

RECEIVED BY  
ESA  
DATE 10-2-18

October 1, 2018

Environmental Science Associates  
Paine Field Supplemental EA  
5309 Shilshole Ave. NW, Suite 200  
Seattle, Wa. 098107

To Whom It May Concern:

I live in South Snohomish County. Right now I have at least 10 commercial flights over my home in a 24 hour period. Several of us started noticing this jet noise about 6 months ago. It is deafening. The ear splitting whine of the jets or turbo props as they approach for landing reduces the quality of my life significantly. Some of the jets fly so low I can see the color of the paint on the plane. Again, the noise of the low flying jets as they come in for landing at Paine is unacceptable. I am awakened in the night by their noise. I can no longer enjoy peaceful gardening without this noise. I can no longer run my dogs at Wellington Park without at least 2 or 3 of these going overhead ruining the peace and tranquility I have enjoyed in the past on these daily walks.

The above does not take into consideration the new 24 flights per day passenger service that has all but been approved by the FAA. I want two things to happen. I want all flight patterns configured so they involve as low a density area as possible, thereby reducing the quality of life for the fewest possible people living here. I request all flights go to a higher altitude (2000 feet higher) to mitigate the noise intrusion which is already disturbing the daily life of most of us.

I am 70 years old and bought my home here when I was 26. I did not work like a field hand all my life to have my beautiful little corner of the earth blasted multiple times daily when proper planning could alleviate a significant portion of the noise. This is a health issue folks. It is well known what constant noise does to the physical and emotional well being of human beings and all other animals.

Sincerely,

*Sydney Burrus*  
Sydney Burrus

22821 57<sup>th</sup> Ave. S.E.  
Woodinville, Wa. 98072  
Phone: 425-481-5696

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## Response to Comment

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Dear Sydney Burrus:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### **General Responses**

2-4: Aircraft Currently Fly Low and Very Close to Houses

3-1: Existing Aircraft Noise Concerns

3-6: What Are the Existing and Future Noise Impacts?

3-8: What are the Health Effects of Noise?

6-1: What are the Quality of Life Impacts?

6-4: What are the Health Effects Associated with the Proposed Action?

6-11: Mitigation

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RECEIVED BY

ESA

DATE 10/8/18

To whom it may concern,

I'm writing today to express my concern regarding the operation of flights out of Paine Field. I have lived in my home for over 30 years. The last few years airplanes have been routed over my home at low altitudes at all hours of the day and night. I have reported this and requested rerouting but it still continues. The worst noise offender is the 747(Dream Lifter?). It flies low over my house in the middle of night waking me up. Even my dog wakes up barking! I am on the bluff in a populated residential area. Another few miles to the east would limit the noise over farm land. I have reported this before to no avail. I am very concerned that this will only get worse with the increase of air traffic in and out of Paine.

Regards,



Karen Einwalter

3732 91 PL SE

Everett, Wa 98208

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## Response to Comment

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Dear Karen Einwalter:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### **General Responses**

2-4: Aircraft Currently Fly Low and Very Close to Houses

3-1: Existing Aircraft Noise Concerns

3-6: What Are the Existing and Future Noise Impacts?

3-10: Boeing 747 Dreamlifter Operations

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RECEIVED BY  
ESA  
DATE - 10/10/18

October 7, 2018  
3401 Shore Avenue  
Everett, WA 98203

Environmental Science Associates  
Paine Field Supplemental EA  
5309 Shilshole Ave. NW, Suite 200  
Seattle, WA 98107

Re: Comments: Paine Field Supplemental Evaluation

The Evaluation doesn't consider the following problem areas:

1. Growth

The airline service hasn't even started. But, already the number of flights has doubled. Additional airlines will be seeking to use the new terminal also. The problems with noise pollution will become worse and worse resulting in property value decreases and create an environment where existing housing certainly will not increase in value as much as it would without airport expansion.

In addition, people's health will decrease due to the stress of noise pollution and not being able to use their property.

2. Traffic Impact

Again, before service has even started, parking facilities have been determined to be inadequate for most recent estimates of usage. Therefore, work is in progress to add new parking lots for something like 500 cars. This was not in the original plans.

Streets are already over capacity. Intentionally adding more cars to existing streets will result in more people using the side streets to try to get to the airport.

This will be an especially difficult problem during the Boeing commute daily where commuters are already using any side street they can find to try to beat traffic volumes.

It's unlikely people will use bicycles or walk to the airport. I also doubt Uber is going to solve the problem. This is an existing issue that the county and city will make worse and then blame the airport.

The Washington State Ferry is expanding its terminal. Sound Transit is expanding its parking. Add these factors to the increases in traffic generated by new airport services and the government is creating gridlock.

3. School Impact

There are many schools in the area that will have instruction disrupted by noise increases. The same is true for the Mukilteo Library and other businesses. When large jets take off and land today, it's impossible to carry on conversations while they pass. Again, government is going to make this situation worse – much worse.

4. Aircraft Used

Originally, the plan was to use small, quiet jets. Now the plan suddenly is to use large jets that produce much more noise, such as the 737, due to projected passenger estimate increases.

5. Hours of Operation

Originally, the airport was going to use limited daytime operations. Now the plan is to operate 6AM to Midnight. This will negatively impact many more households.

6. Today General Aviation uses the airport. General Aviation will be negatively impacted by all the additional traffic. Additional traffic may also impact safety.

In summary, the new Evaluation doesn't come close to evaluating future impacts. It isn't even up to date with impacts that could occur in 2019.

Assuming success, airlines will want Paine to become Seatac North. SeaTac is expensive, and the airlines know it. The airlines will attempt to move to Paine and offload expense on the cities. Government will be unable to deny an airline the opportunity to provide service. Governments will need more money for security, for safety requirements and other airport needs. This cycle will repeat over and over.

This plan is very negative for most residents. It will be positive for people who think they will just zip to the airport and fly out without driving to SeaTac. After a few traffic caused missed flights these people will be requesting new road expansion, more parking, etc.

Also, there is the matter of crime and environment surrounding airports. Airport subdivisions are not popular and the lower cost housing that will be associated over time with Paine Field will not help the existing crime and drug problem in Everett, especially the Casino Road area which is near the airport.

In my opinion what is going on here is to get the operations going by understating the number of flights, impacts on traffic, noise, and other negative impact. Once operations, then tremendous expansion is likely.

This Evaluation needs to be revised before approval to ensure accuracy. The way it is today it's a way to go forward using yesterday's environment.



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## Response to Comment

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Dear Commenter:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### **General Responses**

1-2: Scope of the Supplemental EA Analysis for Future Operations and Passengers

2-1: Why Can't the County Limit or Restrict Operations?

2-3: What are the Effects of the Proposed Project on General Aviation?

3-6: What Are the Existing and Future Noise Impacts?

3-7: Noise Impacts on Schools

3-8: What are the Health Effects of Noise?

5-1: Existing and Future Traffic

5-3: Ferry Operations

6-2: What is the Impact on Property Values?

6-3: What is the Impact of the Proposed Action On Crime?

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P4

RECEIVED BY  
ESA  
DATE  
10-11-18



A note from  
Mr. Dennis A. Brawford 9 OCT 2018

Dear FAA,

I believe Paine Field  
Commercial Air Traffic  
is essential to the  
economy of Snohomish  
county. Sincerely,

Thank you for expediting  
the approval of PAE.

Sincerely,

Dennis A. Brawford  
Darlene Brawford

[feedthechildren.org](http://feedthechildren.org)

Mr. Dennis A. Brawford  
2031 Vernon Rd  
Lake Stevens, WA 98258

SEATTLE WA 980  
09 OCT 2018 PM 7 L



Environmental Science Assoc.  
Paine Field Supplemental EA  
5309 Ahlshole Ave N.W.,  
Suite 200  
Seattle, WA 98107

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## **Response to Comment**

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Dear Dennis and Darlene Brawford:

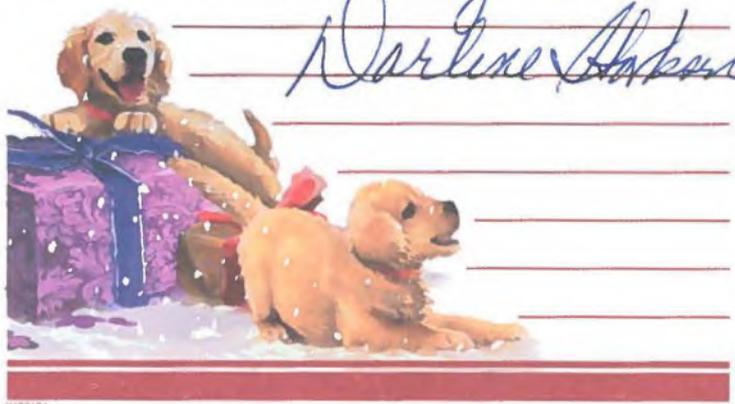
Thank you for your comments regarding the Proposed Action at Paine Field.

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RECEIVED BY  
ESA  
DATE 10-11-18  
8 Oct, 2018

Dear FAA  
Please approve  
Commercial flight  
at Paine Field  
as soon as possible.  
Thank you,  
Darlene Ashton



Y182184



Darlene Ashton  
2026 Vernon Rd  
LK. Stevens, WA 98258

Environmental Science Assoc.  
Paine Field Supplemental IZA,  
5309 Shilohide Ave N.W.  
Suite 200



98107-534450

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## **Response to Comment**

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Dear Darlene Storkson:

Thank you for your comments regarding the Proposed Action at Paine Field.

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Gary Goins  
PO Box 558  
Whidbey Island  
Langley, WA 98260

Environmental Science Associates  
Paine Field Supplemental EA  
5309 Shilshole Ave NW, Suite 200  
Seattle, WA 98107

October 14, 2018

To The Commission:

We are truly excited to have commercial flight coming to Paine Field.

Speaking as a family on Whidbey Island, the Airport's location will reduce the use of our private vehicle on airport trips 80%. We will be able to walk on the Ferry, - Clinton to Mukilteo -, and Uber/Cab to Paine Field. Environmentally speaking for us it is a win-win.

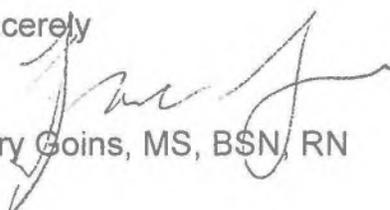
I'm just one employee however, my colleagues at Swedish Edmonds and Providence Everett hospitals represent thousands of local working families. We all take many flights yearly. *Hundreds of thousands of road miles to SeaTac saved. Millions of gallons of gasoline saved.*

A local community asset bringing enthusiasm and convenience to our area.

Paine Field commercial flight is simply a **GREAT** idea.

Thank you!

Sincerely

  
Gary Goins, MS, BSN, RN

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## **Response to Comment**

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Dear Gary Goins:

Thank you for your comments regarding the Proposed Action at Paine Field.

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**Robert A. Mayer  
5520 East Dr  
Everett, WA 98203**

**P7**

RECEIVED BY  
ESA  
DATE -10-17-18

October 16, 2018

To Whom It May Concern;

I am writing to express my support for the final FAA approval of commercial passenger service from Paine Field in Everett, WA and issuing a Finding of No Significant Impact for the 2018 Supplemental Environmental Assessment.

I am a lifelong resident of Everett and retired from a forty year career as an Electrical Engineer which involved frequent air travel through Sea-Tac airport. My air travel in retirement is exclusively for pleasure trips with my family. Due to the deteriorating experience of travelling between Everett and Sea-Tac, that part of the trip is no longer a "pleasure".

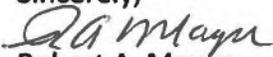
We have been looking forward to commercial passenger service at Paine Field for many years. It will finally fulfill the original purpose of the "super airport" when built in the 1930's.

Based on the September 2018 Draft Supplemental Environmental Assessment Table 3-5, over 650,000 commercial passengers will depart from PAE annually with approximately the same number arriving. That's over 1.3 million passengers relieved of the stress of driving through Seattle to and from Sea-Tac every year. Taking these passengers off of I-5 is a huge positive result of the proposed action that assessment shows has a finding of no significant impact.

Last summer we attended a music concert in Marysville. The famous performer came on stage looking a bit tired and unkempt. She apologized and explained that she had flown from Alabama to Seattle with a connection in Atlanta. She landed at Sea-Tac at 4:00 pm thinking there was plenty of time but then she encountered Thursday evening I-5 traffic. She arrived at the venue with barely enough time to put on lipstick before the start of the 8:00 pm show. Driving to Sea-Tac to catch a flight is a totally unpredictable experience that has probably discouraged profitable job-producing businesses from locating here too.

We live about three miles from the north end of the runway and flights frequently pass over our home. It is great to know that soon some of those flights will be carrying commercial passengers. We are looking forward to joining them.

Sincerely,

  
Robert A. Mayer

redchev1@comcast.net

(425) 353-0698

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## **Response to Comment**

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Dear Robert Mayer:

Thank you for your comments regarding the Proposed Action at Paine Field.

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RECEIVED BY  
ESA  
DATE 10-19-18

**Mail to:**

Environmental Science Associates, Paine Field Supplemental EA  
5309 Shilshole Ave NW, Suite 200  
Seattle, WA 98107

**Re: Support for Commercial Air Service at Paine Field**

My name is Jac-e Albertsen, a residential loan officer. [include a paragraph describing yourself and your thoughts about this issue]. ~~#~~ A frequent traveler, this will save our family

time to drive a region airport so close to home. I am writing to offer my strong support for commercial air service at Paine Field.

With Sea-Tac airport nearing capacity and our region's continued growth, we need to expand and enhance our transportation infrastructure by maximizing the use of all our options and assets – as fits a growing, thriving, competitive region.

For residents of Snohomish and north King County, catching a flight out of Sea-Tac can be a challenge given traffic congestion and an airport often at capacity. Commercial service at Paine Field will improve the travel experience for residents and businesses while also boosting our local economy.

When Paine Field is open, the new airport will provide travelers to/from our region with choice in how they fly commercially and will open eight West Coast destinations to new direct service. Each month, more than 200 Boeing airplanes take off from Paine Field. With this existing infrastructure and new private investment, our community will be able to enjoy expanded travel options – this is a true win-win.

Additionally, fewer cars traveling south through traffic is good for the region. We need to reduce our time in traffic and Paine Field will be a much-needed step forward in providing residents with better and more efficient solutions travel solutions.

New air service from Paine Field will provide our community with high quality, family-wage jobs and it will boost tourism and business travel to the region. Though our region has enjoyed a long period of prosperity and growth, there are indicators of change on the horizon: international trade disputes, tariffs, and fewer international visitors nationwide. Now is the time to bolster Washington state's trade-dependent economy.

Thank you for your commitment to a thorough and public process around this issue. We ready to take flight with service at Paine Field.

Sincerely,

NAME

Jac-e Albertsen

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## Response to Comment

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Dear Jace Albertsen:

Thank you for your comments regarding the Proposed Action at Paine Field.

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P9

I AM LOOKING FORWARD TO  
THE NEW AIRPORT AT PAINE FIELD.  
IT WILL BE VERY BENEFICIAL  
TO THIS REGION

*David Pearson*

RECEIVED BY

ESA

DATE - 10/22/18

Mr. David Pearson  
8914A 1st St NE  
Lake Stevens, WA 98258

SEATTLE WA 980

18 OCT 2018 PM 7 L



FAA:  
Environmental Science Assoc.  
Paine Field Supplemental EA  
5309 Shilshole Ave. N.W.  
Suite 200  
Seattle, WA 98107

98107-534450

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## Response to Comment

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Dear David Pearson:

Thank you for your comments regarding the Proposed Action at Paine Field.

