see general responses: 1-9 (Role of the consultant and their qualifications), 1-10 (Scope of the EA analysis for future operations and passengers), 1-13 (Additional study should be conducted), 1-14 (What is the role of the State Environmental Policy Act (SEPA) and why is it not mentioned in the EA?), 1-15 (EA did not reflect the opposition of the community), 2-1 (MRD document), 2-3 (Airport Master Plan), 3-5 (Why was 2016 selected as the future year?), 3-11 (What is the capacity of the terminal?), 3-12 (What is the relationship of the two terminals), 3-14 (What actions will require additional environmental review), 9-3 (Socioeconomic impacts), 9-6 (Environmental Justice), 10-1 (Greenhouse Gas/Climate Change), 10-2 (Air quality conformity), and 11-8 (Cumulative impacts).
John Quast

Thank you for your comments. Please see general responses: 1-8 (Adequacy of FAA guidance and use of FAA guidance), 1-9 (Roles of the Airport/Consultant and their qualifications), 5-1 (Existing aircraft noise concerns), 7-1 (Use of DNL), 7-6 (What are the existing and future noise impacts), and 7-14 (What is the Airport Influence Area).

Randy Lord

Thank you for your comments. Please see general responses: 6-3 (What are the project benefits?), 7-1 (Use of DNL), 7-14 (What is the Airport Influence Area), and 8-1 (Traffic analysis).

Wanda Eyre

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), 4-1 (Alternative airports should be used), 4-4 (Relationship between capacity at other airports and Paine Field), and 4-5 (Other modes of transportation may be better alternatives).

Kathleen Zunkel

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), 3-5 (Why was 2016 selected as the future year?) and 3-14 (What actions will require additional environmental review?).

Dan Lida

Thank you for your comments.

Denny Bradford

Thank you for your comments.

Steve Berry

Thank you for your comments. Please see general response: 1-12 (Adequacy of public involvement and release of the Draft EA and Public Hearings).

Dave Crosby

Thank you for your comments.
Andy Skotdal

Thank you for your comments.

Michael Wilson

Thank you for your comments. Please see general responses: 5-1 (Existing aircraft noise concerns), 7-6 (What are the existing and future noise impacts), and 8-1 (Traffic analysis).

Bill Hawkins

Thank you for your comments. Please see general responses: 1-1 (Why can’t the County limit or restrict operations?), 7-1 (Use of DNL), 10-1 (Greenhouse Gas/Climate Change), and 11-7 (Security: terrorist attack). Also, please see the following individual response to comments.

Deicing

In response to comments regarding deicing, 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. It does not filter into the groundwater or other bodies of water before being 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 because of the amount of glacial till that overlies the area. Therefore, there are no expected water quality impacts resulting from the increase in deicing operations from the commercial aircraft operations. Increases to sewer rates for the City of Everett are not expected as a result of the Preferred Alternative.

Adalay Mohammed

Thank you for your comments. Please see general responses: 11-7 (Security: terrorist attack).

Terry Sugamele

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

Ken Ellis

Thank you for your comments.

Matt Paskus

Thank you for your comments. Please see general responses: 1-1 (Why can’t the County limit or restrict operations?), 1-12 (Adequacy of public involvement and release of the Draft EA and Public Hearings), and 11-9 (How does this project compare to the commercial operations at Bellingham Airport?).
Greg Barnhart

Thank you for your comments. Please see general response: 1-9 (Roles of the Airport/Consultant and their qualifications).

Heather Vincent

Thank you for your comments. Please see general responses: 3-7 (Parking capacity), 1-10 (Scope of the EA analysis for future operations and passengers), 6-4 (What are the quality of life impacts?), 7-3 (Noise analysis methodology), 7-5 (Proposed commercial fleet mix), 8-1 (Traffic analysis), and 9-1 (What is the impact upon property values?). Also, please see the following individual response to comments.

**Questioned validity of current airport activity**

A number of comments questioned the validity of the existing activity levels (2008) reported in the Environmental Assessment (EA). The existing operations levels are reported by the Airport Traffic Control Tower and adjusted for operations when the tower is closed (9 p.m. to 7 a.m.). Other comments requested information including type of aircraft. This information is included in the fleet mix in Appendix D, Noise Analysis. Comments also questioned why the footnote in Table D1 conflicts with operational data for commercial air traffic in Table B1 that indicates there are air carrier operations and that those differences could affect analysis for noise and air quality. Air carrier is a broad category that includes both unscheduled air carrier operations and the proposed scheduled commercial service. Therefore, although Table B1 indicates that there are already air carrier type aircraft operations, there are no scheduled commercial service operations at the airport. From an air quality/noise standpoint, analysis compares the change of the “Without Project” conditions to the “With Project” conditions containing scheduled commercial service. The existing conditions include the noise/air quality impacts from existing, unscheduled air carrier operations. Currently, since there are no scheduled commercial service operations at the Airport, the With Project analysis focuses on the addition of scheduled commercial service.

Donn Debuque

Thank you for your comments.

Guy Hazelzet

Thank you for your comments. Please see general responses: 1-5 (Mitigation), 7-11 (Call for noise curfew/activity restrictions), 7-12 (How are the potential noise impacts compatible with surrounding residential land uses?), and 8-2 (Why weren’t diverted trips accounted for?).
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. 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.
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.

Mitigation

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

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

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

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

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

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

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

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

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

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

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

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

1-7 Who will make the final environmental determination?

