Purpose and Need for the Proposed Project

Introduction

Snohomish County Airport/Paine Field (PAE) is located in Snohomish County, Washington, approximately 20 miles north of Seattle. Figure A1 depicts the airport location while Figure A2 depicts the airport vicinity. The Airport is owned and operated by Snohomish County under the County Executive and the County Council with an on-site Airport Director. Two airlines have asked the Federal Aviation Administration to issue amendments to their operations specifications to allow scheduled commercial air service to the Airport. The proposed service would require an amendment to the Airport’s existing Federal Aviation Regulations (FAR) Part 139 operating certificate\(^1\). In response to this request, the County is proposing to construct a modular terminal building to accommodate the commencement of scheduled commercial air service operations and passengers. This Environmental Assessment (EA) was prepared to comply with the requirements of the National Environmental Policy Act of 1969 (NEPA) for all federal actions associated with the scheduled commercial passenger service as well as FAA Order 1050.1E, Change 1, *Environmental Impacts: Policies and Procedures*, and FAA Order 5050.4B, *National Environmental Policy Act (NEPA) Implementing Instructions for Airport Actions*.

Purpose of and Need for the Proposed Project

The purpose of the proposed action is to allow passengers to fly between Paine Field and Portland, Spokane and Las Vegas. The FAA will evaluate the requests from both Horizon Air and Allegiant Air to amend operations specifications to allow scheduled commercial air service to Snohomish County Airport/Paine Field and to approve an amendment to the FAR Part 139 operating certificate for Paine Field. The need for the proposed action is to meet demand for commercial service within the area, as identified by Horizon Air and Allegiant Air. The purpose of and need for the addition of a modular terminal building is to accommodate the proposed

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\(^1\) FAA Order 5280.5c, paragraph 209B(1)(a), Airport Certification Program Handbook. Change in AOC Class.
scheduled commercial air service at the Airport.

**Operations Specifications Amendment.** FAA’s primary mission is to ensure safety and efficiency in air commerce. Part of this mission is the issuance of operations specifications to scheduled commercial air carriers. Both Horizon Air and Allegiant Air have requested amendments of operations specifications from the FAA to operate at Paine Field (see letters in Appendix A) with specific aircraft types. Horizon Air proposes to serve the Airport with Bombardier Q400 turboprop aircraft, with Bombardier CRJ700 as its substitution aircraft. Allegiant Air proposes to serve the Airport with Boeing MD83 turbojet aircraft. 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 including, but not limited to, adequate runway and taxiway length, and adequate aircraft servicing and handling facilities. Air commerce safety is the primary consideration in determining the issuance of the specifications. As stated in 49 USC Section 44705

“The Administrator of the Federal Aviation Administration **shall** issue an air carrier operating certificate to a person desiring to operate as an air carrier when the Administrator finds, after investigation, that the person properly and adequately is equipped and able to operate safely under this part and regulations and standards prescribed under this part. An air carrier operating certificate shall (1) contain terms necessary to ensure safety in air transportation; and (2) specify the places to and from which, and the airways of the United States over which, a person may operate as an air carrier.” *(emphasis added)*

Therefore, the FAA needs to evaluate the requested change to operations specifications to determine that safety in air commerce will allow the amendment of those specifications, pursuant to 14 CFR Section 119.51 and 14 CFR Section 121, and FAA Order 9800.1, Volume 3, Chapter 18, Section 5, paragraph 3-871.

The County, as the owner and operator of the airport has limited discretion to deny an airline request to operate at Paine Field, assuming airport facilities can safely accommodate the commercial aircraft operations. The County agrees to Grant Assurances every time it accepts a grant from the FAA. There are 39 such assurances that the County has agreed to that address a variety of issues. The Assurances commit the County, as the owner of the Airport, to certain requirements. Grant Assurance 22(a) addresses Economic Nondiscrimination issues, including allowing commercial service operations to occur at the Airport. The actual text of the Grant Assurance is as follows and is a requirement found in 49 USC subtitle 47107, as amended;

22. Economic Nondiscrimination
   a. It will make the airport available as an airport for public use on reasonable terms and without unjust discrimination to all types, kinds and classes of aeronautical activities, including commercial aeronautical activities offering services to the public at the airport.
In a letter to the Airport Director dated June 4, 2008 (Appendix A), the FAA reminded the County that Grant Assurance 22(a), which the County agreed to when it accepted FAA funding, requires the County to “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.”