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**Esterline Control &  
Communication Systems**  
11910 Beverly Park Rd  
Everett, WA 98204

Tel: (425) 297-9700  
Fax: (425) 297-9876  
www.esterline.com  
NYSE Symbol: ESL

RECEIVED BY

ESA

DATE - 10/22/18

October 11, 2018

Environmental Science Associates, Paine Field Supplemental EA  
5309 Shilshole Ave NW, Suite 200  
Seattle, WA 98107

Re: Support for Commercial Air Service at Paine Field

My name is Jason Childs and on behalf of Esterline's Washington state business operations, I am writing to offer my strong support for commercial air service at Paine Field. Esterline is a large aerospace and defense company headquartered in Bellevue and employs over 1000 people in Washington, including over 700 at our facility on the edge of Paine field in Everett.

Adding commercial air service at Paine Field will be highly beneficial to the region and to Esterline and our industry partners based locally. Quicker and easier access to air travel will allow better access to our customer base and provide our customer's more efficient and direct access to our facilities. This in turn will undoubtedly lead to our ability to better service our Customers needs and win new business which ultimately drives economic impact and growth for the region.

With Sea-Tac airport nearing capacity and our region's continued growth, we must expand and enhance our transportation infrastructure by maximizing the use of all our options and assets – as fits a growing, thriving, competitive region. For residents of Snohomish and north King County, travel to SEATAC can be a challenging with today's traffic congestion. Commercial service at Paine Field will improve the travel experience for residents and businesses while also boosting our local economy.

New air service from Paine Field will also provide our community with high quality, family-wage jobs and boost tourism and business travel to the region. Though our region has enjoyed a long period of prosperity and growth, there are indicators of change on the horizon: international trade disputes, tariffs, and fewer international visitors nationwide. Now is the time to bolster Washington State's trade-dependent economy.

Thank you for your commitment to a thorough and public process around this issue. We eagerly anticipate air service at Paine Field in the very near future.

Sincerely,

A handwritten signature in blue ink, appearing to read "J Childs", written over a horizontal line.

Jason Childs,  
President – Esterline Control & Communication Systems

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## **Response to Comment**

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Dear Jason Childs:

Thank you for your comments regarding the Proposed Action at Paine Field.

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P11  
RECEIVED BY  
ESA  
DATE-10/22/18

## **Response to 2018 Draft Supplemental Environmental Assessment for Proposed Commercial Air Service at Paine Field**

After thoroughly studying the Draft Environmental Assessment and its appendices, my conclusion is that the Assessment is deficient in so many respects it would take a document of equal length to enumerate all its failures. To assert, as the Assessment does, that a 415 percent increase in passenger carrier aircraft operations (Assessment Table 3.4) will have *no* environmental impact is patently absurd. Similarly, to assert that bringing 1,312,000 passengers to Paine Field in 2019 (Table 3.5), with more to come in the future, will have no environmental impact on traffic or the surrounding communities is equally absurd. However, my primary concern is with the noise impacts of the proposed action, so I will confine my comments to that issue. Specifically:

The Assessment treats Paine Field as if it were a separate entity, isolated from surrounding communities, and says that disturbing levels of noise from flight operations is miraculously somehow confined within the limits of the airport boundaries. Nothing could be further from the truth. The fact is that noise from increased flight operations at Paine Field will inescapably have enormous impact on surrounding communities—Mukilteo, Edmonds, Lynnwood and Everett on the mainland, and Clinton, Langley and populated rural areas on South Whidbey Island. Paragraph 6.11.2 shows clearly that the Assessment gives no consideration to existing severe noise impacts on South Whidbey, let alone how much those impacts would increase with 8,760 additional flights per year.

The main problem concerning South Whidbey Island is that aircraft taking off in a northward direction from Paine Field are often directed to make a 90-degree turn to the west, which takes them directly over the island, usually between Clinton and Langley. Since these aircraft have just taken off, they are still at very low altitude and carrying a full fuel load when they approach the island so their engines are at full throttle as they try to gain altitude. Radar images obtained from Paine Field show dozens of flights passing directly over my home on South Whidbey at altitudes between 600 and 2,000 feet, with hundreds more flights passing almost directly overhead. Since my home is at an elevation of 175 feet, some of these flights are only 425 feet overhead. There are many other homes on a ridge about 200 feet higher just west of my residence, and their unfortunate occupants must experience even greater and noisier roof dustings from these departing flights. While incoming flights are not as often routed on the opposite heading, radar images show many aircraft descending over these populated areas at similarly low altitudes.

As a former Navy officer who spent two years living directly under the flight deck of an attack aircraft carrier, I am extremely familiar with jet noise. When I built my retirement home on South Whidbey, the location was chosen in part because it was then very quiet. I never dreamed that in my senior years I would again be exposed to the fierce noise of multi-engine jets screaming over my home at low altitudes and all hours of the day and night. The noise is often so loud it causes the walls of my home to vibrate, drowns out conversation, interrupts and destroys sleep, and generally degrades our quality of life. While jets are the primary source of this ungodly racket, the number of private aircraft flights over this area also

has increased exponentially, and it is not unusual to be disturbed by several low-flying noisy propeller-driven aircraft at the same time.

Many of my neighbors also have complained of the noise which is already a very serious problem, one that will only increase if the proposed action is taken. The Assessment also is notably silent on the question of what happens after 2024. Suppose the airlines decide to double the number of flights from 24 to 48? Or more? The proposed action appears to open the door to unlimited expansion in the number of flights. Who will then compensate South Whidbey homeowners for the inescapable decline of their property value? Who will compensate them for loss of sleep and destruction of their quality of life?

It is clear that if this proposal goes forward it will be for the profit and convenience of very few at the expense and loss of many. On that basis alone, not to mention the overwhelming opposition of communities near the airport, the No Action alternative is the obvious choice. However, since it appears this Assessment was prepared expressly for the purpose of assuring approval of the proposed action, it seems very likely to be railroaded through. If that proves to be the case, there is one form of mitigation that would greatly reduce aircraft noise impacts on South Whidbey and avoid the costs and misery additional flights will surely cause, and that is to change the routing of aircraft departing from or arriving at Paine Field so they do not pass directly over populated areas of the island. It would seem to make a great deal more sense to vector these flights over water, i.e. Saratoga Passage, where noise impacts on populated areas would be minimized until departing aircraft can reach altitudes where their noise is no longer such a disturbing or distressing factor. I strongly urge that this be done if a decision is made to approve the proposed action.

I also request that these comments be made part of the hearing record.

**Steve Raymond**  
**P.O. Box 673,**  
**Clinton WA 98236**

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## Response to Comment

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Dear Steve Raymond:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### **General Responses**

- 1-3: Flawed/Inadequate Supplemental EA
  - 1-7: Study Areas
  - 1-8: Significance of Project Impacts
  - 1-9: How is Significance Defined?
  - 2-4: Aircraft Currently Fly Low and Very Close to Houses
  - 3-1: Existing Aircraft Noise Concerns
  - 3-6: What Are the Existing and Future Noise Impacts?
  - 6-11: Mitigation
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Ms Margaret H Patrick  
11614 10th Ave W  
Everett, WA 98204

20 OCT 2018 PM 3 L

SEATTLE WA 980



USA FIRST CLASS PERMIT

Environmental Science Associates

Paine Field Supplement EA; 5309

Shilshole Ave NW, Suite 200

Seattle, WA. 98107



To: Environmental Science Associates  
From: MARGARET H Patrick - zip code 98204  
Re: Possible Commercial Flights

I am happy to say I can't wait!  
However - when we first learned  
about the proposal, only 12 flights per  
day were asked for, now, it 24, why  
not wait to see if Ever thing is going  
to work before pushing for twice the  
flights - Seems a bit greedy -

Thank You  
Margaret

RECEIVED BY

ESA

DATE - 10/23/18

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## Response to Comment

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Dear Margaret Patrick:

Thank you for your comment regarding the Proposed Action at Paine Field. Please see the following general response that applies to your comment.

### **General Response**

1-2: Scope of the Supplemental EA Analysis for Future Operations and Passengers

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October 20, 2018

Environmental Science Associates  
Paine Field Supplemental EA  
5309 Shilshole Ave NW, Suite 200  
Seattle, WA 98107

RECEIVED BY  
ESA  
DATE- 10/24/18

Subject: Public Comment on the Draft Supplemental EA—Paine Field Commercial Flights

As a current resident of Whidbey Island, please consider my input as a stakeholder in the quality of life on our beautiful rural island and your decision's impacts upon those of us who call this area home. My concerns address the wide swath of communities, waterways, farmlands and forests where we live and conduct our lives in the flight patterns of prospective commercial planes from Paine Field. After growing up and attending school in the SeaTac area, I am well acquainted with the trade-offs of living near an airport and its daily impact on quality of life. The proposal to begin commercial airplane flights would bring permanent, disruptive change for our communities and we have strong concerns about the implications to this part of our state that would exist forever after.

An update of the FAA review was recently published in *The Seattle Times* and, as a current resident of Whidbey Island and a former resident of SeaTac and based upon my personal experience and research, following are my areas of concern:

### Traffic

Per The Seattle Times article, the FAA report projects enplanements at about 656,000 passengers in 2019 and 736,000 in 2024, yet they indicated the highways are already clogged and would remain so regardless. Quoting the article: "Commercial flights would mean more traffic on adjacent roads and highways, the FAA said, but not enough to cause significant slowdowns. Areas that are already congested, including portions of Interstate 5 and Highways 99, 525, and 526, would remain clogged regardless of the addition of drivers making their way to the airport, the FAA said."

If we estimate two passengers per car, that puts 328,000 additional cars on the roads to Everett's Paine Field next year. For those of us who commute daily on these already snarled roads, this number of additional cars will mean more gridlock and delays, and the FAA comment seems unconcerned. Add to that the additional traffic that surrounds any airport: cabs, hotel/parking shuttles, busses, catering delivery trucks, and more. While the FAA has their own agenda and is not tasked with traffic on our roadways, I am concerned if this kind of impact on traffic congestion is okay with the State of Washington, and the leaders and citizens of the affected counties and communities. As a resident I can tell you, it is not okay with me.

### Noise

Whidbey Island is already exposed to jet engine noise from Bellingham commercial flights, Boeing test flights and airplane deliveries, and the fighter jet noise from Growler training flights at the Naval Air Station (NAS) at Oak Harbor. On June 26 of this year KOMO News (Michelle Esteban) reported that NAS Whidbey is planning "a dramatic increase of fighter jet traffic" with 36 more Growlers totaling 118 fighter jets and additional operations including take-offs and landings in Oak Harbor (13,000 additional operations) and Coupeville (increasing four-fold to 23,700 operations), raising already considerable noise levels for the community. NAS Whidbey works closely with the community, releasing flight schedules and limiting weekend flights, but did the FAA take NAS Whidbey noise into consideration when they decided to add commercial flights from Paine Field and add further jet engine noise to the mix? It doesn't need to be deafening decibels to be disruptive. Airplane noise has a severe effect on classroom learning and has a negative effect on property values and quality of life. If our pristine islands and recreational areas become inundated with noise, then where can people go to relax and enjoy silence and the sounds and joys of nature? Is there oversight by our counties and state concerning over-all impact of noise to our communities and preserving serenity for the state's pristine areas? If not, why not? Once the silence is gone, we cannot get it back. Again, as a resident this is not okay.

### Pollution/Health

Jet fuel contains a known carcinogen (benzene) and a variety of air pollutants, including sulfur dioxide and nitrogen oxides. Numerous studies have found links to increased rates of psychological impairment, degenerative illnesses and early mortality for those living within a 20 mile radius of an airport (source: Regional Commission on Airport Affairs, "Truth in Aviation" September 13, 2004 (Vol. 12 #2)). As the crow flies, the distance from Paine Field to our Greenbank

home is 19 miles. The radius would be far-reaching, encompassing numerous communities and waterways—from Silvana to Seattle/Bellevue, Mercer Island and from Port Ludlow nearly to Sultan and the many communities in between.

Wells and water supplies are also threatened for those near the airport by materials used on the field, or any emergency fuel dumping that might occur. NAS Whidbey has been working since 2016 to protect Whidbey Island's water supply after chemicals called PFASs (from foam fire suppressant) were found in some Whidbey Island wells. It is unseemly to expose our community to further air and water pollution with commercial flights.

Harm from air, water and noise pollution to our natural resources, orca pods, herons and eagles around Whidbey and Camano Island are a concern too. Once again, as a resident, this is not okay.

### **Community**

Whidbey Island and many surrounding communities have a focus on retaining their small town identities and close knit rural uniqueness. "Box" stores are eschewed and locals and tourists alike value the Pacific Northwest lifestyle that embraces community, locally grown/raised food, locally owned businesses, and a healthy, caring lifestyle. The businesses that surround an airport support a transient group with no investment in the health of our communities. Chain hotel/motels, fast food restaurants, parking lots, gas stations, and mini-marts extend for miles near every airport. Why would our county and state leaders not try to protect the environment and culture of this unique area, a "jewel" in our state, already challenged with the issues described above? Even non-residents love to visit our islands and destinations to enjoy the silence, the beauty, the wildlife, the seashore. Changing our community would affect more than its residents, it would foul the nest of some of the state's favorite destinations.

### **Conclusion**

I appreciate the opportunity to comment on the proposed airport pursuant to a final decision. Whidbey Island has been part of our lives for many years, first as day trip and weekend getaway destination when we were raising our family in Bellevue, later when we purchased a vacation home, and finally when we retired here fourteen years ago. While at first glance, some of us saw the convenience in having an airport closer than SeaTac, we soon realized that for the one or two times each year we might fly, the negatives outweighed the positives with permanent harm to our environment, home values, farmland, communities, wildlife, health and quality of life. Over time our communities would be consumed by providing an alternate airport for travelers from all over the state, and the pristine beauty of our area would soon disappear. We appeal to Governor Inslee, Congressman Larsen, Congresswoman Cantwell, Congresswoman Murray, and those protecting the values and resources in our state to hear and understand our concerns and take steps to stop commercial flights from Everett's Paine Field to preserve our beautiful and beloved part of the country.

Respectfully submitted,



Diana and Gary Carew  
1281 Via Toscana Lane  
P.O. Box 267  
Greenbank, WA 98253  
dianacarew2010@comcast.net

Cc:

Representative Barbara Bailey  
Representative Dave Hayes  
Representative Norma Smith  
Governor Jay Inslee  
Congressman Rick Larsen  
Senator Maria Cantwell  
Senator Patty Murray

---

## Response to Comment

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Dear Diana and Gary Carew:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### **General Responses**

1-7: Study Areas

2-1: Why Can't the County Limit or Restrict Operations?

2-5: Would there be an Increase in Fuel Dump/Fuel Smell/Residue?

3-1: Existing Aircraft Noise Concerns

3-6: What Are the Existing and Future Noise Impacts?

3-7: Noise Impacts on Schools

4-1: Sources of Existing Air Pollution

4-2: Air Quality

5-1: Existing and Future Traffic

6-1: What are the Quality of Life Impacts?

6-2: What is the Impact on Property Values?

6-4: What are the Health Effects Associated with the Proposed Action?

6-5: What is the Impact on Wildlife?

6-8: Cumulative Impacts

6-9: Water Quality Impacts

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P14

RECEIVED BY  
ESA  
DATE-10/24/18

October 19, 2018

The purpose of this note is to support the ongoing efforts to develop commercial flights from Paine Field.

Roy and Barbara Yates  
811 Rucker Ave  
Everett, WA 98201

*Roy Yates*  
*Barbara Yates*

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## **Response to Comment**

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Dear Roy and Barbara Yates:

Thank you for your comments regarding the Proposed Action at Paine Field.