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

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

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

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

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

1-9 Roles of consultant and their qualifications

Some comments questioned the role of the consultant in the Environmental Assessment (EA) process and the qualifications/potential for bias of the consultant to complete NEPA analysis. The Federal Aviation Administration (FAA) often delegates the preparation of Environmental Assessments (EAs) to the Airport Sponsor for projects involving federal actions. Snohomish County, as the Airport Sponsor, retained a third- party, independent consultant to prepare the Draft EA. The third-party consultant was retained using the County procurement process. The
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 chose to operate many more flights and enplane many more passengers than what was projected in the Draft EA. A majority of the comments questioned the projected numbers of operations and passengers used in the analysis, indicating that they were too low.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

1-13 Additional study should be conducted

Some comments requested additional study and some comments specifically requested that the FAA prepare an EIS. Council on Environmental Quality (CEQ) regulations and FAA guidance require the preparation of 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 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

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

2-1 MRD document

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

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

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

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

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

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

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

Some community panel members viewed the MRD Document as an important, fundamental social contract between the County government and the citizens and south County cities. Some of these community panel members would like to see the MRD Document rewritten to more clearly state a dislike for scheduled passenger air service. Other community panel members believed the MRD Document has been overtaken by events and is no longer relevant. They believe the MRD Document is subsumed within Comprehensive Plans mandated by the State’s Growth Management Act and the County’s Airport Master Plan. They say the MRD Document informed the decisions made in the Comprehensive and Master Plans, and the Plans now describe the appropriate role of Paine Field.

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

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

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

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

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

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

2-3 Airport Master Plan

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Some comments also suggested that because a larger terminal is shown on the Airport’s ALP, the expansion of commercial service that might operate within this larger terminal is reasonably foreseeable and should be addressed in this EA. The purpose of an Airport Master Plan is to reserve space for potentially needed future facilities and the presence of a facility on an ALP does not indicate that demand for that facility is imminent or reasonably foreseeable. For
information regarding the forecasts used in the EA and the Airport Master Plan, please refer to General Response 2-3 and 3-13.

3-5 Why was 2016 selected as the future year?

Some comments stated that there would be growth beyond the Draft EA future year (2016) and that those future operations should be analyzed in the EA. The comments questioned why 2016 was selected as the future year and not additional dates further into the future.

Neither the NEPA nor Council on Environmental Quality (CEQ) regulations contain requirements about specific years to be evaluated. Rather, these regulations indicate that NEPA documents should address the reasonably foreseeable future (See General Response 1-11). The only reference to analysis of project impacts beyond five years in FAA environmental guidance is in Section 14 entitled Noise, of Appendix A in FAA Order 1050.1E. Paragraph 14.4g. states that “DNL (Day-Night Noise Level) contours, grid point, and/or change-of-exposure analysis will be prepared for the following: (1) Current conditions; and (2) Future conditions both with and without (no action) the proposal and each reasonable alternative. Comparisons should be done for appropriate timeframes. Timeframes usually selected are the year of anticipated project implementation and 5 to 10 years after implementation. Additional timeframes may be desirable for particular projects.”

The year 2016 was selected, in part, because it is the concurrency timeframe required under the Snohomish County Unified Development Code (SCC30.66B.155) as well as the timeframe required in accordance with the Clean Air Act General Conformity analysis years (based on the year of attainment/maintenance). The Draft EA considered noise impacts, in accordance with FAA guidance, for the first year of implementation, 2010, and for one future year, 2016, both with and without the proposed activity levels. There were a number of reasons that this timeframe was considered reasonable and appropriate. First, the information from both Allegiant Air and Horizon Air (Appendix A of the EA) was given to the County in two year increments, starting with year 1, and continuing with years 3 and 5. The forecasts of aviation activity (Appendix G) were based on these projections supplied by the airlines.

Due to the timeframe required to respond to comments on the Draft EA and changes in operational activity at the Airport during that time, the aviation activity forecasts and analysis years from the Draft EA were updated prior to the publication of the Final EA. In the Final EA, 2008 remains the base year or existing year, while 2013 was considered the initial year of commercial airline service, and 2018 was considered the future year for applicable environmental consequence analysis.

The growth rates beyond 2018 (if any) cannot be accurately predicted at this time. It is unclear whether or not the air service would be successful, or if successful, how quickly the air service would increase. Such increases would be dependent on area residents choosing to fly using commercial service at Paine Field (See General Response 3-1).
In response to concerns about future activity levels, the FAA requested that an additional appendix be prepared that identifies the operating capacity of the proposed terminal and the associated environmental effects. These issues are documented in Appendix P.

3-6 There should be an alternative future activity scenario

In response to comments received concerning alternative activity scenarios that might arise with the amended Part 139 certificate and commercial passenger terminal, an expanded analysis was prepared for the Final EA. This analysis in Appendix P, considers the theoretical maximum level of operations that could occur at the proposed terminal and the resulting environmental effect. For more information see General Responses 1-11 and 3-15.

3-7 Parking capacity

Some comments indicated that the EA failed to address parking needs of the passengers or that a future parking plan was not provided. The vehicle parking requirements associated with the proposed actions were identified using generally accepted airport planning practices and estimates of parking demands. The County determined that the existing number of vehicle parking spaces is adequate based on the anticipated passenger demand. As described on Page B.7 of the EA, Snohomish County shows a Uniform Building Code (UBC) requirement of 115 parking spaces for buildings similar in size to the proposed terminal and 141 spaces required for the terminal, the airport office, and Precision Engines (a private business located adjacent to the terminal and airport office) combined.

FAA Advisory Circular (AC) 150/5360-13 Planning and Design Guidelines for Airport Terminal Facilities indicates that between 1 space per 500 to 1 space per 700 enplanements is a general rule of thumb for estimating parking requirements for airports. Estimations using that guidance would equate to 160 to 224 spaces for the 112,000 enplanements in 2013 and 340 to 476 spaces for the 238,200 enplanements in 2018. FAA AC 150/5360-9 Planning and Design of Airport Terminal Facilities at Non-Hub Locations, Figure 6-2 indicates 340 to 440 parking spaces would be required to meet the need for the total 238,200 estimated enplanements in 2018.

There are currently six parking areas near the terminal as follows:

1. SE lot with 70 spaces dedicated to Precision and Aviation Technical Services (ATS) parking.
2. Adjacent to the existing C1/C2 terminal building with 30 spaces dedicated to airport staff and Precision parking.
3. Main lot with 177 spaces.
4. North lot with 102 spaces.
5. C4 lot with 35 spaces.

Of these six lots, only the last four can be used for air carrier passenger vehicle parking, enabling space for 364 cars, or 1 space per 308 enplanements in 2013 and 1 space per 654 enplanements
in 2018. Therefore, the available parking stalls are expected to meet the requirements for parking.