**Operating Certificate Amendment.** In addition to amending the operations specifications, the FAA has been asked to issue approval of an amendment to the FAR Part 139 operating certificate for Paine Field. Part 139, Section 107 states:

An applicant for an airport operating certificate is entitled to a certificate if (1) The provisions of Section 139.103 of this subpart are met; (2) the Administrator, after investigation, finds that the applicant is properly and adequately equipped and able to provide a safe airport operating environment in accordance with (i) Subpart D of this part, and (ii) any limitation which the Administrator finds necessary in the public interest; and (3) the Administrator approves the airport certification manual.

Per the FAA Airport Certification Program Handbook, a change from a Class IV operating certificate to a Class I operating certificate is required to serve scheduled commercial air service operations by large aircraft. FAA must review the change in the operating certificate to ensure that it meets all safety standards.

**Terminal Improvements.** The Airport currently has no scheduled commercial air service and its existing terminal building is not suited to serve the projected number of passengers in a safe manner consistent with local health and safety codes.

The existing terminal building cannot efficiently accommodate the projected number of passengers. Consequently, the County has engaged design consultants to determine the size of a passenger processing facility that would be necessary to accommodate the two prospective carriers. In order to efficiently and safely serve the aircraft and passengers using those aircraft, the existing passenger processing space needs to be increased. Based on FAA planning guidelines to accommodate these passengers in a safe manner, and meet security requirements, it has been determined that approximately 18,000 square feet would be needed with two aircraft “boarding gates”, and these would be sized to accommodate 225 people in the gate boarding area. According to Snohomish County Code requirements, there is sufficient existing on-airport surface parking available to accommodate the parking requirements of a building this size and thus, no additional parking is required. This terminal expansion will be a modular building placed on an existing paved apron area just west of the existing terminal building and the terminal will be sized to accommodate only the projected passengers as identified by the two airlines. There will be a covered breezeway between the existing terminal building and the new modular building. A bag make up enclosure will be attached for airline ramp personnel service. The total size of the modular terminal, bag make up enclosure and the connecting breeze-way to the existing terminal building will be...
approximately 29,350 square feet. These improvements may be constructed in phases; however, the phased construction will not exceed the footprint shown on Figure A3, **PROPOSED ACTION, TERMINAL BUILDING**. Automobile parking will be provided in existing parking areas and there is adequate ramp space to accommodate the Q400 and MD83 aircraft.

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**Federal Actions Requested**

The following is a summary of Federal Actions associated with this project for which the FAA is responsible:

- Issuance of the proposed operations specifications amendment for Horizon Air to permit scheduled commercial air service at Paine Field using the Bombardier Q400 Dash 8 as its primary aircraft and the Bombardier CRJ700 as its substitute aircraft pursuant to 14 CFR Part 119;
- Issuance of the proposed operations specifications amendment for Allegiant Air to permit scheduled commercial air service at Paine Field using the MD83 aircraft pursuant to 14 CFR 119;
- Approval of an amendment to the FAR Part 139 operating certificate for Paine Field; and,
- Approval of Airport Improvement Program (AIP) funding for the construction of modular terminal building sufficient to accommodate the proposed passenger service.

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**Action Funding and Time Frame**

It is anticipated that the cost to construct the modular terminal building will be approximately $3 million. The construction schedule and estimated first year of operations is 2013.
Figure A1  Airport Location Map

Source: Microsoft Streets & Trips.
Figure A2 Airport Vicinity

Source: Snohomish County Planning Department Mapping, Aerial Photography, and United States Geological Survey (USGS) Quadrangle Sheets.