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P15

## *Iova Insurance Agency*

WA License Number 709562

12106 20<sup>th</sup> Street NE, Lake Stevens, WA 98258  
Bus: 866-244-4682 Fax: 877-202-4964 Cell: 206-619-8246

[iovac@iovainurance.com](mailto:iovac@iovainurance.com)  
[www.iovainurance.com](http://www.iovainurance.com)

RECEIVED BY

ESA

DATE - 10/24/18

October 17, 2018

ENVIRONMENTAL SCIENCE ASSOCIATES,  
PAINE FIELD SUPPLEMENTAL EA  
5309 SHILSHOLE AVE NW, SUITE 200  
SEATTLE, WA 98107

RE: SUPPORT FOR COMMERCIAL AIR SERVICE AT PAINE FIELD

My name is Iova Corcovelos & I own and insurance brokerage in Lake Stevens, WA and also have an office in Lake Arrowhead, CA.

I fly Alaska Airlines back & forth for business & it would take a huge burden off of my travels if we had a Snohomish County Airport, instead of having to fight our way through SeaTac.

My husband & I used to own our own airplane & had a hanger at Boeing but moved it to Paine Field as it wasn't as busy & crowded and was so much closer to where we lived.

I strongly support a Commercial Air Service at Paine Field due to SeaTac being so overcrowded, time consuming & exhausting!

Snohomish County is growing so fast and needs traffic relief from the freeways as well as the airport!

Paine Field will also encourage continued growth for our county as well additional jobs & tourism.

We appreciate your commitment to seeing this through so that our county can continue to grow & prosper.

We are ready to take flight with a Paine Field Airport...bringing customers in as well as being able to get out comfortably.

Most Sincerely,

*Iova Corcovelos*

*Elite*  
Commercial Agent

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## **Response to Comment**

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Dear Iova Corcovelos:

Thank you for your comments regarding the Proposed Action at Paine Field.

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## Board of Trustees

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<b>Dr. Marci Larson</b> Mukilteo School District	<b>Allison Warren-Barbour</b> United Way of Snohomish County
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<b>Chris Lyons</b> Frontier Communications	<b>Kim Williams</b> Providence Regional Medical Center Everett
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<b>Dr. Kristine McDuffy</b> Edmonds School District	<b>Jonahlyn Woolf-Ivory</b> Sno-Isle Libraries
<b>Bill McSherry</b> The Boeing Company	
<b>Erin Monroe</b> Workforce Snohomish	

Environmental Science Associates  
Paine Field Supplemental EA  
5309 Shilshole Ave NW, Suite 200  
Seattle, WA 98107

October 18, 2018

### Re: Support for Commercial Air Service at Paine Field

Economic Alliance Snohomish County (EASC) is writing to offer our strong support for commercial air service at Paine Field. With Sea-Tac airport nearing capacity and our region's continued growth, we need to expand and enhance our transportation infrastructure by maximizing the use of all our options and assets – as fits a growing, thriving, competitive region.

EASC is the combined economic development organization and countywide chamber of commerce for Snohomish County. We bring together private and public partners to create a unified voice for Snohomish County. We are committed to growing and nurturing a vital regional economy that is globally competitive. We achieve this by expanding partnerships, developing key resources and building the infrastructure systems creating local and regional employment centers.

For residents of Snohomish and north King County, catching a flight out of Sea-Tac can be a challenge given traffic congestion and an airport often at capacity. Commercial service at Paine Field will improve the travel experience for residents and businesses while also boosting our local economy.

Airport proximity (typically 60 minutes) is a condition for many companies considering locations for an expansion project. Growth in the area and the associated traffic congestion to SeaTac, in most cases, removes Snohomish County from consideration. The new airport should make the area more attractive to businesses. Commercial service at Paine Field will also be an asset for many of our existing businesses, especially in aerospace and life science, where one-day trips to the Bay Area and Los Angeles are common. Paine Field offering commercial flights will bring greater economic development opportunities to our region and make travel a little more pleasing for residents in north of King County.

When Paine Field is open, the new airport will provide travelers to and from our region with a choice in how they fly commercially and will open eight West Coast destinations to new direct service.

There are currently 300 flight operations daily at Paine Field. With this existing infrastructure and new private investment, our community will be able to enjoy expanded travel options – this is a true win-win.

Additionally, fewer cars traveling south through traffic is good for the region. We need to reduce our time in traffic and Paine Field will be a much-needed step forward in providing residents with better and more efficient solutions travel solutions.

New air service from Paine Field will provide our community with high quality, family-wage jobs and it will boost tourism and business travel to the region. Though our region has enjoyed a long period of prosperity and growth, there are indicators of change on the horizon: international trade disputes, tariffs, and fewer international visitors nationwide. Now is the time to bolster Washington State's trade-dependent economy.

Thank you for your commitment to a thorough and public process around this issue. We are ready to take flight with service at Paine Field.

Sincerely,



**Patrick Pierce**  
President & CEO, EASC



As a regional leader, **Economic Alliance Snohomish County** exists to be a catalyst for economic vitality resulting in stronger communities, increased job creation, expanded educational opportunities, and improved infrastructure.

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## **Response to Comment**

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Dear Patrick Pierce:

Thank you for your comments regarding the Proposed Action at Paine Field.

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**From:** [John Newhoff](#)  
**To:** [Paine Field](#)  
**Subject:** Environmental Assessment for commercial air service  
**Date:** Monday, October 22, 2018 10:09:46 AM

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Hello,

Regarding the proposed commercial air service at Paine, i learned recently the a fairly large amount of space near the old Jet Deck restaurant building will be converted for the long term to a large parking area for cars, presumably for commercial air service customers.

While I understand the need for something like this, I find it concerning that this is largely coming from general aviation aircraft parking.

My flying club is on a longggg waiting list for hanger space and the prospects of losing parking for general aviation planes with no plans for improving the GA hanger availability seems to be ignoring an already existing problem.

I really hope the airport's long term management plans take this into account and work towards more GA hanger space and/or improving the utility of existing hanger space where car access, bathrooms, or flight planning space doesn't exist.

Thanks,  
John Newhoff  
Board Member, Cascade Flyers  
206-229-4655

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Member of the Board, [Washington's National Park Fund](#)

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## Response to Comment

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Dear John Newhoff:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general response that applies to your comments.

### **General Response**

2-3: What are the Effects of the Proposed Project on General Aviation?

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**From:** [Barbara Grimes](#)  
**To:** [Paine Field](#)  
**Subject:** Public comment  
**Date:** Monday, October 22, 2018 10:00:59 PM

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Please note my two comments below.

1) There is no reason to allow night time flights. Takeoffs should be limited to day time hours of 7am to 10 pm.

2) Traffic mitigation on Mukilteo Speedway (525) should be taken. There will be overflow traffic on 525. An HOV lane in both directions should be added.

Thank you for providing opportunity to comment.

Barbara Grimes

12807 57th Pl W Mukilteo WA 98275

425-218-6668

[Blf.grimes@gmail.com](mailto:Blf.grimes@gmail.com)

--

Barbara Grimes 425-218-6668 [Blf.grimes@gmail.com](mailto:Blf.grimes@gmail.com)

---

## Response to Comment

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Dear Barbara Grimes:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### **General Responses**

3-9: Request for Noise Curfew/Activity Restrictions  
5-1: Existing and Future Traffic  
5-2: Traffic Analysis  
6-11: Mitigation

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**From:** Russell Popp <[raftnuts@comcast.net](mailto:raftnuts@comcast.net)>

**Sent:** Sunday, October 28, 2018 11:51 AM

**To:** Paine Field <[painefield@esassoc.com](mailto:painefield@esassoc.com)>

**Subject:** Fwd: Reminder: please consider writing a response for the public comment period

Dear Paine Field / FAA:

I was surprised to see that our neighborhood was completely left out of the Generalized Study Area (see below photo and attached description of the area). The study really should have included us since we're obviously just north of the main runway and the jets fly pretty low over us. We measured the noise from a typical one at 85 decibels. I think we for the impact on all homes north of the runway to be studied.

Also on the attached you can see how the New Activity (Proposed Action) column might not look like a large increase compared to the grand total annual flights that includes General Aviation (propeller) flights. But assuming that "Air Carrier" indicates passenger jet flights, the daily average of 12.57 jet flights will go up to 35 daily flights. I'm not sure how that can be thought of as "insignificant".

The study concludes that that no single-family residences are impacted, and no mitigation is needed for them. I can't believe how that could be possible. It is a safety issue with increased noise, pollution, and the increase in traffic in the general area. When planes fly over now, it is very difficult to talk let alone sleep.

We recognize that this brings "good" to the area at large. In the spirit of that we would request that Airlines and Propeller to abide by some restrictions:

- Increase the noise restriction levels for the commercial flights. Currently Paine Field only requires "Stage 2" noise levels, but I've heard from a Boeing friend that we should ask for Stage 4 or higher.
- The size of the commercial jets should be limited as much as possible, preferably to the 737 Max and the A320Neo since they are the quietest airplanes currently available.
- Limit hours to 7am to 10 pm. Other community airports have restricted hours. John Wayne in Santa Ana, the Long Beach airport with it's required steep ascents, etc.
- Enforce the Stage 2 noise levels for propeller planes

Thank you,

Russell and Terri Popp

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## Response to Comment

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Dear Russell and Terri Popp:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### General Responses

- 1-7: Study Areas
- 1-8: Significance of Project Impacts
- 1-9: How Is Significance Defined?
- 2-4: Aircraft Currently Fly Low and Very Close to Houses
- 3-1: Existing Aircraft Noise Concerns
- 3-6: What Are the Existing and Future Noise Impacts?
- 3-9: Request for Noise Curfew/Activity Restrictions
- 6-11: Mitigation

Please also see the following individual response.

### Stage 2 Aircraft

Passage of the Airport Noise and Capacity Act of 1990 (ANCA) prohibited operation of Stage 1 and Stage 2 jet aircraft with a maximum weight above 75,000 pounds within the United States after December 31, 1999. In addition, the FAA Modernization and Reform Act of 2012 (FMRA) prohibits operation of Stage 1 and Stage 2 jet aircraft with a maximum weight of 75,000 pounds or lower within the 48 contiguous United States after December 31, 2015.

As a result of ANCA, no new noise and/or access restrictions at airports can be implemented without a thorough demonstration of the need for the restriction, a detailed analysis of the restriction and its consequences, a demonstration that the benefits of the restriction outweigh its costs, evidence that all other nonrestrictive measures have been exhausted, input from the affected aircraft operators regarding the restriction, and approval of the restriction by the FAA. Given that all of the DNL 65 contours for Paine Field's existing and future aircraft operations with and without the Proposed Project contain no non-compatible land uses, there is no basis to restrict aircraft from operating at PAE.

There are very few Stage 2 propeller aircraft that operate at Paine Field; approximately five round-trip flights a day are by Stage 2 propeller aircraft such as the Cessna 182. Operation of these aircraft is consistent with all applicable federal laws. Therefore, there is no legal method of restricting these operations as there would be no way to demonstrate a need consistent with ANCA when there are no noncompatible land uses within the DNL 65 dB contour to mitigate.

Additionally, the Airport has voluntary Noise Abatement Procedures for both small and large propeller aircraft, which are described in detail on Paine Field's website (<https://www.paineairport.com/159/Noise-Abatement-Procedures>).

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Environmental Science Associates, Paine Field Supplemental EA  
5309 Shilshole Ave NW, Suite 200  
Seattle, WA 98107

RECEIVED BY

ESA

DATE: 10-26-15

### I Support Commercial Air Service at Paine Field

I am Tim Raetzloff. I support commercial air service at Paine Field. I live in north Edmonds so I am aware of air traffic as it now exists, and I don't think that 30, or so, additional flights a day will impact the area in any way. The noisiest planes now are the Dreamlifters of the Boeing company, and the vintage aircraft from the museums.

I hate driving to Sea-Tac to take a flight or pick up someone from a flight.. I pay extra to use Shuttle Express to avoid the Seattle traffic situation. The problem with that solution is that it costs more and takes additional time. i am looking forward to being able to take a plane from Paine instead.

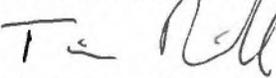
I know that some people in Mukilteo are complaining that commercial flights will make their homes unlivable. I don't see how that is possible. The noise of air traffic is already there, and the planes I mentioned earlier are noisier than anything that is likely to be added.

I have a very good friend who lives in a condominium not far from the south runway of Paine Field. When I am at her home with the deck door open I rarely notice aircraft noise, and when I do notice it it is the noisier planes I have already mentioned.

Commercial planes are getting quieter all the time. Not many years ago I was by the runway when the 777 prototype took off. It was followed by an older model 727. The noise difference was tremendous, and it was the older, smaller plane that made far and away the most noise.

I am looking forward to taking a flight from Paine Field. It almost doesn't matter where the destination. The joy of flying without doing the Sea-Tac mess will be the pleasure itself. i enjoy flying. I just don't enjoy flying from Seat-Tac.

Give us a break. Give us a local commercial airport.



Tim Raetzloff  
1428 9th Avenue N  
Edmonds, WA 98020-2626  
425-772-3279

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## **Response to Comment**

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Dear Tim Raetzloff:

Thank you for your comments regarding the Proposed Action at Paine Field.

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From: Comcast <[cougar1987@comcast.net](mailto:cougar1987@comcast.net)>

Sent: Sunday, October 28, 2018 4:04 PM

To: Paine Field <[painefield@esassoc.com](mailto:painefield@esassoc.com)>

Cc: Bob Tucker <[cougar1987@comcast.net](mailto:cougar1987@comcast.net)>

Subject: Comments To The Supplemental Environmental Assessment For Commercial Flights From Paine Field

We believe that the subject environmental assessment is flawed and incomplete and should be set aside and redone. Commercial flights from Paine Field should be delayed until this assessment is corrected.

The following are the reasons supporting our position:

1. We disagree with the assessment's findings that there will be no significant impacts to the following aspects of living near Paine Filed as commercial service starts and continues to grow:

\*Traffic - increased in an area that already has high traffic volumes.

\*Schools - noise increases and mitigation costs will be significant

\*Noise - increased for everyone and significantly so for some.

\*Home value reduction leading to increased tax rates to cover less tax revenue

\*Loss of home equity

\*Conversion of home ownership to rentals

\*The appearance of undesirable businesses generating unwanted activities that are typically criminal in nature, or nearly so, and that are typical for a close proximity to an airport. Examples include rundown motels, strip clubs, rundown bars where the increased tax burden for increased law enforcement will then fall on surrounding cities and citizens. Crime will undoubtedly increase. Who will be responsible for addressing this increase?

2. Why wasn't a more comprehensive EIS conducted, instead of the streamlined Environmental Assessment, given the magnitude of this change?

3. Why weren't more public hearings than one held?

4. The study's definition of a significant impact must be incorrect to have ignored all of the issues brought out above in Point #1. What criteria defines what a significant impact is? This definition and criteria needs to be revised and the study redone.

5. What assurances are there that the cumulative impacts of all scheduled service will be assessed with any increase in operations? The FAA and Snohomish County are trying to established a precedent which will allow incremental growth over time without any assessment of the impacts to the surrounding area. This is wrong and bordering on criminal. The FAA and Snohomish County need to comply fully with the letter and spirit of the law requiring a comprehensive and objective assessment of all impacts with business interests set aside.

6. What assurances are there that mitigation of impacts will be paid for solely by Propellor Aviation and the operating airlines and not the taxpayer?

7. In light of the abject failure of “after the fact” initiatives like SeaTac Airport’s Greener Skies Over Seattle, the Paine Field supplemental assessment must be set aside, redone correctly, and acted upon in an intelligent manner with the best interests of the public in mind.