3-8 Increase in rental cars/rental car agencies

Comments were received about the use of rental cars or the increase in rental car agencies as a result of the proposed actions. Enterprise Rent-A-Car currently provides service at Paine Field to general aviation users of the Airport out of Building Number C84. Enterprise currently rotates cars to Paine Field from their downtown Everett lot as needed. No additional proposals or letters of interest from rental car agencies have been received to date. However, it is possible that additional rental car agencies might consider providing service at Paine Field if commercial service is initiated. If additional rental car facilities would be constructed, a review would be conducted at that time to determine if a modification to the Airport Layout Plan (ALP) would be needed, thereby triggering a federal action, which in turn would require NEPA compliance. Until a proposal for additional rental car space is received, such increases are not reasonably foreseeable.

3-9 Public transportation options should be considered

Comments suggested that more analysis of public transportation options, including bus service and light rail service, should be included in the alternatives chapter.

Local public transportation is technically not an alternative to regional air service. Improvements to local public transportation may, however, facilitate improved access to other airports like Bellingham or Sea-Tac. This alternative is addressed on page B.4 of the EA within the section “Use of Other Area Airports.” This alternative is also represented by the No Action Alternative because with the No Action Alternative, passengers wishing to travel by air are required to use other area airports and either use public transportation or private surface vehicle travel. With or without the proposed actions, neither the FAA nor the County can require passengers to access Paine Field or other airports using public transportation.

3-10 What is the capacity of the airport?

Some comments requested consideration of the maximum operational capacity of the airfield in the EA.

The capacity of the airfield system was analyzed and disclosed in the 2002 Airport Master Plan in accordance with FAA Advisory Circular 150/5060-5, Airport Capacity and Delay. The Annual Service Volume (ASV) is a reasonable estimate of an airport’s annual capacity (defined as the level of annual aircraft operations that would result in an average annual aircraft delay of approximately one to four minutes). According to the Master Plan, under current policies and practices, the Airport has an ASV of approximately 367,000 operations. In 2008, the Airport recorded approximately 143,722 annual operations, or approximately 39 percent of the calculated capacity. Given the dramatic decrease in general aviation activity at the Airport in 2010, the Final EA forecast (Appendix G) indicates the Airport only reaching 122,127 total operations by 2018 or approximately 33 percent of annual capacity. Consideration or analysis of
367,000 annual operations is not considered appropriate because neither the County nor the FAA has received any indication of interest to provide passenger service beyond that proposed by Allegiant Air and Horizon Air. Consequently, analysis of environmental impacts resulting from commercial operations and enplanement levels that are not reasonably foreseeable is considered speculative.

3-11 What is the capacity of the terminal?

Some comments requested consideration in the EA of the maximum operational capacity of the proposed modular terminal building expansion.

The capacity of the proposed terminal expansion was estimated and disclosed in Appendix K of the Draft EA, as described in General Response 1-11. Two estimates of terminal capacity were completed, the maximum capacity of the terminal and the realistic capacity of the terminal. The maximum capacity estimate was based on the capacity of the terminal’s gates and a range of departures per gate. Using a number of standard industry assumptions, the capacity range was determined to be between 252,000 to 401,600 annual enplaned passengers. In other words, 401,600 annual passengers boarding aircraft is considered the maximum theoretical capacity of the proposed modular terminal expansion. A more realistic capacity considers the mix of aircraft which might actually serve the Airport based on predicted fleet mix. In consideration of the mix of commercial service aircraft expected to use the facility, the realistic capacity of the modular terminal expansion was estimated at 294,000 annual enplanements.

To respond to comments concerning this issue, an analysis was added to the Final EA (in Appendix P) to examine the probable environmental effects associated with the maximum theoretical terminal capacity. See also General Response 3-15.

3-12 What is the relationship of the two terminals?

Some comments mentioned the two separate terminals shown in Figure B2 of the Draft EA and some of the comments suggested that the capacity of both terminals need to be disclosed. The base map used in Figure B2 of the Draft EA was the existing, FAA conditionally approved Airport Layout Plan (ALP) for Paine Field. Because the conditionally approved ALP included the recommendations of the Airport Master Plan, it showed a possible future passenger terminal. That terminal is conditionally approved because it would still require a NEPA review, separate from this EA. The Airport Master Plan forecasts indicated that a level of commercial service and enplanements might occur at Paine Field, at a level greater than what could be accommodated by the existing terminal building. Consequently, during the Airport Master Plan process, area and space were reserved for a future terminal and vehicle parking facilities to accommodate that commercial service activity. See also General Response 3-5.

Following receipt of requests from Horizon Air and Allegiant Air to initiate commercial service, the County decided that a terminal facility similar to the Airport Master Plan/ALP terminal was not warranted. An alternative to the Airport Master Plan terminal building was to provide a modular expansion of the existing terminal building. This is further described on Pages B.2 through B.6 of the EA.
Two terminals would not be constructed to accommodate the proposed service at Paine Field. Rather, the modular terminal expansion of the existing terminal would be constructed instead of the future passenger terminal considered during the Master Plan process and subsequently shown on the ALP.

3-13 What is a Class I Airport? Explanation of Federal Aviation Regulations (FAR) Part 139

Some comments requested clarification on the term Class I airport and an explanation of Federal Aviation Regulations (FAR) Part 139.

The FAA is required by 14 CFR Part 139 to issue airport operating certificates to airports that:

- Serve scheduled and unscheduled air carrier aircraft with more than 30 seats;
- Serve scheduled air carrier operations in aircraft with more than 9 seats but less than 31 seats; and
- The FAA Administrator requires an airport to have a certificate.

In 2004, the FAA revised FAR Part 139 to create four classes of operating certificates. Prior to this revision, certificated airports could have either a full or a limited operating certificate. Paine Field has had a full operating certificate since 1974. The certificate was revised in 2005 as a Class IV certificate because at that time there were no scheduled large air carrier operations at the Airport. Part 139 does not apply to airports at which air carrier passenger operations are conducted only because the Airport has been designated as an alternate airport.

Airport Operating Certificates (AOC) serve to ensure safety in air transportation. To obtain a certificate, an airport operator must agree to certain operational and safety standards and provide for such things as firefighting and rescue equipment. These requirements vary depending on the size of the airport and the type of flights available.

Class I airports include airports serving all types of scheduled operations of air carrier aircraft designed for at least 31 passenger seats (large air carrier aircraft). These airports currently hold an AOC and may serve any air carrier operations covered under Part 139. Accordingly, the operators of these airports must comply with all Part 139 requirements. The operating certificate at Paine Field would be changed to a Class I Airport as part of the proposed Federal actions assessed in the EA.

Class II airports include airports that currently hold a Limited AOC (or airports that have maintained an AOC after loss of scheduled large air carrier aircraft service) are either Class II airports or Class IV airports. Class II airports are those airports that serve scheduled operations of small air carrier aircraft and unscheduled operations of large air carrier aircraft. Class II airports are not permitted to serve scheduled large air carrier operations.

Class III airports are airports that serve only scheduled operations of small air carrier aircraft. As specified in the authorizing statute, airport certification requirements are not applicable to certain airports in the State of Alaska.
Class IV are airports that currently hold a Limited AOC (or airports that have maintained an AOC after loss of scheduled large air carrier aircraft service) are either Class II or Class IV airports. Class IV airports are those airports that serve only unscheduled operations of large air carrier aircraft. Air carrier operations are so infrequent at these airports that in the past, FAA only required them to comply with some Part 139 requirements. This continues to be the case, but new operational requirements have been added along with modifications to the Airport certification process and other administrative changes. The proposed actions in the EA include an approval to the FAR Part 139 operating certificate for Paine Field reclassifying the Airport from its existing classification as a Class IV airport to a Class I airport.

The change to a Class I airport would enable Paine Field to have scheduled air carrier aircraft operations at the Airport and Horizon and Allegiant could potentially increase operations beyond the projected number. However, if carriers other than Horizon and Allegiant would want to start service at Paine Field, additional environmental review would be required. For additional information on what other actions would require additional environmental review, please see General Response 3-14.

3-14 What actions will require additional environmental review?

Some comments asked if this would “open the door” entirely to unconstrained commercial air service actions and what would require additional environmental review prior to implementation. Such review could be one of the following levels of Federal environmental review:

- Categorical Exclusion (CatEx)
- Environmental Assessment (EA)
- Environmental Impact Statement (EIS)

Federal actions that may require further environmental review include:

- An operations specifications amendment request by another airline to begin service to Paine Field.
- An operations specification amendment to add a new aircraft type by an existing airline.
- Additional city destinations not currently covered by Horizon’s or Allegiant’s operations specifications.
- FAA funding for a new or expanded terminal building beyond that proposed in this EA or other airport facility development.

Additional service by either Horizon Air or Allegiant Air to the cities included in their request letters in Appendix A of the EA or service to other cities included in the airlines’ approved operations specifications would not constitute a Federal action and would not likely require additional environmental review unless FAA funding of further terminal expansion was required to accommodate that service or a new aircraft type was proposed.
ISSUE 4. ALTERNATIVES

4-1 Alternative airports should be used

Some comments requested that other airports, such as Sea-Tac Airport, be used in lieu of Paine Field. The airlines’ use of another airport other than Paine Field was examined as part of the Alternatives Analysis in Chapter B of the EA.

The use of other area airports by both Horizon Air and Allegiant Air in place of Paine Field is reflected in the No Action Alternative because Horizon Air already offers scheduled commercial air service at Sea-Tac Airport, approximately 30 miles south of Paine Field, and Bellingham International Airport, located approximately 74 miles north of Paine Field. Allegiant Air offers scheduled commercial air service currently at Bellingham International Airport. There has been no indication from these airlines that, should the proposed actions not be implemented, they would initiate service to any other area airport beyond those used today. Further, Snohomish County is not aware of any airport in the area with sufficient runway length that is specifically marketing itself to receive air carrier service other than the airports that Horizon and Allegiant are already operating as reflected in the No Action Alternative. Therefore, this alternative is not prudent and feasible, nor would it meet the purpose as described in Chapter A of the EA. The FAA cannot require airlines to choose one airport over another and therefore, this is not a viable alternative to the Proposed Action.

4-2 What is the relationship of the Proposed Project to WSDOT’s Long-Term Air Transportation Study (LATS)

Some comments asked about the relationship of the airline proposals and the EA to the recently completed study by the Washington State Department of Transportation (WSDOT) known as the Long-Term Air Transportation Study (LATS). LATS was a strategic planning effort based on the first comprehensive review of the aviation system in the State of Washington in over two decades. The result of the study was a set of realistic recommendations to address the state’s future aviation needs. One of the identified future aviation needs was additional airside and landside capacity for scheduled commercial air service. LATS recommended consideration of other airports in the Puget Sound Area with the potential to absorb future commercial capacity including Snohomish County Airport/Paine Field, Olympia Regional Airport, King County International Airport/Boeing Field, and Bremerton National Airport. However, the report qualified the recommendation that these airports could provide additional capacity by stating that the provision of commercial service at these airports is dependent on the interest of the airlines.

The planning process for the LATS included several regional public meetings in July 2008 and March 2009. Concern was expressed at these meetings and in written comments about the potential impacts of commercial service at Snohomish County Airport/Paine Field and at Olympia Regional Airport. Participants encouraged the Aviation Planning Council to explore non-aviation alternatives to relieve capacity for in-state travel and alternatives to airport expansion or new airport constructions. The purpose of the proposed actions at Paine Field is not to increase capacity or to provide regional capacity relief. Rather the purpose of the Federal action by the FAA is to evaluate the requests from both Horizon Air and Allegiant Air for the
FAA to amend operations specifications to allow scheduled commercial air service to Paine Field, to approve an amendment to the Federal Aviation Regulations (FAR) Part 139 operating certificate for Paine Field and the construction of the modular terminal.

4-3 What is the demand for this proposal and how does it fit with regional planning?

Some comments questioned whether regional demand was sufficient to support commercial service at Paine Field. Other comments suggested that additional regional planning and analysis of the regional demand for air service should be conducted.