8. We believe that Snohomish County and Propellor Aviation should lead an effort to make Paine Field an example of a good neighbor to the surrounding communities by addressing the above concerns and working to implement a voluntary night time curfew for commercial flights.

Robert and Kittie Tucker  
9550 57th Avenue West  
Mukilteo, WA 98275  
425-348-5475  
[cougar1987@comcast.net](mailto:cougar1987@comcast.net)

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## Response to Comment

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Dear Robert and Kittie Tucker:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### **General Responses**

- 1-2: Scope of the Supplemental EA Analysis for Future Operations and Passengers
  - 1-3: Flawed/Inadequate Supplemental EA
  - 1-4: Adequacy of Public Involvement and Public Hearing
  - 1-5: Additional Study Should Be Conducted
  - 1-8: Significance of Project Impacts
  - 1-9: How Is Significance Defined?
  - 3-1: Existing Aircraft Noise Concerns
  - 5-1: Existing and Future Traffic
  - 6-2: What is the Impact on Property Values?
  - 6-3: What is the Impact of the Proposed Action On Crime?
  - 6-8: Cumulative Impacts
  - 6-11: Mitigation
- 
-

**From:** Cioffoletti (US), Martin S <[martin.s.cioffoletti@boeing.com](mailto:martin.s.cioffoletti@boeing.com)>

**Sent:** Tuesday, October 30, 2018 5:42 PM

**To:** Paine Field <[painefield@esassoc.com](mailto:painefield@esassoc.com)>

**Subject:** Comment on 2018 Draft Supplemental Environmental Assessment for Proposed Commercial Air Service at Paine Field - Jet Engine Particulate concern

Flights into and out of Paine field fly down Edgewater Creek as the flight corridor. I live on Edgewater creek and often wonder about "Fine Particle Contamination" raining down on my property and those around me. I would like to see an evaluation of the particulate exhaust emitted by commercial airplanes and the literal "fallout" of that exhaust onto homes and property. I have not seen a report relating the physical by-products of engine exhaust and the impact those by-products have to those living under them.

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## Response to Comment

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Dear Martin Cioffoletti:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general response that applies to your comments.

### **General Response**

2-5: Would there be an Increase in Fuel Dump/Fuel Smell/Residue?

Please also see the following individual response.

### **Fine Particle Contamination**

The USEPA does not currently have standards related to Ultrafine Particles (UFPs), and the Proposed Action is in compliance with the air quality analytical requirements for the NEPA process. While the evaluation of UFPs, on surrounding residential areas, is not specifically addressed as part of the NEPA EA process; it should be noted that areas in close proximity to airports do not generally have higher concentrations of hazardous air pollutants in ambient air than are found in typical urban environments. Because of the small diameter size of the UFP emissions, it should be understood that deposition tends to occur well away from the flight path as atmospheric forces such as wind and pressure disperse particulate away from the original aircraft emissions source.

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October 29, 2018

Environmental Science Associates  
Paine Field Supplemental EA  
5309 Shilshole Avenue NW, Suite 200  
Seattle, WA 98107

**Subject: Support for Commercial Air Service at Snohomish County Airport/Paine Field**

Dear Sirs:

Thales USA, Inc. wishes to express our strong support for commercial airline service to/from the Snohomish County Airport/Paine Field. Such service would dramatically improve our travel efficiency, increase productivity and reduce costs. And, considering the increasing commercial and residential growth north of Seattle, commercial airline service out of Paine Field is a very natural and necessary next step in the transportation infrastructure to both support the growth that has occurred thus far, as well as ensuring the region's continued development and prosperity.

Paine Field has been a vital part of the Snohomish County economy and infrastructure since the late 1930s. The airfield made contributions to the nation's defense during World War II, the Korean War, and the Cold War. In 1966, Paine Field was selected by Boeing as the manufacturing home for their Model 747 aircraft line. In short, Paine Field is a community asset and investment that has already paid for itself many times over. But, the true potential for Paine Field is far from being fully realized until it is able to offer commercial airline service. Such service would – in many cases – eliminate the need for air travelers to transit the highly congested Seattle traffic corridor driving to SeaTac International Airport, relieve some of the stress upon arrivals/departures from SeaTac and, as previously mentioned, serve as a continued economic driver to the entire area. Paine Field is well sized and already well equipped to support commercial air traffic and will require little if any additional infrastructure other than the terminal and parking facilities that have already been constructed.

Our business and employees are highly affected by what happens with Paine Field. We trust that both the governments and citizens that determine the future of this airport will recognize and appreciate the its importance and continue to assure that it is used to the fullest possible extent for the benefit of everyone who lives and works in the surrounding area.

Sincerely yours,



**Scott E. Brandenburg**

Vice President – Boeing Business Unit

Thales USA, Inc.  
808 134th Street SW  
Building B, Suite 213  
Everett, WA 98204

Office: +1 949 790-2806  
Mobile: + 1 206 403-0205  
e-Mail: [scott.brandenburg@us.thalesgroup.com](mailto:scott.brandenburg@us.thalesgroup.com)

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## **Response to Comment**

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Dear Scott Brandenburg:

Thank you for your comments regarding the Proposed Action at Paine Field.

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---

To whom it may concern,

I would like to strongly speak in favor of starting commercial flights from Paine Field ASAP.

I live on North Whidbey Island. Getting to SeaTac airport requires going through Seattle which has rush hour conditions for several hours morning and afternoon. Sometimes the traffic never really clears mid day so it's near constant rush hour conditions.

Instead of SeaTac, it would be so much better to be able to travel to Everett and take flights to popular destinations from there. It would literally save at least an hour each way (no traffic) and most times at least two hours more each way. Let's take some traffic off already overloaded I-5 in Seattle.

There are large capacity roads that already travel from I-5 to Paine Field so the impact of increased car traffic in the area would be minimal.

The North Sound is and has been a major growth area. We need a commercial airport that services this community.

Thank you,

Mike Henderson  
Whidbey Island

---

## **Response to Comment**

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Dear Mike Henderson:

Thank you for your comments regarding the Proposed Action at Paine Field.

---

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Hello!

We heard you are needing more public support for the commercial flights out of Paine Field. It would be amazing for us on Whidbey Island. My husband has traveled almost 75k this year and we would gladly take that business to Paine Field because it would be much more convenient.

Thank you again!

Kelsey

[www.tennisonfilms.com](http://www.tennisonfilms.com)

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## **Response to Comment**

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Dear Kelsey:

Thank you for your comments regarding the Proposed Action at Paine Field.

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As a Snohomish County resident for over 33 years I totally support the commercial air travel from Paine Field. The total number of proposed flights are miniscule compared to Sea-Tac, but will bring some relief to air travelers who want to use Paine Field to fly to serviced destinations.

Travelling to Sea-Tac to board a commercial flight can take longer than the flight itself. The drive time to Sea-Tac is also a factor in the already horrific congestion our region is experiencing. Traffic congestion is increasing and will only increase. Therefore, the commercial flights from Paine Field will help alleviate some of the traffic congestion from Marysville to Sea-Tac.

With this slight increase in the number of airline flights for commercial service, the noise impacts will be minimal with regards to the continued growth in our area. I urge support for the commercial air service from Paine Field and look forward to using it to improve my stress, time and cost of having to drive to Sea-Tac.

Barry N Martin  
Granite Falls Washington

Sent from [Mail](#) for Windows 10

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## **Response to Comment**

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Dear Barry Martin:

Thank you for your comments regarding the Proposed Action at Paine Field.

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Paine Field is extremely under utilized. I'm a commercial Pilot and I see this every time I take my General Aviation Airplane in to Paine Field.

When I do need to fly out commercially it takes forever to get to Sea - Tac Airport. Help relieve the amount of cars going through Seattle.

The Terminal is Built, bring jobs and businesses to Snohomish County. Get the Boeings Flying commercially in to and out of Paine!

*Blue Skies*

Gregg Ortega

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## **Response to Comment**

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Dear Gregg Ortega:

Thank you for your comments regarding the Proposed Action at Paine Field.

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As a resident of Mukilteo, I am very much against commercial air flights in our vicinity. My husband is a retired naval aviator, but there are enough flights over our community and traffic has increased dramatically since we moved here from the Bay Area- near San Jose. We lived in the Bay Area 40 years and saw the San Jose airport become a huge international airport over the years. Although we lived in Sunnyvale, friends living in the flight paths were reimbursed for putting in more insulation and new windows to decrease the noise. This may happen here and who will pay? Traffic here is becoming like Seattle and I was appaled to learn that flights are scheduled 18 hours a day. We all know this is just the beginning of the impact on our community and life style here.

We were assured that this would not happen when we bought our home. Once the flights begin, there will be no end to the increases and lower property values. I would not mind what is planned now as we fly to California frequently and would find it convenient. My major concern is seeing the FAA allowing more and more flights in and out of our nice community. Thank you for addressing this issue. My opinion is shared by most of our neighbors as well- most are affiliated with Boeing.

Sincerely, Bev Lundgaard

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## Response to Comment

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Dear Bev Lundgaard:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### **General Responses**

- 1-2: Scope of the Supplemental EA Analysis for Future Operations and Passengers
  - 3-6: What Are the Existing and Future Noise Impacts?
  - 5-1: Existing and Future Traffic
  - 6-1: What are the Quality of Life Impacts?
  - 6-2: What is the Impact on Property Values?
  - 6-11: Mitigation
- 
-

Comment from Steve Tollefson, October 29, 2018

I appreciated this meeting, there were about 200 citizens in attendance and about thirty of us were able to speak publically.

Those speaking in favor, the city of Everett, the Snohomish County Council, the Everett City Council, the Snohomish Economic Council and several private citizens praised the economic benefits and convenience of this new service.

However, the larger majority that spoke in opposition were just concerned citizens living in close proximity to Paine Field.

Most of those in opposition sited concerns about noise, pollution and loss of home values or quiet lifestyles as reasons for their opposition.

While many in attendance last night agreed that having commercial flights from Paine Field beginning in early 2019 will be convenient, a majority said this decision by the FAA was rushed for final approval. Most in opposition said “slow down” and do this right with a new EIS!

They felt that despite this hearing, their voices were not being heard and the decision was made more for economic reasons than concerns about the environment.

I was able to speak at the hearing and said Whidbey Island was the forgotten neighbor to the west, meaning that we were excluded from any part of the original EIS in 2012 or this current EA.

I used the FAA term “errors of omission” as I spoke to say that Whidbey Island was ignored/omitted because we were never included in any of their previous studies. Why was this?

I also said that while I was not in strict opposition, I was concerned about the impact these future commercial flights vectored over Whidbey Island will have on us. This was because these new flight paths over us have not been addressed in any of the previous studies.

I said 65-thousand people live on Whidbey Island and we were concerned about noise and loss of our quiet island lifestyle as the Paine Field Commercial Flights begin.

I obtained contact information from the following individuals: Cayla Morgan one of the FAA Representatives present from Paine Field ([cayla.morgan@fra.gov](mailto:cayla.morgan@fra.gov))

Steven Alverson Senior Vice President for ESA Airports & project Director for the Environmental Assessment ([salverson@esassoc.com](mailto:salverson@esassoc.com))

Headquarters, Sacramento California

I hope they can assist me to discover why Whidbey Island has not been included in any of their past studies?

I also strongly support a new and robust Environmental Impact Study that includes Whidbey Island.

Thanks, I look forward to hearing from you,

Sincerely, Steve Tollefson

8256 Tideland Way, Clinton WA 98236

[stevetollefson@gmail.com](mailto:stevetollefson@gmail.com)

Cell: 206-992-3870

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## Response to Comment

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Dear Steve Tollefson:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### **General Responses**

1-5: Additional Study Should Be Conducted

1-6: Draft Supplemental EA Did Not Reflect the Opposition of the Community

1-7: Study Areas

3-6: What Are the Existing and Future Noise Impacts?

6-1: What are the Quality of Life Impacts?

6-2: What is the Impact on Property Values?

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**From:** [jndkimble@wavecable.com](mailto:jndkimble@wavecable.com) <[jndkimble@wavecable.com](mailto:jndkimble@wavecable.com)>  
**Sent:** Tuesday, October 30, 2018 1:56 PM  
**To:** Paine Field <[painefield@esassoc.com](mailto:painefield@esassoc.com)>  
**Subject:** Proposal to increase Paine Field Air Traffic Over Kitsap County  
**Importance:** High

**October 30, 2018**

**Sent Via E-Mail**

**Environmental Science Associates**

**Paine Field Supplemental EA**

**5309 Shilshole Ave NW, Suite 200**

**Seattle, WA 98107**

**Dear Environmental Associates:**

**As I sit here in my waterfront family home in Manchester I can already here commercial jet traffic passing over Bainbridge Is. and points North and South of Seattle Metro. The last thing we want or need is more commercial flights passing over Kitsap County. We just found out about this flight path change proposal. We are pretty sure many here in Kitsap County are unaware of what you are proposing. We are 110% against FFA allowing Alaska Airlines, United Airlines, Inc., and Southwest Airlines Co., and all other carriers to commence scheduled commercial airline service to Snohomish County Airport/Paine Field that will fly over Kitsap County.**

**I have looked over the sections of the proposal, EA with special attention to noise. Twenty or more (which I assume will be more than twenty in time) flights, per day, is unacceptable to be sending over quite, serene, and currently peaceful Kitsap County communities. Allowing these flights poses an extremely negative impact to current tourism for Kitsap County. People in there homes who cannot afford to sell and leave would be most negatively impacted. We don't want to leave here because commercial airlines want to make more money, and without any concerns by them to how their 'business' activities will negatively effect our communities. This plan will do nothing for Kitsap County, it would most certainly diminish the quality of life for those of us who live and work in Kitsap County. We moved her to get away from this sort of noise pollution. The number**

of flights passing over us from SEATAC is already to many, and we have noted those have increased.

In short NO, NO, NO! We do not support increased flights going over Kitsap County. Constant daily noise is not why we moved here. We have been here since 1969 and this does come up from time to time. These airline carriers care nothing about our quality of life here in Kitsap County. This is all about business and making more profits for them. And all at the expense of our loss of peace and quiet and the attraction this County has to bring in tourism. No one wants to sit on a beach, in a boat, and listen to flight after flight of jets taking off and landing from Paine field. We would be in the bull's-eye of the flight pattern noise wise.

Bainbridge Is. is of course part of Kitsap County, and they do have the money to mount an appeal to the EA, and do more to stop this. They will all be saying NO, NO, NO to more flights passing over their neighborhoods. Find another route that does not impact Kitsap County. I hope this is clear enough so that the FFA clearly understands we are dead set against this flight path plan change. The volume of flights will harm our economy in Kitsap County, no one will want to raise families here. No one will want to visit and spend their tourist dollars here. The additional noise is not merely 'white noise' it is unhealthy for those forced to live under it, around it. We do not need this change and we will be contacting our legislators to protest this proposal.

Sincerely,

A handwritten signature in black ink that reads "David A. Kimble". The signature is written in a cursive style with a clear, legible font.

David Kimble  
PO Box 85  
Manchester, WA

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## Response to Comment

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Dear David Kimble:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### General Responses

1-7: Study Areas

3-1: Existing Aircraft Noise Concerns

3-6: What Are the Existing and Future Noise Impacts?

6-1: What are the Quality of Life Impacts?

Please also see the following individual response.

### Impacts to Kitsap County Tourism

Following FAA Order 1050.1F, 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 Action would not generate significant aircraft noise exposure. No homes, businesses, or other community resources would need to be relocated (see Section 6.11 of the FSEA).

The closest point of Kitsap County land is located approximately 10+ miles from Paine Field. The Proposed Action includes 24 round-trip (48 total: 24 arrivals and 24 departures operations a day). Without the Proposed Action, Paine Field has nearly 150 round-trip (300 total) operations a day in both 2019 and 2024. As shown in Figure F-1, the aircraft flying to/from Paine Field fly in all directions. It is extremely unlikely that all 24 flights would arrive and depart over Kitsap County on any given day.

The decision makers, airport sponsors, and city officials have carefully weighed potential impacts to the current environment against the overall benefits of the Proposed Action. Comment letters were received from several local cities, and are included in Appendix H-2. Furthermore, offering commercial flights at Paine Field would increase passenger enplanements and could increase the potential for additional tourism activity in Kitsap County.

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**From:** Neal & Carolyn <[cmfnet@comcast.net](mailto:cmfnet@comcast.net)>  
**Sent:** Tuesday, October 30, 2018 2:24 PM  
**To:** Paine Field <[painefield@esassoc.com](mailto:painefield@esassoc.com)>  
**Subject:** Pain Field SEA comment

To Whom it May Concern,

I am very concerned about your predetermined findings of “no impact” on our environment, our traffic, and our community. As anyone who lives in Mukilteo already knows, traffic is a mess during certain hours, especially around Boeing shift changes. How can you tell us that adding hundreds more travelers during that time will not affect traffic? How was this determined?

Why wasn't a more comprehensive EIS conducted? What do you mean by significant impact? How is that determined?

I live at the edge of the Japanese Gulch and can tell you that we are rocked out of bed by many of the louder aircraft. What are you going to do/require to assure that we will not have any “significant impact” as we are awoken each night by loud aircraft?

How many more flights can be added before you go thru this farce of a study again?

Where exactly did you do sound studies to show no significant impact? Did you put sound monitors in ME or OV? Kamiak? Near Japanese Gulch?

Are flight hours going to be restricted?

Where were sensors put for pollution to show your outcome?

Why did you limit the public input to only one meeting?

I would honestly like answers to these questions and know clearly how this was determined and what recourse we have when we DO have significant impacts on our quality of life.

Thanks for your time.

Neal Thatcher  
1010 8<sup>th</sup> St.  
Mukilteo WA 98275

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## Response to Comment

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Dear Neal Thatcher:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### **General Responses**

- 1-2: Scope of the Supplemental EA Analysis for Future Operations and Passengers
  - 1-4: Adequacy of Public Involvement and Public Hearing
  - 1-5: Additional Study Should Be Conducted
  - 1-8: Significance of Project Impacts
  - 1-9: How Is Significance Defined?
  - 3-1: Existing Aircraft Noise Concerns
  - 3-3: Noise Measurements and Supplemental Metrics Requested
  - 3-9: Request for Noise Curfew/Activity Restrictions
  - 4-1: Sources of Existing Air Pollution
  - 5-1: Existing and Future Traffic
  - 6-11: Mitigation
- 
-

**From:** Katherine Rowe <[katherine.rowe@hotmail.com](mailto:katherine.rowe@hotmail.com)>  
**Sent:** Tuesday, October 30, 2018 3:13 PM  
**To:** Paine Field <[painefield@esassoc.com](mailto:painefield@esassoc.com)>  
**Subject:** Paine Field - Public Input

Dear sirs:

I would like to offer comments regarding passenger flights to and from Paine Field in Everett, WA. I write as a mother, daughter, caregiver, business traveler, and community supporter.

Recently, I had the privilege of touring the new PAE passenger terminal. While features such as a full-service bar, glass jetways, and Northwest design theme are quite wonderful, what struck me most was the ideal nature of the small terminal for two groups of flyers who will benefit enormously from that experience--senior citizens and travelers with disabilities.

My son has autism. While he finds SeaTac airport fascinating in some ways, he also finds it overwhelming, intrusive, and chaotic. Being able to fly from PAE will offer ideal conditions for both arrival and departure and will enable him to comfortably travel anywhere on his own. The small size of the terminal will provide an outstanding experience for many travelers with special needs, allowing them comfortable access to the nation's air system. The customer-friendly valet service at the curb will also reduce stress and confusion.

Senior citizens are another group that will be well served by the new PAE terminal. I am the person who takes my elderly father to SeaTac when he wants to travel. That airport is enormous, and it makes him feel confused. There are so many walkways, so many people to interact with, it undermines his confidence and he literally cannot navigate it by himself, yet he is unwilling to request assistance. It's also exhausting to work his way through all the hurdles; he's tired when he gets to the gate. I absolutely know he will love traveling to and from Everett, which will enhance his connection with the community and with his friends in far-away places. He is a former military aviator and will find the passenger experience there to be "like the good old days".

I am grateful that Propeller Airports and Paine Field have figured out how to partner. I expect and appreciate the FAA's support of this innovative approach. Any impacts to ARFF, tower operations, snow and ice removal, or other airport activities can surely be addressed if they haven't been already. Perhaps Paine can be a model for other U.S. airports, especially small ones, to demonstrate that government and private business can each do what they're good at and create a win-win for the public at a scale that works.

It's exciting to think of not having to travel to SeaTac as much in the future. Puget Sound traffic has created a 90-minute commute to get there, plus a 90-minute buffer for TSA, baggage check, and other tasks to endure, meaning we from eastern Snohomish County can easily waste 2/3 of a day just getting to San Francisco (a short flight). I expect Paine Field will meet this need

in less than 3 elapsed hours, which not only benefits me, it benefits other drivers anytime I'm not driving to SeaTac.

I support prompt approval for the launch of passenger service at Paine Field.

Sincerely,

Katherine Rowe

Monroe, WA

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## **Response to Comment**

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Dear Katherine Rowe:

Thank you for your comments regarding the Proposed Action at Paine Field.

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# Comment Form

**Snohomish County Airport/Paine Field  
Draft Supplemental Environmental Assessment  
Public Information Workshop  
Monday, October 29, 2018**

Name: Alicia Higgins  
 Address: 17212 Sealawn Place  
Edmonds WA 98026  
 Phone or  
 Email: aliciahiggins13@gmail.com

Please provide comments in the area below. (See back or attach additional sheets if necessary):

On occasions planes fly very low going west over my home. I can see the pilot practically and the windows are above and basically at the tree tops — it makes me feel the pilot has made an error to be so low (going west) — it is alarming — with an increase in the number of flights it will really be objectionable! I have commented online when it has occurred!

The comment period ends on November 2, 2018. Comments may be submitted at the Public Information Workshop or to the following addresses:

EMAIL: [PaineField@esassoc.com](mailto:PaineField@esassoc.com)

MAIL: ENVIRONMENTAL SCIENCE ASSOCIATES  
 PAINE FIELD SUPPLEMENTAL EA  
 5309 SHILSHOLE AVE NW, SUITE 200  
 SEATTLE, WA 98107

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## Response to Comment

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Dear Alicia Higgins:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general response that applies to your comment.

### **General Response**

2-4: Aircraft Currently Fly Low and Very Close to Houses

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# Comment Form

## Snohomish County Airport/Paine Field Draft Supplemental Environmental Assessment Public Information Workshop

Monday, October 29, 2018

Name: Amy Johnson

Address: 17210 43rd Pl W 98037

Phone or Email: amy3tree@comcast.net

Please provide comments in the area below. (See back or attach additional sheets if necessary):

What are the anticipated flight paths?  
And, projected times of day?

The comment period ends on November 2, 2018. Comments may be submitted at the Public Information Workshop or to the following addresses:

EMAIL: [PaineField@esassoc.com](mailto:PaineField@esassoc.com)

MAIL: ENVIRONMENTAL SCIENCE ASSOCIATES  
PAINE FIELD SUPPLEMENTAL EA  
5309 SHILSHOLE AVE NW, SUITE 200  
SEATTLE, WA 98107

---

## Response to Comment

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Dear Amy Johnson:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### **General Responses**

1-2: Scope of the Supplemental EA Analysis for Future Operations and Passengers

3-5: Where are Flight Tracks Shown?

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# Comment Form

## Snohomish County Airport/Paine Field Draft Supplemental Environmental Assessment Public Information Workshop

Monday, October 29, 2018

Name:

Amy Johnson #2

Address:

17210 43rd St W 98037

Phone or  
Email:

amy3tree@comcast.net

Please provide comments in the area below. (See back or attach additional sheets if necessary):

Was light rail/public transportation taken into account when noting projected "pollutants" in 2024?

The comment period ends on November 2, 2018. Comments may be submitted at the Public Information Workshop or to the following addresses:

EMAIL: [PaineField@esassoc.com](mailto:PaineField@esassoc.com)

MAIL: ENVIRONMENTAL SCIENCE ASSOCIATES  
PAINE FIELD SUPPLEMENTAL EA  
5309 SHILSHOLE AVE NW, SUITE 200  
SEATTLE, WA 98107

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## Response to Comment

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Dear Amy Johnson:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general response that applies to your comments.

### **General Response**

4-1: Sources of Existing Air Pollution

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Main concerns -

Process setup to make Taxpayer subsidize ops

2. Why wasn't a more comprehensive EIS conducted, instead of the streamlined Environmental Assessment, given the magnitude of this change?

Why no public input on scope  
why aren't all conceivable project impacts studied (Alaska United project) Larger aircraft  
Before started - doubled flights

3. Why weren't more public hearings than one held?

9. Does the assessment take into account the effect of low flight paths due to interaction with SeaTac flight paths?

4. What criteria defines what a significant impact is?

5. What assurances are there that the cumulative impacts of all scheduled service will be assessed with any increase in operations? The FAA and Snohomish County are trying to establish a precedent which will allow incremental growth over time without any assessment of the impacts to the surrounding area. This is wrong and bordering on criminal. The FAA and Snohomish County need to comply fully with the letter and spirit of the law requiring a comprehensive and objective assessment of all impacts with business interests set aside.

This approach avoids cumulative

6. What assurances are there that mitigation of impacts will be paid for solely by Propeller Aviation and the operating airlines and not the taxpayer?

What assurances the identified mitigations will actually be paid? → Shoreline never got SeaTac mitigation promised

1. Crime will undoubtedly increase. Who will be responsible for addressing this increase?

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## Response to Comment

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Dear Commenter:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### **General Responses**

- 1-2: Scope of the Supplemental EA Analysis for Future Operations and Passengers
  - 1-4: Adequacy of Public Involvement and Public Hearing
  - 1-5: Additional Study Should Be Conducted
  - 1-8: Significance of Project Impacts
  - 1-9: How Is Significance Defined?
  - 6-3: What is the Impact of the Proposed Action On Crime?
  - 6-8: Cumulative Impacts
  - 6-11: Mitigation
- 
-



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## **Response to Comment**

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Dear Commenter:

Thank you for your comments regarding the Proposed Action at Paine Field.

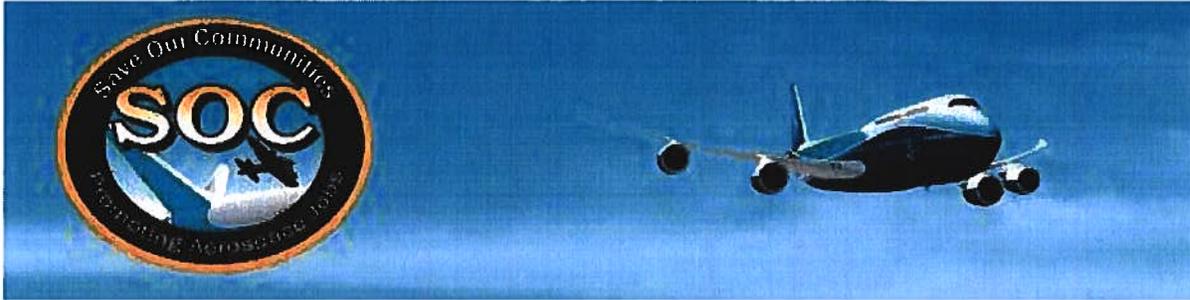
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P38

Submitted by Andrew Skotdahl

**From:** "Save Our Communities" <[info@socnw.org](mailto:info@socnw.org)>  
**Date:** October 27, 2018 at 12:00:18 AM PDT  
**To:** [REDACTED]  
**Subject:** Talking Points for Public Hearing  
**Reply-To:** [info@socnw.org](mailto:info@socnw.org)



Dear

### **Help Support Our Efforts!**

Please help support our communities today by making an online contribution.  
We are a 100% volunteer organization.

[Donate Here!](#)

Friends,

### **Stand Up for our communities on Monday October 29th, 6:30 PM!**

Join us to stand up for our communities at the FAA public hearing on the [Supplemental Environmental Assessment](#) for scheduled commercial flights at Paine Field. The Public Information Workshop/Public Hearing will be held Monday, Oct. 29, 2018 at the Lynnwood Convention Center, at 3711 196th St SW, Lynnwood, WA 98036, from 5:30 PM to 8:30 PM, with the Public Hearing portion beginning at 6:30 PM.

Acceptance of the Supplemental Assessment has a huge impact for our communities. We need

you to show up and give public comment to be on the record in opposition to the incomplete, flawed assessment. If you don't feel comfortable speaking, come and help make our collective presence known. You also have until November 2nd to submit written comments.

The fix is in and we cannot stop commercial flights at Paine Field, but we must make our voices heard! Remember, any amount of money required for mitigation of the negative impacts not paid for by Propeller will be paid by us, the taxpayers.

Please attend Monday's hearing and also consider speaking in opposition to this round of "death by a thousand cuts". The FAA and County have this set up to allow incremental growth over time with the predictable finding of "no significant impacts" associated with starting and growing scheduled service. The FAA/County approach fails to identify all the impacts and mitigation measures that need to be implemented. They need to fully comply with the letter and spirit of the law requiring a comprehensive and objective assessment of all impacts. We need to point that out...again!

If you choose to speak on Monday night, here are our suggestions:

1. Sign up to speak, and your name will be called in the order you signed up.
2. Identify yourself, and if you're commenting on behalf of a group, name the organization you represent.
3. Be clear about what you oppose and what your concerns are. Here are some suggestions:
  - First, form your points into questions to force them to answer (they will not answer Monday, but will address questions in written form)
  - Why wasn't a more comprehensive EIS conducted given the magnitude of this change (they conducted a streamlined Environmental Assessment and a Supplemental without any public input on the scope of study)
  - Why only hold one public hearing when so many less impactful projects today hold multiple public hearings to ensure public input?

- What criteria defines what a significant impact is? It is obvious to the majority of impacted citizens that starting scheduled commercial service at Paine Field (or any airport) will produce many impacts that will grow as scheduled service grows.
- What assurances are there that the cumulative impacts of all scheduled service will be assessed with any increase in operations?
- We will definitely make the above points so either repeat them in your own words or pick your key issues and ask specific questions about how they concluded no significant impacts to your issues of concern: schools, traffic, noise, home value reduction leading to increased tax rates to cover less tax revenue, loss of home equity, conversion of home ownership to rentals, airport type of unwanted businesses generating unwanted activities and more public services and costs and so many more.

4. Speak from your own experience and perspective.

5. Use your time well. Comments will likely be limited to 3 to 5 minutes per person.

6. Be respectful and courteous.

If you prefer to submit written comments, all written comments may be provided at the Public Information Workshop/Public Hearing or submitted to [PaineField@esassoc.com](mailto:PaineField@esassoc.com) or to the following address through Nov. 2, 2018:

Environmental Science Associates

Paine Field Supplemental EA

5309 Shilshole Ave NW, Suite 200

Seattle, WA 98107

**Thank you for your public service!**

Regards,

Save Our Communities

[socnw.org](http://socnw.org)

**Please share this**



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If you received this message from a friend and would like to subscribe, please [click here](#).