The decision to initiate commercial service at an airport is a business decision by the airlines. Other than to ensure safety, neither the Airport Sponsor nor the Federal government controls where, when, and how airlines provide service. Should demand prove to be lower than that projected by the airlines, the airlines would likely choose to reduce the number of flights or cease service at Paine Field.

The purpose and need as identified in this EA is not to address the concerns related to regional demand/capacity. Rather the EA addresses the responsibility of the FAA and County in responding to the request of two carriers to begin service at the Airport. Per Council on Environmental Quality (CEQ) and FAA guidance, alternatives considered in NEPA process must address the underlying purpose or need.

In this case, the EA has considered the possible use of other airports (See General Response 4-1). However, as noted, if the carriers who are seeking to use Paine Field wished to serve other area airports they are not currently serving, they would make the request to those airports. These two airlines have identified demand for commercial air service at Paine Field and have consequently proposed to initiate service to accommodate that demand. In accordance with Federal grant assurances, the County has limited discretion to deny an airline request to operate at Paine Field. Since additional analysis on regional demand does not meet the purpose and need identified in this EA, it is not warranted.

For comments regarding the capacity at other airports, please see General Response 4-4.

4-4 Relationship between capacity at other airports and Paine Field

Some comments question the relationship between unused capacity at other airports and the proposed service at Paine Field. Comments suggested that expanded airline service at Sea-Tac Airport is a better alternative than the introduction of commercial service at Paine Field.

In regard to the recent "capacity" improvements at Sea-Tac, the third runway was not constructed to relieve or otherwise accommodate projected demand at Paine Field. The use of the third runway is separate from the purpose and need for the proposed action considered in this EA. The proposed Federal actions that are the subject of this EA respond to requests from two specific airlines to initiate service at Paine Field.
Regarding the “demand” for operations at Paine Field, the airlines’ use of another airport other than Paine Field was examined as part of the Chapter B, Alternatives Analysis, in the EA. As described in General Response 1-1, the FAA and Snohomish County cannot require an airline to serve a specific airport nor can they restrict an airline from a specific airport if the airport is a public use airport and the proposed aircraft can safely operate at that airport, regardless of which airport has more unused capacity.

4-5 Other modes of transportation may be better alternatives

Some comments suggested that either high speed rail, bus service, or other modes of transportation would be a better alternative to initiating commercial air service at Paine Field.

Use of public transit is discussed in General Response 3-9 and local public transportation is technically not an alternative to regional air service. Other modes of transportation were not considered in the alternatives analysis as they do not meet the purpose and need for the proposed Federal actions; the decision to take different forms or modes of transportation rests with the passenger, and under the current Federal regulatory process, neither the FAA or the County can require passengers to drive or take other surface modes (train or bus).

4-6 What does the term “Preferred Alternative” mean?

Some comments asked about the use of the term "Preferred Alternative."

Council on Environmental Quality (CEQ) defines the term Preferred Alternative as “the alternative which the agency believes would fulfill its statutory mission and responsibilities, giving consideration to economic, environmental, technical, and other factors.” While the Draft EA was prepared by the Airport Sponsor, it was closely coordinated with the FAA to ensure that the selection of the preferred alternative would address the FAA’s responsibilities under NEPA. The other alternatives reviewed in Chapter B of the EA were determined not reasonable as they did not meet the purpose and need. The Draft EA identified the draft Preferred Alternative so that the public and agencies would have an opportunity to comment upon that selection. A final confirmation of the Preferred Alternative will be made if the FAA accepts and signs the Final EA. The Preferred Alternative is also referred to as the Proposed Action, the project or the proposed project in the EA.

**ISSUE 5. AFFECTED ENVIRONMENT/EXISTING CONDITIONS**

**5-1 Existing aircraft noise concerns**

Some comments discussed the level of existing noise and its impact on quality of life. As stated on page C.16 of the Draft Environmental Assessment (EA), existing aircraft related noise exposure was defined in the EA through the use of noise exposure maps or contours prepared with the Federal Aviation Administration’s (FAA’s) Integrated Noise Model (INM), version 7.0a. The INM is a state-of-the-art, FAA approved software program used to model the noise exposure levels from aircraft operations and engine testing and produce contours of equal noise energy. These contours are presented using the 65 Day-Night Average Sound Level (DNL) noise contour metric where 65 DNL represents significant aircraft noise levels.

DNL metric measures the overall aircraft noise experienced during an entire (24-hour) day. DNL calculations account for the sound exposure level of aircraft, the number of aircraft operations and a penalty for nighttime operations. In the DNL scale, each aircraft operation occurring between the hours of 10 p.m. to 7 a.m. includes a sound level penalty to account for the higher sensitivity to noise in the nighttime and the expected further decrease in background noise levels that typically occur at night. DNL provides a numerical description of the weighted 24-hour cumulative noise energy level using the A-weighted decibel scale, typically over a period of a year.

Because DNL is a cumulative metric, while areas can receive single event noise levels above 65 dB, it is the average of these noise levels over the course of a year that provides for the 65 DNL contour. Although the FAA recognizes that noise occurs outside of these contours, the 65 DNL contour has been federally accepted at the level at which residential and other noise sensitive land uses are non-compatible with aircraft noise. Because the existing 65 DNL noise contour, shown on Figure C6, page C.18 of the EA, does not encompass any noise sensitive land uses (homes, schools, churches, etc.) the existing land use in the vicinity of the Airport is considered compatible with aircraft operations and aircraft generated noise under the federal guidelines.

See General Response 7-6 regarding the existing and future noise impacts.

**5-2 Current curfew is broken**

Some comments stated that the Airport currently operates under a noise curfew and that the curfew is already broken.

The County has a voluntary noise abatement program that discourages touch-and-go flights and repetitive training flights by jet, turboprop, and large propeller aircraft and requires air carrier aircraft with more than 30 passenger seats between 9:00 p.m. and 7:00 a.m. to receive prior permission from the Airport Director. The voluntary noise abatement program does not prevent aircraft from operating at the Airport and is not a mandatory noise curfew as suggested by some comments. The program requests those aircraft to have prior permission during those hours. Other aircraft are still allowed to depart/arrive at the Airport during those times without the request of prior permission. See also General Response 7-11.
5-3  Aircraft currently fly low and very close to houses

Some comments mentioned that aircraft already fly very low, and close to houses.