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## Response to Comment

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Dear Andrew Skotdal:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### **General Responses**

- 1-4: Adequacy of Public Involvement and Public Hearing
  - 1-5: Additional Study Should Be Conducted
  - 1-8: Significance of Project Impacts
  - 1-9: How Is Significance Defined?
  - 3-6: What Are the Existing and Future Noise Impacts?
  - 3-7: Noise Impacts on Schools
  - 5-1: Existing and Future Traffic
  - 6-2: What is the Impact on Property Values?
  - 6-3: What is the Impact of the Proposed Action On Crime?
  - 6-8: Cumulative Impacts
- 
-

# Comment Form

**Snohomish County Airport/Paine Field  
Draft Supplemental Environmental Assessment  
Public Information Workshop  
Monday, October 29, 2018**

Name: Betsy & Dave HARRIS

Address: 15026 72nd Ave W.  
Edmonds, Wa 98026

Phone or Email: windrush1@comcast.net

Please provide comments in the area below. (See back or attach additional sheets if necessary):

Is there any mitigation for residential noise  
improvements ie triple pane windows.

The increase in noise during day recently  
is ~~the~~ loud enough it scares my hunting  
dog (who is used to loud noises. This is  
unacceptable.

The comment period ends on November 2, 2018. Comments may be submitted at the Public Information Workshop or to the following addresses:

EMAIL: [PaineField@esassoc.com](mailto:PaineField@esassoc.com)

MAIL: ENVIRONMENTAL SCIENCE ASSOCIATES  
PAINE FIELD SUPPLEMENTAL EA  
5309 SHILSHOLE AVE NW, SUITE 200  
SEATTLE, WA 98107

---

## Response to Comment

---

Dear Betsy and Dave Harris:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### **General Responses**

3-1: Existing Aircraft Noise Concerns

3-6: What Are the Existing and Future Noise Impacts?

6-11: Mitigation

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# Comment Form

**Snohomish County Airport/Paine Field  
Draft Supplemental Environmental Assessment  
Public Information Workshop  
Monday, October 29, 2018**

Name: Barbara Grimes  
Address: Mukilteo WA  
Phone or Email: bfg.grimes@gmail.com

Please provide comments in the area below. (See back or attach additional sheets if necessary):

- Flight take-offs should be allowed only prior to 9pm

- Landings are less noisy and can be allowed later.

- Traffic Mitigation is NOT sufficient especially on over flow traffic North bound on 525.

The comment period ends on November 2, 2018. Comments may be submitted at the Public Information Workshop or to the following addresses:

EMAIL: [PaineField@esassoc.com](mailto:PaineField@esassoc.com)

MAIL: ENVIRONMENTAL SCIENCE ASSOCIATES  
PAINE FIELD SUPPLEMENTAL EA  
5309 SHILSHOLE AVE NW, SUITE 200  
SEATTLE, WA 98107

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## Response to Comment

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Dear Barbara Grimes:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### **General Responses**

3-9: Request for Noise Curfew/Activity Restrictions  
5-1: Existing and Future Traffic  
5-2: Traffic Analysis  
6-11: Mitigation

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# Comment Form

## Snohomish County Airport/Paine Field Draft Supplemental Environmental Assessment Public Information Workshop Monday, October 29, 2018

Name: Brian St Clair

Address: ~~1500 1st St~~ ~~267 Alderson Pl~~ 267 Alderson Pl  
Burlington, WA 98233

Phone or Email: 509-594-1595

Please provide comments in the area below. (See back or attach additional sheets if necessary):

Personally, I'm very excited for this airport. It's going to save me a lot of time & hassle driving to Seatac. People don't realize that Paine field is already an active airport. I see & hear a ton of "FedEx large industrial planes, "Qatar" planes, dreamliners, etc., not to mention sometimes military jets & Black hawks fly in. These commercial planes won't be any louder, and I'll actually benefit from them. The added pollution from the planes I'm sure is offset by what ground traffic would cause having to drive to seatac.

The comment period ends on November 2, 2018. Comments may be submitted at the Public Information Workshop or to the following addresses:

EMAIL: [PaineField@esassoc.com](mailto:PaineField@esassoc.com)

MAIL: ENVIRONMENTAL SCIENCE ASSOCIATES  
PAINE FIELD SUPPLEMENTAL EA  
5309 SHILSHOLE AVE NW, SUITE 200  
SEATTLE, WA 98107

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## **Response to Comment**

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Dear Brian St. Clair:

Thank you for your comments regarding the Proposed Action at Paine Field.

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# Comment Form

## Snohomish County Airport/Paine Field Draft Supplemental Environmental Assessment Public Information Workshop Monday, October 29, 2018

Name: CHRIS LANG  
 Address: 5912 AKTIST DR.  
FRINDALE, WA 98248  
 Phone or Email: 360.391.0954

Please provide comments in the area below. (See back or attach additional sheets if necessary):

THE ADDITION OF THE PAINE FIELD PASSENGER TERMINAL IS A LONG OVERDUE OPTION FOR COMMUTERS TO SEATTLE. THIS WILL REDUCE TRAFFIC ON I-5. ADDITIONALLY, THE PASSENGER TERMINAL WILL CREATE JOBS FOR THE AREA. THE AIRFIELD HAS BEEN HERE FOR A LONG TIME, SO ADDING THE TERMINAL AT PAINE IS A NATURAL FIT. I TRUST THE DEVELOPER HAS FOLLOWED ALL CODES & REGULATIONS W/ CONSTRUCTION AND STUDIES FOR EAS HAVE BEEN SATISFIED FAVORABLY.

The comment period ends on November 2, 2018. Comments may be submitted at the Public Information Workshop or to the following addresses:

EMAIL: [PaineField@esassoc.com](mailto:PaineField@esassoc.com)

MAIL: ENVIRONMENTAL SCIENCE ASSOCIATES  
PAINE FIELD SUPPLEMENTAL EA  
5309 SHILSHOLE AVE NW, SUITE 200  
SEATTLE, WA 98107

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## **Response to Comment**

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Dear Chris Lang:

Thank you for your comments regarding the Proposed Action at Paine Field.

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# Comment Form

**Snohomish County Airport/Paine Field  
Draft Supplemental Environmental Assessment  
Public Information Workshop  
Monday, October 29, 2018**

Name: Darlene Brawford  
Address: 2031 Veram Rd 1/2 Stevens, WA 98258  
Phone or Email: 425-334-5930

Please provide comments in the area below. (See back or attach additional sheets if necessary):

I am in favor of opening commercial flights at Paine Field. I'm looking forward to being able to take flights out of Paine Field. Paine Field has been there since 1935 - anyone moving to the area knew of the existence.

The comment period ends on November 2, 2018. Comments may be submitted at the Public Information Workshop or to the following addresses:

EMAIL: [PaineField@esassoc.com](mailto:PaineField@esassoc.com)

MAIL: ENVIRONMENTAL SCIENCE ASSOCIATES  
PAINE FIELD SUPPLEMENTAL EA  
5309 SHILSHOLE AVE NW, SUITE 200  
SEATTLE, WA 98107

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## **Response to Comment**

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Dear Darlene Brawford:

Thank you for your comments regarding the Proposed Action at Paine Field.

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# Comment Form

**Snohomish County Airport/Paine Field  
Draft Supplemental Environmental Assessment  
Public Information Workshop  
Monday, October 29, 2018**

Name: DENNIS BRAWFORD  
Address: 2031 VERNON RD  
LK. STEVENS, WA 98201  
Phone or Email: 425-334-5930

Please provide comments in the area below. (See back or attach additional sheets if necessary):

In favor of commercial flight at Paine. 300 jobs added benefits to all residents; plus time saved from driving to SEA-TAC. Snoh. county residents will receive superior air travel.

The comment period ends on November 2, 2018. Comments may be submitted at the Public Information Workshop or to the following addresses:

EMAIL: [PaineField@esassoc.com](mailto:PaineField@esassoc.com)

MAIL: ENVIRONMENTAL SCIENCE ASSOCIATES  
PAINE FIELD SUPPLEMENTAL EA  
5309 SHILSHOLE AVE NW, SUITE 200  
SEATTLE, WA 98107

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## **Response to Comment**

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Dear Dennis Brawford:

Thank you for your comments regarding the Proposed Action at Paine Field.

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# Comment Form

**Snohomish County Airport/Paine Field  
Draft Supplemental Environmental Assessment  
Public Information Workshop  
Monday, October 29, 2018**

Name: DARRELL L. Chapman  
Address: 12300 Scenic DR Edmonds, WA.  
9802  
Phone or Email: darrellc19@aol.com

Please provide comments in the area below. (See back or attach additional sheets if necessary):

Will ALASKA AIRLINES, Southwest,  
and UNITED, or at least one  
of them fly from the new  
Paine Field terminals to  
LAS VEGAS NV.?

The comment period ends on November 2, 2018. Comments may be submitted at the Public Information Workshop or to the following addresses:

EMAIL: [PaineField@esassoc.com](mailto:PaineField@esassoc.com)

MAIL: ENVIRONMENTAL SCIENCE ASSOCIATES  
PAINE FIELD SUPPLEMENTAL EA  
5309 SHILSHOLE AVE NW, SUITE 200  
SEATTLE, WA 98107

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## Response to Comment

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Dear Darrell Chapman:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following individual response to your comments.

### **Destinations**

As shown in Tables 1-2 and 1-4, a Las Vegas route would be operated by Alaska Airlines.

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**FOR YOUR INFORMATION...ON THE FAA ENVIRONMENTAL STUDY**

**THERE ARE SOME IMPORTANT PARTS THAT APPARENTLY HAVE BEEN LEFT OUT OR IGNORED!**

**THE IMPACT ON VEHICLE CONGESTION**

Over the last two years, thousands of people have decided to move north to the Marysville area and even further. The consequence has been a massive gridlock on I-5 south-bound starting between 6 to 9 am from south of Marysville through Everett all the way down to Seattle, lasting from 10:30 to 11:00 am. Hwy. 99 is not much help.

In the afternoon, at 2:30 it starts to block up from Seattle all the way to North of Marysville. South of Everett, at 3:00 pm it becomes a virtual PARKING LOT. It does not improve until about 6:00 pm.

If the D.O.T. in all of their wisdom decides to do a little work, trimming or patching the road a back-up will last longer. They don't like to do the work at 8:30 or 9 pm.

State route 525 does not help much at these times.

Now we bring in the FERRY vehicle traffic going through Mukilteo, many times a day and late in the evening. Do you have any idea how many passengers are arriving and departing? in CARS! NO YOU DON'T!

Now you have the huge BOEING PLANT, thousands of employees coming and going at various times of the day and night.

At the present there is no rapid transit directly in the Paine Field area. If you think its only a couple of years away HA! You don't know a thing about Washington projects.

So let me get this right, you think its a very smart idea to bring in twenty four flights a day to Paine Field. So let's do the math.... 24 flights a day 200 plus passengers arriving and departing, on each flight, Hmm 24 times 400 = that's 9,600 passengers a day so if one third arrive in cars that's 3,200 cars added to the mix.

We have not considered service businesses in the area, restaurants, bars and most importantly HOTELS! Not much there now, but I'm sure they will go up quickly? After the the field is finished. Until then they will have to go into Everett, Lynnwood and Seattle, adding to the traffic JAMS!

The whole area has changed traffic wise, your previous studies are obsolete! if you don't believe me, tomorrow jump into your car at 7:30 am and head into Seattle, with your driver doing the work take along a good book!

Your very, very concerned Citizen. David C. Fowler, Lynnwood, WA

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## Response to Comment

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Dear David Fowler:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### **General Responses**

5-1: Existing and Future Traffic

5-2: Traffic Analysis

5-3: Ferry Operations

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# Comment Form

Snohomish County Airport/Paine Field  
Draft Supplemental Environmental Assessment  
Public Information Workshop  
Monday, October 29, 2018

Name: DAN POWERS  
Address: 510 17<sup>th</sup> PLACE  
MUKILTEO WA 98275  
Phone or Email: djoe.fisher@cgil.com

Please provide comments in the area below. (See back or attach additional sheets if necessary):

AS A 20 YEAR RESIDENT OF MUKILTEO I AM VERY  
EXCITED FOR THE OPENING OF THE PAINE FIELD  
AIRPORT. I TRAVEL A GREAT DEAL FOR WORK &  
THE AMOUNT OF TIME & HURRY I WILL SAVE  
WILL MAKE A DIFFERENCE IN MY LIFE. IT WILL CREATE  
NEW JOBS & SUPPORT BUSINESS IN THE AREA  
& IT IS A ~~REALLY~~ VERY NEAR & WILL DO  
BUILDING THE ADDD TRAFFIC WILL SAVE I-5  
TRAFFIC TO ~~THE~~ SRATEC. I LIVE IN THE FLIGHT  
PATH & KNOW THAT THERE ARE ALREADY HUNDREDS  
OF FLIGHTS PER WEEK & I HAVE NEVER REALLY  
EVEN NOTICED THE NOISE. THE AIRPORT WAS THERE  
LONG BEFORE ALL THE NEIGHBORHOODS & THIS IS  
NEEDED.

The comment period ends on November 2, 2018. Comments may be submitted at the  
Public Information Workshop or to the following addresses:

EMAIL: [PaineField@esassoc.com](mailto:PaineField@esassoc.com)

MAIL: ENVIRONMENTAL SCIENCE ASSOCIATES  
PAINE FIELD SUPPLEMENTAL EA  
5309 SHILSHOLE AVE NW, SUITE 200  
SEATTLE, WA 98107

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## **Response to Comment**

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Dear Dan Powers:

Thank you for your comments regarding the Proposed Action at Paine Field.

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# Comment Form

**Snohomish County Airport/Paine Field  
Draft Supplemental Environmental Assessment  
Public Information Workshop  
Monday, October 29, 2018**

Name: Dennis White  
Address: 4160 Possession Shores Road  
Clinton, WA 98236  
Phone or Email: 360 579 2786

Please provide comments in the area below. (See back or attach additional sheets if necessary):

The EA is insufficient because it does not:  
1) assess the impact of flight vectors over  
Whidbey Island, particularly as to noise; and  
2) it does not assess the impact of flights  
over schools on Whidbey Island

The comment period ends on November 2, 2018. Comments may be submitted at the Public Information Workshop or to the following addresses:

EMAIL: [PaineField@esassoc.com](mailto:PaineField@esassoc.com)

MAIL: ENVIRONMENTAL SCIENCE ASSOCIATES  
PAINE FIELD SUPPLEMENTAL EA  
5309 SHILSHOLE AVE NW, SUITE 200  
SEATTLE, WA 98107

---

## Response to Comment

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Dear Dennis White:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### **General Responses**

- 1-3: Flawed/Inadequate Supplemental EA
  - 1-5: Additional Study Should Be Conducted
  - 1-7: Study Areas
  - 3-7: Noise Impacts on Schools
- 
-

## Comment Form

**Snohomish County Airport/Paine Field  
Draft Supplemental Environmental Assessment  
Public Information Workshop  
Monday, October 29, 2018**

Name: Ed Clarke  
Address: 12808 49<sup>th</sup> Ave W Mukilteo  
Phone or Email: edwardjclarke@yahoo.com

Please provide comments in the area below. (See back or attach additional sheets if necessary):

Mukilteo over the last 10 years has  
seen a dramatic increase in traffic & pollution.  
We have also seen an increase in crime.

The infrastructure is not able to handle  
another couple thousand cars per day.  
Especially along the Mukilteo Speedway  
& Beverly Blvd.

Over 30,000 homes have been built around  
the airport in the last 30 years.

It's not the 20 flights a day we are  
worried about, but the 100 more  
that are sure to come.

This would spell the doom for Mukilteo  
Ed Clarke

The comment period ends on November 2, 2018. Comments may be submitted at the  
Public Information Workshop or to the following addresses:

EMAIL: [PaineField@esassoc.com](mailto:PaineField@esassoc.com)

MAIL: ENVIRONMENTAL SCIENCE ASSOCIATES  
PAINE FIELD SUPPLEMENTAL EA  
5309 SHILSHOLE AVE NW, SUITE 200  
SEATTLE, WA 98107

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## Response to Comment

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Dear Ed Clarke:

Thank you your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### **General Responses**

- 1-2: Scope of the Supplemental EA Analysis for Future Operations and Passengers
  - 5-1: Existing and Future Traffic
  - 6-3: What is the Impact of the Proposed Action on Crime?
  - 6-8: Cumulative Impacts
- 
-

# Comment Form

**Snohomish County Airport/Paine Field  
Draft Supplemental Environmental Assessment  
Public Information Workshop  
Monday, October 29, 2018**

Name: Erin M Corey  
 Address: 3216 180th PL SW  
Lynnwood WA 98037  
 Phone or  
 Email: e-orourke@hotmail.com

Please provide comments in the area below. (See back or attach additional sheets if necessary):

- Ⓐ Where are you dumping fuel in an emergency landing?
- Ⓑ Your reps at this meeting say the Airlines will not exceed 24 round-trip flights in the next 5 years... where is that in writing? Who do we sue when it's MORE than the 24 RT "you state" at this public comment meeting?

The comment period ends on November 2, 2018. Comments may be submitted at the Public Information Workshop or to the following addresses:

EMAIL: [PaineField@esassoc.com](mailto:PaineField@esassoc.com)

MAIL: ENVIRONMENTAL SCIENCE ASSOCIATES  
 PAINE FIELD SUPPLEMENTAL EA  
 5309 SHILSHOLE AVE NW, SUITE 200  
 SEATTLE, WA 98107

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## Response to Comment

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Dear Erin Corey:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### **General Responses**

1-2: Scope of the Supplemental EA Analysis for Future Operations and Passengers

2-5: Would there be an Increase in Fuel Dump/Fuel Smell/Residue?

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# Comment Form

**Snohomish County Airport/Paine Field  
Draft Supplemental Environmental Assessment  
Public Information Workshop  
Monday, October 29, 2018**

Name: Edward Goldenberg  
 Address: 5306 NE 20<sup>th</sup> Pl  
Lake Forest Pr, WA 98155  
 Phone or Email: 206-364-5698

Please provide comments in the area below. (See back or attach additional sheets if necessary):

Outside of Snohomish County  
 no studies of noise have been  
 conducted. I encourage a new  
 study to look at the noise  
 levels in Lake Forest Park, Wa.  
 The increase in noise may  
 reduce the value of homes  
 in the Lake Forest Park area.

The study was focused surrounding  
 Paine Field and the noise level.

The comment period ends on November 2, 2018. Comments may be submitted at the  
 Public Information Workshop or to the following addresses:

EMAIL: [PaineField@esassoc.com](mailto:PaineField@esassoc.com)

MAIL: ENVIRONMENTAL SCIENCE ASSOCIATES  
 PAINE FIELD SUPPLEMENTAL EA  
 5309 SHILSHOLE AVE NW, SUITE 200  
 SEATTLE, WA 98107

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## Response to Comment

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Dear Edward Goldenberg:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### **General Responses**

1-7: Study Areas

6-2: What is the Impact on Property Values?

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# Comment Form

**Snohomish County Airport/Paine Field  
Draft Supplemental Environmental Assessment  
Public Information Workshop  
Monday, October 29, 2018**

Name: Felicia Zaffiro  
Address: ~~11700 Mukilteo~~ 11700 Mukilteo Speedway  
Suite 201, Mukilteo, WA 98275  
Phone or Email: Flishose@yahoo.com

Please provide comments in the area below. (See back or attach additional sheets if necessary):

Very concerned in the impact on Traffic conditions as well as the noise level that is going to occur from having jets go over our homes.

There is no room for more traffic going in and out of the Payne field Traffic going in and out is too intense

Very concerned on all levels; we feel that Traffic study should have been done.

We have no "say"

The comment period ends on November 2, 2018. Comments may be submitted at the Public Information Workshop or to the following addresses:

EMAIL: [PaineField@esassoc.com](mailto:PaineField@esassoc.com)

MAIL: ENVIRONMENTAL SCIENCE ASSOCIATES  
PAINE FIELD SUPPLEMENTAL EA  
5309 SHILSHOLE AVE NW, SUITE 200  
SEATTLE, WA 98107

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## Response to Comment

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Dear Felicia Zaffiro:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### **General Responses**

1-6: Draft Supplemental EA Did Not Reflect the Opposition of the Community

3-6: What Are the Existing and Future Noise Impacts?

5-1: Existing and Future Traffic

5-2: Traffic Analysis

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# Comment Form

**Snohomish County Airport/Paine Field  
Draft Supplemental Environmental Assessment  
Public Information Workshop  
Monday, October 29, 2018**

Name: George and Darce / Siepak  
Address: 16714 - 71st Place W  
Lynnwood WA 98037  
Phone or Email: gsiepak@hotmail.com

Please provide comments in the area below. (See back or attach additional sheets if necessary):

BASED ON WHAT WE'VE SEEN WE WOULD RECOMMEND GOING  
AHEAD WITH 24 FLIGHTS PER DAY.  
BASED ON INFORMATION WE FEEL THE IMPACT WOULD  
BE NEGLIGIBLE AND MANAGEABLE.  
WE WOULD NOT RECOMMEND GOING TO AN INCREASE  
FROM 24 FLIGHTS A DAY.  
THERE ~~IS~~ IS A GREAT DEAL OF EMOTION INVOLVED  
WITH THIS PROJECT SO WE'D RECOMMEND LISTENING  
TO CONCERNS AND STRIVING TO MITIGATE.

The comment period ends on November 2, 2018. Comments may be submitted at the Public Information Workshop or to the following addresses:

EMAIL: [PaineField@esassoc.com](mailto:PaineField@esassoc.com)

MAIL: ENVIRONMENTAL SCIENCE ASSOCIATES  
PAINE FIELD SUPPLEMENTAL EA  
5309 SHILSHOLE AVE NW, SUITE 200  
SEATTLE, WA 98107

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## Response to Comment

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Dear George and Darcel Sicpak:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### **General Responses**

1-2: Scope of the Supplemental EA Analysis for Future Operations and Passengers

1-4: Adequacy of Public Involvement and Public Hearing

6-11: Mitigation

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**From:** Michael Murdock <[mikmur@icloud.com](mailto:mikmur@icloud.com)>  
**Sent:** Tuesday, October 30, 2018 8:14 PM  
**To:** Paine Field <[painefield@esassoc.com](mailto:painefield@esassoc.com)>  
**Subject:** Paine Field Opening and Increased Jet Noise Already

Good Afternoon,

I attended the open house at Lynnwood Convention Center based on concerns with increasing jet noise over Edmonds and northern communities already. We live in the Meadowdale area in Edmonds. The issue with noise is threefold. I commented both oral and written at the meeting.

First, increasing numbers of flights from Sea-Tac are sent west over Puget Sound and circle one right after the other over Edmonds and north communities and head south to Sea-Tac. This even occurs on Sunday nights for example often between 9:45 PM and well after 11:00 PM sometimes. My wife and I comment on this all the time we cannot be the only ones that hear it. It is very annoying and has increased.

Secondly, we have Boeing test flights crisscrossing the skyline with no apparent flight or height pattern at all hours. They have shaken the house a couple of times flying so low one can read the bottom of the plane. Once upon a time these flights seemed to observe some common respect for noise and residents. I support Boeing but these flights need to be managed for the sake of the community with patterns and times.

Thirdly, now Paine Field enters soon with more jets in an already unmanaged sky over our community. Who is steering the ship and looking out for the community? No one had answers about when airport will shut down at night or flight patterns. No answers to questions of how Paine flights will be handled with all the current traffic over our community. Sea-Tac currently sends flights to the north when winds blow from the south which is a good portion of the time. Will Paine do the same? John Wayne Orange County has noise ordinance and special pattern, and hours. Will Paine?

I realize the airport will happen, I get that. Our fear is that the failure will be in managing this threefold flight problem. No one seems to be addressing it. It is well documented in the Seattle Times regarding current Sea-Tac jet noise over communities and ongoing problems. My great concern is that we will join that list. If they are going to do an airport they need to do it right.

If any of you interact with anyone in committees at Paine or wish to bring up this issue anywhere please feel free to do so. It would be appreciated.

Thank you,

Mike Murdock

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## Response to Comment

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Dear Mike Murdock:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### **General Responses**

2-4: Aircraft Currently Fly Low and Very Close to Houses

3-1: Existing Aircraft Noise Concerns

3-9: Request for Noise Curfew/Activity Restrictions

5-1: Existing and Future Traffic

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# Comment Form

## Snohomish County Airport/Paine Field Draft Supplemental Environmental Assessment Public Information Workshop

Monday, October 29, 2018

Name: JOHN BROOKES

Address: 1220 6TH AVE S # B304  
EDMONDS WA 98020

Phone or  
Email: 425-778-2718

Please provide comments in the area below. (See back or attach additional sheets if necessary):

- NOISE OF EMBRAER 737 ARE LESS THAN CURRENT AIRCRAFT FLYING AT PAINE FIELD
- CUT DOWN ON AUTO TRAFFIC FROM SNO COUNTY TO SEATAC.
- EASE THE CONGESTION AT SEATAC.
- EASE THE TIME REQUIRED TO GET TO THE AIRPORT
- I BELIEVE USE OF PAINE BY COMMERCIAL AIRCRAFT WILL HAVE LITTLE IMPACT TO THE SURROUNDING AREA
- IT WILL BE A GREAT CONVENIENCE TO RESIDENTS FROM ARUNGTION TO SHURELINE

The comment period ends on November 2, 2018. Comments may be submitted at the Public Information Workshop or to the following addresses:

EMAIL: [PaineField@esassoc.com](mailto:PaineField@esassoc.com)

MAIL: ENVIRONMENTAL SCIENCE ASSOCIATES  
PAINE FIELD SUPPLEMENTAL EA  
5309 SHILSHOLE AVE NW, SUITE 200  
SEATTLE, WA 98107

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## Response to Comment

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Dear John Brookes:

Thank you for your comments regarding the Proposed Action at Paine Field.

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# Comment Form

**Snohomish County Airport/Paine Field  
Draft Supplemental Environmental Assessment  
Public Information Workshop  
Monday, October 29, 2018**

Name: JOY & FREDERIC BAUDART  
Address: 3612 167<sup>TH</sup> AVENUE SW  
LYNNWOOD, WA 98037  
Phone or  
Email: baudart@comcast.net

Please provide comments in the area below. (See back or attach additional sheets if necessary):

CAN YOU PLEASE PROVIDE US WITH INFORMATION ON  
REAL ESTATE & TAX ~~INFORMATION~~ IMPACT ON  
CURRENT & FUTURE RESIDENTS LIVING IN THE FLIGHT  
PATH & SURROUNDING THE CURRENT & FUTURE AIRPORT

Multiple horizontal lines for providing additional comments.

The comment period ends on November 2, 2018. Comments may be submitted at the Public Information Workshop or to the following addresses:

EMAIL: [PaineField@esassoc.com](mailto:PaineField@esassoc.com)

MAIL: ENVIRONMENTAL SCIENCE ASSOCIATES  
PAINE FIELD SUPPLEMENTAL EA  
5309 SHILSHOLE AVE NW, SUITE 200  
SEATTLE, WA 98107

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## Response to Comment

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Dear Joy and Frederic Baudart:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general response that applies to your comments.

### **General Response**

6-2: What is the Impact on Property Values?

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# Comment Form

**Snohomish County Airport/Paine Field  
Draft Supplemental Environmental Assessment  
Public Information Workshop  
Monday, October 29, 2018**

Name: Jodie Powers  
 Address: 510 17<sup>th</sup> Pl.  
 Phone or Email: powers510@comcast.net

Please provide comments in the area below. (See back or attach additional sheets if necessary):

As a Mukilteo resident of almost 20 years I am proud to make it my home. With the incoming airport I am thrilled for the chance to fly from a regional airport. Traffic alone will make it worth the proximity. We have lived in all areas of Mukilteo, the airport noise has never been a bother, and the impact of Boeing planes has been minimal. We do expect some noise but the airport has been around the area for a long time. The impact of the Paine Field terminal will be exciting & positive for our community.

The comment period ends on November 2, 2018. Comments may be submitted at the Public Information Workshop or to the following addresses:

EMAIL: [PaineField@esassoc.com](mailto:PaineField@esassoc.com)

MAIL: ENVIRONMENTAL SCIENCE ASSOCIATES  
 PAINE FIELD SUPPLEMENTAL EA  
 5309 SHILSHOLE AVE NW, SUITE 200  
 SEATTLE, WA 98107

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## **Response to Comment**

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Dear Jodie Powers:

Thank you for your comments regarding the Proposed Action at Paine Field.

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# Comment Form

Snohomish County Airport/Paine Field  
 Draft Supplemental Environmental Assessment  
 Public Information Workshop  
 Monday, October 29, 2018

Name: JERRY VERGERONY  
 Address: 2125 W. MUKINTO BLDG.  
EVERETT, WA  
 Phone or Email: 425-328-8736

Please provide comments in the area below. (See back or attach additional sheets if necessary):

1) WHO PAID FOR THIS STUDY?

2) WHEN LOOKING AT PROJECTED FLIGHTS, DID YOU PERFORM ANY ANALYSIS REGARDING THE VERACITY OF THE FAA TABLES OF THE PROJECTS SUPPLIED BY AIRLINE INDUSTRIES?

(E.g. DID YOU TAKE INTO CONSIDERATION IMPACTS OF NEW OR IMPROVING TRANSPORTATION SUCH A AUTONOMOUS CARS (MANY STUDIES REGARDING THE ~~SHORT~~ NEAR-TIME CREATION OF 150+ MPM AUTONOMOUS ROADS))

The comment period ends on November 2, 2018. Comments may be submitted at the Public Information Workshop or to the following addresses:

EMAIL: [PaineField@esassoc.com](mailto:PaineField@esassoc.com)

MAIL: ENVIRONMENTAL SCIENCE ASSOCIATES  
 PAINE FIELD SUPPLEMENTAL EA  
 5309 SHILSHOLE AVE NW, SUITE 200  
 SEATTLE, WA 98107

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## Response to Comment

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Dear Jerry Vergeront:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments

### **General Responses**

- 1-1: Adequacy and Use of FAA Guidance
- 1-5: Additional Study Should Be Conducted
- 5-2: Traffic Analysis

Please also see the following individual response.

### **Payment for Study**

The Environmental Assessment (EA) was paid for by the airlines proposing to initiate scheduled commercial service at PAE.

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October 29, 2019

Environmental Science Associates  
Paine Field Supplemental EA  
5309 Shilshole Ave NW, Suite 200  
Seattle, WA 98107

This public process has been flawed from the start. Snohomish County, with undue deference to business interests over residential communities, approved commercial service at Paine Field. They gave away a 50-year lease to Propeller for the airport terminal which in essence gives a free subsidy to the airlines. The extensive negative impacts commercial service will create to nearby homes, schools, churches, and parks have been completely disregarded.

The draft EA should be revised to include analyses for reasonably foreseeable, potential, and future impacts for at least the next 20-years if not for the entire life of the lease by Propeller. Otherwise, how will the floodgates be managed? Who will be watching over the airline companies to hold them to the current flight limits? At what point will we have any assurance of good faith by the County, FAA, Propeller or the airlines?