The height of aircraft on final approach to a runway or departure from a runway is controlled by the FAA. The standard traffic pattern altitude for small aircraft is 1,600 feet Mean Sea Level (MSL) while the traffic pattern altitude for large aircraft is 2,000 feet MSL. An airfield traffic pattern is a standard path followed by aircraft on takeoff or landing while maintaining visual contact with the airfield. Aircraft typically begin descending from pattern altitude in the downwind leg of the pattern when landing and on a 3-degree approach slope for the final leg of the pattern.

According to Title 14, Code of Federal Regulations, Section 91.119, *Minimum safe altitudes*; in general, there are minimum standards for operations of fixed wing aircraft (excluding when necessary for takeoff/landing). Over congested areas, an altitude of 1,000 feet above the highest obstacle within a horizontal radius of 2,000 feet is required, except for under take-off and landing procedures. Complaints on low-flying aircraft may be filed with the FAA, Office of Flight Standards, which monitors aircraft operations. Once the facts have been recorded, an FAA aviation safety inspector attempts to identify the offending aircraft operator. For more information on low flying aircraft complaints, please visit the following website: http://www.faa.gov/about/office_org/field_offices/fsdo/

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.
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*
**QUALITY OF SPEECH COMMUNICATION IN RELATION TO THE DISTANCE BETWEEN THE TALKER AND THE LISTENER**

- *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*[^6], 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. As 80 DNL conditions do not occur outside the immediate confines of the runway ends at Paine Field, no adverse vibration effects sufficient to result in damage or hazards would be expected.

7-11  Call for noise curfew/activity restrictions

Some comments called for a noise curfew, or for activity restrictions or other measures to mitigate the impacts of the proposed project and general noise at the Airport.

Because there are no noise sensitive land uses within the 65 Day-Night Noise Level (DNL) and there are no project-related effects that rise to the level of being significant, no mitigation measures are required. See General Response 1-5.

In terms of restrictions or curfews, the Airport Noise and Capacity Act (ANCA) of 1990 restricted local Airport Sponsor’s ability to impose a curfew or restrict activity at a public use airport. Restrictions or required curfews can put an unreasonable burden on interstate commerce (which is an area of regulation reserved for the Federal government), and also results in discriminatory regulation that violates the tenets of the constitution. Therefore, these types of restrictions cannot be put into place at a public use airport. However, in 1997, the Airport enacted a voluntary noise abatement procedure for large commercial aircraft with more than 30 passengers from 9 p.m. to 7 a.m., where aircraft cannot land or take off without receiving prior permission from the Airport. This procedure is voluntary since ANCA makes it impossible to impose a required curfew or activity restriction and it also serves as a safety measure to inform pilots of potential head to head conflicts when the tower is closed. See also General Responses 2-1 and 5-2.

7-12  How are the potential noise impacts compatible with surrounding residential land uses?

Some comments questioned how the potential project-related aircraft noise impacts can be compatible with surrounding residential land uses.

The FAA selected the use of the Day-Night Noise Level (DNL) noise metric, which is required for use in FAA NEPA documents. See General Response 7-1.

In accordance with the land use compatibility guidelines as defined in 40 Code of Federal Regulations (CFR) Part 150, certain land uses are compatible with various noise exposure levels. Most notably, residences, schools, churches, and other noise sensitive uses are compatible with noise levels less than 65 DNL (See Figure D7 in the Final EA). As shown in the Draft and Final EA, no noise sensitive uses would be affected by 65 DNL or greater noise levels. However, please see General Response 7-3 regarding people’s perception of noise.

7-13  What is the effect of the proposed project on parks?

Some comments stated that the proposed actions would have an impact on parks in the community.

Figure D7 of the EA shows land uses, including parks, relative to various levels of aircraft noise. Recreational uses of all kinds are compatible with noise below 65 Day-Night Noise Level (DNL). While there would be a project-related increase in noise to several parks in the airport vicinity, because no parks or recreation facilities are located in areas with noise exposure above 65 DNL, FAA land use compatibility guidelines indicate that the existing and future noise exposure with the proposed actions would be compatible with the anticipated noise. Therefore, no significant project-related impact to these parks is expected. For more information on noise see General Response 7-1.

7-14  What is the Airport Influence Area?

Some comments stated that the Airport Influence Area was designated by the local government to be an area appropriate for residential development, and that because of this designation, local officials had promised that commercial service would not occur at Paine Field.

The Airport Influence Area is defined in the Snohomish County General Policy Plan as “the property within the environs of the airport where land uses are either influenced by, or will influence, the operation of the airport in a positive or negative manner.” As described in General Response 5-5, the Airport Influence Area does not relate to the EA thresholds of significance or project area boundaries. The Airport Influence Area includes the Land areas within the Federal Aviation Regulations (FAR) Part 77 conical and approach surfaces within three miles from the ends of the Airport’s runways. The Airport Influence Area was not a consideration of the Mediated Role Determination.
ISSUE 8. TRAFFIC

8-1 Traffic analysis

Some comments were received questioning the validity of the surface traffic impact analysis.

The traffic impact analysis for the proposed action (“the project”) was performed in accordance with Snohomish County’s requirements for new developments and the interlocal agreements between Snohomish County and WSDOT and the City of Mukilteo. Snohomish County does not have an interlocal agreement with the City of Everett and therefore the City of Everett’s SEPA traffic impact analysis requirements for developments were used when determining the scope of analysis required for the trips generated by the project impacting City of Everett intersections. Reviewing jurisdictions generally require impacts to be analyzed during the typical PM peak-hour (within the 4:00 PM to 6:00 PM time period) and sometimes the AM peak-hour (within the 7:00 AM to 9:00 AM time period). Snohomish County, WSDOT, the City of Mukilteo and the City of Everett do not require analysis of impacts during Boeing shift-changes, peak ferry times, during holidays or other non-typical peak times. In addition, the daily count data along 128th Street SW (the closest Snohomish County critical arterial unit) shows that the 4:00 PM to 6:00 PM traffic volumes are the highest volumes during the day. Snohomish County and the surrounding jurisdictions do not have a weekend or holiday peak analysis requirement for this area since the standard weekday commuter peaks typically have higher traffic volumes than weekends in the study area and seasonal peaks are only for 2-3 months of the year.

The exact schedule for the flights is not currently known. Therefore, to analyze the highest impact scenario it was assumed that the peak trip generation of the project would occur during the existing weekday commuter peaks (7:00 AM to 9:00 AM and 4:00 PM to 6:00 PM). This analysis timeframe was scoped with Snohomish County during the traffic scoping meeting held on September 17, 2009. During the scoping process the distribution of trips and intersections/arterials that were required to be analyzed were also determined.

The peak trip generation of the project assumes that during a 60-minute period the following trips will occur:

- One Horizon Air turn, all passengers arriving and departing
- One Allegiant Air turn, all passengers arriving and departing
- A quarter of the 17 employees will arrive and a quarter of the 17 employees will leave

These Paine Field trip generation assumptions were compared to the operations at Bellingham International Airport, which serves Horizon Air and Allegiant Air. It was found that the time between a full turn for Horizon Air and Allegiant Air at Bellingham is closer to two hours. Therefore, the assumption that all of the Paine Field trips will occur during one hour is conservatively high.

The trip generation calculations for the proposed action were also compared to the analysis performed by The Transpo Group for the Bellingham International Airport, dated November 2009. The Bellingham International Airport analysis shows that the existing 1,100 daily
enplanements, which equates to approximately 385,000 annual enplanements, generates 131 PM peak-hour trips. In comparison, the proposed action is anticipated to have 238,200 annual enplanements in 2018, approximately 40% fewer enplanements than the existing annual enplanements at Bellingham International Airport. However, the anticipated peak-hour trip generation for the proposed action is 212 PM peak-hour trips, which are 60% more trips from 40% fewer enplanements. The trip generation calculations performed for the proposed action are also similar to the maximum peak-hour trip generation calculations that were calculated by Hirsh Associates in their analysis. The three comparisons of the peak-hour trip generation of the project show that the trip generation is conservatively high.

All of the trips generated by the proposed action (i.e. trips to and from the new terminal) were assumed to be new trips to the road system for the purposes of performing the level of service analysis. This assumption that all trips are new, despite the fact that it is likely that the project will divert some existing trips to Paine Field from Sea-Tac International Airport and Bellingham International Airport that are presently traveling along the local road system, represents the highest impact scenario. The diversion of trips on a microscopic scale, intersection by intersection, is nearly impossible to determine. However, the diversion of trips can be calculated on a macroscopic level, the level at which the VMT analysis was performed, since the macroscopic level analysis is performed over a large area and is not based on turning movement volumes at specific intersections. A diversion of trips has therefore not been included in the level of service analysis for the traffic impact analysis. This assumption means that all of the trips generated to the project are new to the analyzed intersections and arterials, which represents the highest estimate of the impacts of the project.

The analysis of the impacts of the development are based on the Snohomish County and City of Everett standards for all developments and the interlocal agreements between Snohomish County and WSDOT and the City of Mukilteo and City of Everett standards for all developments. WSDOT, the City of Mukilteo and the City of Everett evaluate impacts of a development based on the operation of intersections. Snohomish County evaluates the impacts of a development based on the operation of arterial segments. The level of service criteria for WSDOT, City of Mukilteo and City of Everett intersections is summarized in Table 1, which is consistent with Table 1 of the traffic impact analysis.
Table 1: Level of Service Criteria for Intersections

<table>
<thead>
<tr>
<th>Level of Service</th>
<th>Expected Delay</th>
<th>Unsignalized Intersections</th>
<th>Signalized Intersections</th>
</tr>
</thead>
<tbody>
<tr>
<td>A</td>
<td>Little/No Delay</td>
<td>≤10</td>
<td>≤10</td>
</tr>
<tr>
<td>B</td>
<td>Short Delays</td>
<td>&gt;10 and ≤15</td>
<td>&gt;10 and ≤20</td>
</tr>
<tr>
<td>C</td>
<td>Average Delays</td>
<td>&gt;15 and ≤25</td>
<td>&gt;20 and ≤35</td>
</tr>
<tr>
<td>D</td>
<td>Long Delays</td>
<td>&gt;25 and ≤35</td>
<td>&gt;35 and ≤55</td>
</tr>
<tr>
<td>E</td>
<td>Very Long Delays</td>
<td>&gt;35 and ≤50</td>
<td>&gt;55 and ≤80</td>
</tr>
<tr>
<td>F</td>
<td>Extreme Delays&lt;sup&gt;9&lt;/sup&gt;</td>
<td>&gt;50</td>
<td>&gt;80</td>
</tr>
</tbody>
</table>

The City of Mukilteo and the City of Everett have a level of service threshold of LOS D for the operation of their intersections. WSDOT has a level of service threshold of LOS D for intersections along SR-525 and SR-526 and a threshold of LOS E for I-5 interchange ramps.


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.

<sup>9</sup> 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 (miles per hour)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>Urban, Category II</td>
</tr>
<tr>
<td>A</td>
<td>Little/No Delay</td>
<td>&gt; 35</td>
</tr>
<tr>
<td>B</td>
<td>Short Delays</td>
<td>&gt; 28</td>
</tr>
<tr>
<td>C</td>
<td>Average Delays</td>
<td>&gt; 22</td>
</tr>
<tr>
<td>D</td>
<td>Long Delays</td>
<td>&gt; 17</td>
</tr>
<tr>
<td>E</td>
<td>Very Long Delays</td>
<td>&gt; 13</td>
</tr>
<tr>
<td>F</td>
<td>Extreme Delays</td>
<td>&lt; 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.
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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.
10-1 Greenhouse gas/climate change

Some comments requested that the EA address project-related greenhouse gas emissions and climate change.

In response to these comments and in close coordination with the Puget Sound Clear Air Agency, the FAA included the following discussion in the Final EA:

In January 2012, the FAA issued FAA Order 1050.1E Change 1 Guidance Memo #3 titled "Considering Greenhouse Gases and Climate Change under the National Environmental Policy Act (NEPA): Interim Guidance". This section addresses the effects of the proposed actions at Paine Field in accordance with the FAA guidance.

Of growing concern is the impact of proposed projects on climate change. Greenhouse gases are those that trap heat in the earth's atmosphere. Both naturally occurring and anthropogenic (man-made) greenhouse gases include water vapor (H₂O), carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), and ozone (O₃).

Research has shown that there is a direct link between fuel combustion and greenhouse gas emissions. Therefore, sources that require fuel or power at an airport are the primary sources that would generate greenhouse gases. Aircraft are probably the most often cited air pollutant source, but they produce the same types of emissions as cars. Aircraft jet engines, like many other vehicle engines, produce CO₂, water vapor, nitrogen oxides, carbon monoxide, oxides of sulfur, unburned or partially combusted hydrocarbons [also known as volatile organic compounds (VOCs)], particulates, and other trace compounds.

According to most international reviews, aviation emissions comprise a small but potentially important percentage of human-made greenhouse gases and other emissions that contribute to global warming. The Intergovernmental Panel on Climate Change (IPCC) estimates that global aircraft emissions account for about 3.5% of the total quantity of greenhouse gas from human activities. In terms of relative U.S. contribution, the U.S. General Accounting Office (GAO) reports that aviation accounts “for about 3% of total U.S. greenhouse gas emissions from human sources” compared with other industrial sources, including the remainder of the transportation sector (23%).

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12 All greenhouse gas inventories measure carbon dioxide emissions, but beyond carbon dioxide different inventories include different greenhouse gases (GHGs).
13 Several classes of halogenated substances that contain fluorine, chlorine, or bromine are also greenhouse gases, but they are, for the most part, solely a product of industrial activities. For example, chlorofluorocarbons (CFCs) and hydrochlorofluorocarbons (HCFCs) are halocarbons that contain chlorine, while halocarbons that contain bromine are referred to as bromofluorocarbons (i.e., halons) or sulfur (sulfur hexafluoride: SF₆).
and industry (41%). The 2012 USEPA nationwide inventory of greenhouse gas emissions, notes that aviation-related emissions represented about 2.1% of emissions. That report also found "Across all categories of aviation, CO2 emissions decreased by 20.6 percent (36.9 Tg) between 1990 and 2010."  

The scientific community is developing areas of further study to enable them to more precisely estimate aviation’s effects on the global atmosphere. The FAA is currently leading and participating in several efforts intended to clarify the role that commercial aviation plays in greenhouse gas emissions and climate change. The most comprehensive and multi-year program geared towards quantifying climate change effects of aviation is the Aviation Climate Change Research Initiative (ACCRI) funded by FAA and NASA. ACCRI will reduce key scientific uncertainties in quantifying aviation-related climate impacts and provide timely scientific input to inform policy-making decisions. FAA also funds Project 12 of the Partnership for Air Transportation Noise & Emissions Reduction (PARTNER) Center of Excellence research initiative to quantify the effects of aircraft exhaust and contrails on global and U.S. climate and atmospheric composition.

Aviation activity levels and airport development projects have the potential to both affect climate change and be affected by climate change. Changes to generation and/or use of natural resources such as air quality and energy supply can potentially affect climate change (e.g., by increasing the amount of greenhouse gases emitted), but projects can also be impacted by climate change (e.g., rising sea levels). At this point, there is no consistent scientific indication of when and how the climate will change.

Research has shown that there is a direct link between fuel combustion and greenhouse gas emissions. Therefore, sources that require power/fuel at an airport are the primary sources that would generate greenhouse gases. Aircraft are probably the most often cited air pollutant source, but they produce the same types of emissions as cars. Based on FAA data, operations activity at Snohomish County Airport, relative to aviation throughout the United States, represents less than 1% of U.S. aviation activity. Therefore, assuming that greenhouse gases occur in proportion to the level of activity, greenhouse gas emissions associated with existing and future aviation activity at the Airport would be expected to represent less than 0.03% of U.S.-based greenhouse gases. Therefore, emissions of greenhouse gases from this project are not expected to be significant.

As discussed above, changes to resource categories such as air quality and natural resources and energy supply can potentially affect climate change (e.g., by increasing the amount of greenhouse gases emitted), but projects can also be impacted by climate change (e.g., rising sea levels). At this point, there is no consistent scientific indication of when and how the climate will change.

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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:

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<tr>
<td>Ground Access Vehicles</td>
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<tr>
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<tr>
<td><strong>Year 2013</strong>*</td>
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<tr>
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</tr>
<tr>
<td>Ground Access Vehicles</td>
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<tr>
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</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$^{17}$ by the PSCAA states:

The agency, along with partners, continued to monitor the region’s air quality in 2007. Over the last decade, criteria air pollutant concentrations for some pollutants have fallen well below levels of concern in our jurisdiction. For example, levels of carbon monoxide, a pollutant that the region was formerly in nonattainment for, have fallen to levels so low that the Washington State Department of Ecology discontinued many of the monitors in 2006 in order to focus its monitoring resources on higher priority pollutants.

The same is true for the criteria pollutants sulfur dioxide, lead, and nitrogen dioxide. While the area enjoys improving air quality, we are facing new challenges. After more than a decade of attaining all federal standards, the agency faces nonattainment, potentially in multiple areas, for PM$_{2.5}$ and ozone. This is due to recent revisions to the national fine particulate and ozone standards to better protect public health.

... sites in Snohomish and King Counties are close to the daily fine particle federal standard. ... While efforts to reduce fine particulate emissions will be tailored to different areas, they generally target wood smoke emissions reductions, as the highest PM$_{2.5}$ levels occur in heating months when wood stoves and fireplaces contribute the majority of PM$_{2.5}$. (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$_{10}$ and PM$_{2.5}$. Since the project does not trigger any federal thresholds of significance for air quality for these pollutants, there are no significant impacts relating to the air quality under NEPA.

**10-6 Toxics/HAPS**

Some comments addressed hazardous air pollutants (HAPs) and their potential increase due to the proposed project. FAA guidance states:

- **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$_3$ 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...
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.