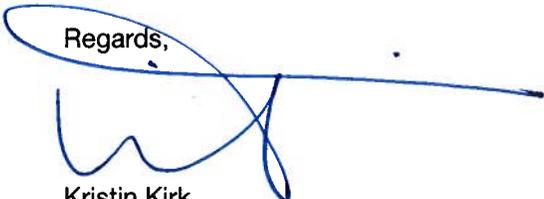
The draft EA scope and methodology are inadequate. The 65 DNL is a bad standard and the FAA knows it. A 50 DNL standard would more appropriately measure impacts for suburban, noise-sensitive uses. A revised draft EA should use site specific measurement locations for noise contouring instead of AEDT modeling. Of course, modeling is cheaper and easier - yet another FAA rule that supports business over communities. But, does the modeling approach take into account topography, bodies of water, land mass and other environmental occurrences specific to our area? At our home, we get stereo sound on both sides with a plane to the East and the noise bouncing off the Puget Sound and Whidbey Island to the West. I would like to know, what is the actual methodology for the AEDT modeling? Does it include natural features and topography?

The draft EA, along with this entire process, is flawed and has been weighted toward business interests from Day 1. Before we become SeaTac North, the County needs to withdraw its permit for the terminal and the FAA needs to be a good broker by requiring a full 20-year EIS to balance both business interests and the interests of the people and communities impacted.

Or, everyone could cut-to-the-chase and do what we all know needs to be done. Noise abatement and flight limits need to be established to mitigate all current and future impacts of the airport. Homes and schools will need extensive soundproofing. Nighttime flights should be eliminated altogether. Getting shaken out of bed by the Dreamlifter between 2 am and 4 am is bad enough - adding 9 more flights per night is unacceptable.

The developer and airline companies should pay for the impacts they are creating. We should not have to pay the bill with lower property values, increased health risk, and a diminished quality of life.

Regards,



Kristin Kirk  
Mukilteo, WA

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## Response to Comment

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Dear Kristin Kirk:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### **General Responses**

- 1-2: Scope of the Supplemental EA Analysis for Future Operations and Passengers
  - 1-4: Adequacy of Public Involvement and Public Hearing
  - 1-5: Additional Study Should Be Conducted
  - 3-2: Use of the DNL Metric
  - 3-4: Noise Analysis Methodology
  - 3-9: Request for Noise Curfew/Activity Restrictions
  - 3-10: Boeing 747 Dreamlifter Operations
  - 6-11: Mitigation
- 
-

# Comment Form

Snohomish County Airport/Paine Field  
Draft Supplemental Environmental Assessment  
Public Information Workshop  
Monday, October 29, 2018

Name: Kristina Melnichenko Democratic Party PCO 214  
Address: 12303 Harbour Pt. Blvd Mukilteo resident 20 yrs -  
Mukilteo WA 98275  
Phone or Email: Kmelnichenko97@gmail.com

## Social + Cultural

Please provide comments in the area below. (See back or attach additional sheets if necessary):

Mukilteo is a town that respects its natural resources - people ~~don't~~ pay to live here because of the natural beauty. This beauty is more valuable than the 30-50 jobs or tax brought in. Mukilteo does not have bikini baristas or a large commuter crowd. We are a small coastal town and people have bought + built homes based on that. We are not Seattle. There is more to our town than jobs.

## Environment

Your analysis only goes through 2024 while the carriers say they expect to see increased plane size starting from 2020. It is not logical or scientifically sound to claim no impact on our coastal environment. The added emissions, being so close to the (new) Arctic drilling and the noise and vibration impacting sea life on addition, it is irresponsible to claim no impact on coastal enviro- but especially sneaking to limit to before plane size increase. Even if these are only domestic flights for now, the emissions and noise will certainly impact surrounding

The comment period ends on November 2, 2018. Comments may be submitted at the Public Information Workshop or to the following addresses:

EMAIL: [PaineField@esassoc.com](mailto:PaineField@esassoc.com)

MAIL: ENVIRONMENTAL SCIENCE ASSOCIATES  
PAINE FIELD SUPPLEMENTAL EA  
5309 SHILSHOLE AVE NW, SUITE 200  
SEATTLE, WA 98107

→ TAXES?? B+D paid in full?

Wildlife and ecosystem.

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## Response to Comment

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Dear Kristina Melnichenko:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### **General Responses**

- 3-6: What Are the Existing and Future Noise Impacts?
  - 4-1: Sources of Existing Air Pollution
  - 6-1: What are the Quality of Life Impacts?
  - 6-5: What is the Impact on Wildlife?
  - 6-7: Effect on Culture of Local Community
  - 6-8: Cumulative Impacts
- 
-

# Comment Form

**Snohomish County Airport/Paine Field  
Draft Supplemental Environmental Assessment  
Public Information Workshop  
Monday, October 29, 2018**

Name: Kelly Papageorge  
Address: 3514 102nd Pl SE  
Everett, WA 98208  
Phone or Email: kelly@papageorge.net

Please provide comments in the area below. (See back or attach additional sheets if necessary):

I am an avid supporter of the ease and opportunity that this airport is commercial flights are going to offer.

The comment period ends on November 2, 2018. Comments may be submitted at the Public Information Workshop or to the following addresses:

EMAIL: [PaineField@esassoc.com](mailto:PaineField@esassoc.com)

MAIL: ENVIRONMENTAL SCIENCE ASSOCIATES  
PAINE FIELD SUPPLEMENTAL EA  
5309 SHILSHOLE AVE NW, SUITE 200  
SEATTLE, WA 98107

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## **Response to Comment**

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Dear Kelly Papageorge:

Thank you for your comments regarding the Proposed Action at Paine Field.

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I deliberately moved to Mukilteo (near PAE) in 1983 and went to work for Boeing in Everett as an Aeronautical Engineer. One of the jobs I had while working at Boeing was as a Noise Staff Engineer. I earned my pilots license at PAE. We raised our son and daughter in Mukilteo.

We've lived in Mukilteo for the past 35 years, the last 14 of which have been in Old Town near the Mukilteo Ferry. Only in the past couple of years have we experienced noise from "nighttime" (10pm-7am) Dreamlifter flights that not only abruptly wake us while sleeping, but as my wife Dana describes, literally "shakes us awake".

Our bedroom is on the 2<sup>nd</sup> floor of our home with the window facing North which is the approach for PAE runway 16R. Measured nighttime ambient noise levels at our home are 30-32dBA and measured noise levels at our home for Dreamlifter arrivals are typically 70-75dBA and departures are 75-80dBA (unless they turn out early in which case they are significantly higher earning the "shakes us awake" title.)

Based on our current experience with the nighttime Dreamlifter flights that occur on average once every 3 days (Flight Aware data, Feb 2018-Sep 2018, attached), we fear the projected 4.5 scheduled CAS nighttime flights will force us to move. We're already contemplating needing to move due to the Dreamlifter flights but are hopeful Boeing will help curtail its evening Dreamlifter flights.

At a recent Paine Field Community Council meeting, airport staff told us the scheduled CAS flights would start as early as 5am and run as late as midnight. That only leaves us a 5 hour block for sleep and combined with the random nature of the nighttime Dreamlifter flights we'll be forced to move. Granted, the nighttime Dreamlifter flights tend to come in bursts. For example, just this past Saturday early morning, there were Dreamlifter flights (two arrivals and two departures) at 1:12am, 3:31am, 4:54am and 6:57am.

The 1990 ANCA (Airport Noise and Capacity Act) prevents local jurisdictions from imposing nighttime curfews on aircraft flights. However, it also has provisions that allow voluntary curfews to be imposed. I believe this option should be spelled out in the EA to encourage the aircraft operators and our elected officials to work together to mitigate the adverse noise impacts that some of us are already experiencing.

Unresolved questions:

- Why doesn't the EA mention that local jurisdictions can work with aircraft operators to implement voluntary curfews to mitigate the adverse impact nighttime flights can have on the community?
- Did the EA include the recent increase of nighttime Dreamlifter flights that are currently impacting our ability to get a reasonable night's sleep on a consistent basis?

- Why doesn't the airport and elected officials make a visible effort to discourage nighttime flights that have such a detrimental impact on some of us?
- What options or help is available to noise proof our home or assist us in moving?

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## Response to Comment

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Dear Kevin Stoltz:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### **General Responses**

2-1: Why Can't the County Limit or Restrict Operations?

3-1: Existing Aircraft Noise Concerns

3-9: Request for Noise Curfew/Activity Restrictions

6-8: Cumulative Impacts

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# Comment Form

## Snohomish County Airport/Paine Field Draft Supplemental Environmental Assessment Public Information Workshop

Monday, October 29, 2018

Name: KIMBERLY VERGERONT  
 Address: 2125 W. MUKILTEO BLVD.  
EVERETT, WA 98203  
 Phone or  
 Email: KIDERNOSIUS@COMCAST.NET

Please provide comments in the area below. (See back or attach additional sheets if necessary):

1) MUCH OF THE UNDERLYING DATA IS MISSING, WHERE CAN ALL DATA USED BE FOUND?  
~~AND~~ FOR INSTANCE, IT'S REPORTED THAT SOLID WASTE WILL HAVE NEGLIGIBLE  
 IMPACT TO THE LOCAL TRANSFER STATION, BUT NO DATA ON THE  
 PROJECTED AMOUNT IS GIVEN.

- THIS IS A QUESTION FOR ALL DATA, NOT JUST FOR SOLID  
 WASTE.

2) WHERE IS THE ANALYTICAL PROCEDURES TO SHOW HOW DECISIONS  
 ARE MADE.  
 THROUGHOUT THE REPORT, THERE ARE MANY INSTANCES WHERE  
 A CONCLUSION IS GIVEN WITHOUT AN ANALYTICAL RATIONALE  
 TO BACK IT UP.

The comment period ends on November 2, 2018. Comments may be submitted at the  
 Public Information Workshop or to the following addresses:

EMAIL: [PaineField@esassoc.com](mailto:PaineField@esassoc.com)

MAIL: ENVIRONMENTAL SCIENCE ASSOCIATES  
 PAINE FIELD SUPPLEMENTAL EA  
 5309 SHILSHOLE AVE NW, SUITE 200  
 SEATTLE, WA 98107

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## Response to Comment

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Dear Kimberly Vergerony:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### **General Responses**

1-3: Flawed/Inadequate Supplemental EA  
1-5: Additional Study Should Be Conducted

Please also see the following individual response.

### **Solid Waste**

As stated in the Draft Supplemental EA, "The increase in solid waste is expected to be minimal and is not anticipated to exceed the capacity of the Airport Road Recycling & Transfer Station." Given the expected level of solid waste generation, a more detailed quantitative analysis is not warranted.

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# Comment Form

**Snohomish County Airport/Paine Field  
Draft Supplemental Environmental Assessment  
Public Information Workshop  
Monday, October 29, 2018**

Name: Lori Homes

Address: 3730 Serene Way Lynnwood WA 98087

Phone or

Email: lori@serenecounseling.com

Please provide comments in the area below. (See back or attach additional sheets if necessary):

My concern is for night-time flights and noise.  
My home is under the flight path south of the airport.  
I am awakened by jets flying over my house at night.  
Average <sup>65 DNL/dBc</sup> ~~65~~ doesn't address the level of noise for  
a discreet event which can disturb residential  
areas at night-time

I don't see sufficient traffic mitigation plans as  
there is already heavy traffic in the area  
due to ferry traffic, Boeing employees and  
residential and business traffic

EA should analyze possible fuel jettison and  
impact on the local environment

We need to see an EIS

The comment period ends on November 2, 2018. Comments may be submitted at the  
Public Information Workshop or to the following addresses:

EMAIL: [PaineField@esassoc.com](mailto:PaineField@esassoc.com)

MAIL: ENVIRONMENTAL SCIENCE ASSOCIATES  
PAINE FIELD SUPPLEMENTAL EA  
5309 SHILSHOLE AVE NW, SUITE 200  
SEATTLE, WA 98107

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## Response to Comment

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Dear Lori Homes:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### **General Responses**

- 1-5: Additional Study Should Be Conducted
  - 2-5: Would there be an Increase in Fuel Dump/Fuel Smell/Residue?
  - 3-1: Existing Aircraft Noise Concerns
  - 3-2: Use of the DNL Metric
  - 5-1: Existing and Future Traffic
  - 5-2: Traffic Analysis
  - 6-11: Mitigation
- 
-

10-29-18

**Comments on Draft EA for Paine field**

1. The defined study area is a rectangular box that does not represent the geography and drainage basins that take pollutants from the airport site to puget sound.
2. Noise levels of 65dB are contained within the airport property yet for residents living outside the airport noise levels are unbearable. How can the 65dB limit be realistic? What noise frequency is used in the rating
3. Homes directly in the flight path such as along 5th ave Mukilteo old town are not included in the study area and have not been included in the public notification process for changes taking place at the airport.
4. Noise from several aircraft such as the dream lifter as well as historic aircraft are unbearable outside the study area .
5. The EA assumes no construction will take place yet a new terminal will be created and reports of large areas being paved for additional parking are not included in the draft EA. Runoff from these sites will most likely affect the drainage basins leading to Puget Sound from the airport.
6. Public Notification for this EA is poor for local residents who are directly affected. Nothing was sent in the mail. We only learned about this by happening to watch local news.

Les Nelson and MaryJane Cavanagh  
1565 Mukilteo Lane  
Mukilteo WA 98275

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## **Response to Comment**

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Dear Les Nelson and Mary Jane Cavanagh:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### **General Responses**

- 1-4: Adequacy of Public Involvement and Public Hearing
  - 1-7: Study Areas
  - 3-1: Existing Aircraft Noise Concerns
  - 3-4: Noise Analysis Methodology
  - 3-10: Boeing 747 Dreamlifter Operations
  - 6-9: Water Quality Impacts
- 
-

# Comment Form

Snohomish County Airport/Paine Field  
 Draft Supplemental Environmental Assessment  
 Public Information Workshop  
 Monday, October 29, 2018

Name: Laurice White  
 Address: 11029 32<sup>nd</sup> Dr SE  
Everett WA 98208  
 Phone or Email: 425 750 8876

Please provide comments in the area below. (See back or attach additional sheets if necessary):

- 1) Why is there no noise abatement law?  
 - there should be no flights after 10 and before 6:00 am
- 2) How does Munkitka mitigate if there is no method or plan to measure noise? Why is noise not measured
- 3) What will be done w/ all the additional traffic
- 4) What will be done to address crime? Add'l police?
- 5) Will aircraft be required to be above or at 2000 ft. at take off?

The comment period ends on November 2, 2018. Comments may be submitted at the Public Information Workshop or to the following addresses:

EMAIL: [PaineField@esassoc.com](mailto:PaineField@esassoc.com)

MAIL: ENVIRONMENTAL SCIENCE ASSOCIATES  
 PAINE FIELD SUPPLEMENTAL EA  
 5309 SHILSHOLE AVE NW, SUITE 200  
 SEATTLE, WA 98107

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## Response to Comment

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Dear Laurice Whited:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### **General Responses**

2-4: Aircraft Currently Fly Low and Very Close to Houses

3-3: Noise Measurements and Supplemental Metrics Requested

3-9: Request for Noise Curfew/Activity Restrictions

6-3: What is the Impact of the Proposed Action On Crime?

6-11: Mitigation

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# Comment Form

**Snohomish County Airport/Paine Field  
Draft Supplemental Environmental Assessment  
Public Information Workshop  
Monday, October 29, 2018**

Name: Mike MURDOCK  
Address: 17124 69<sup>th</sup> PL. W.  
EDMONDS, WA 98026  
Phone or Email: MIKMUR@ICLOUD.COM 425-743-7964

Please provide comments in the area below. (See back or attach additional sheets if necessary):

EDMONDS AND SOUTH COUNTY ALREADY HAS A HUGE IMPACT WITH NOISE DUE TO OVERFLOW JET TRAFFIC FROM SEATAC LINING UP TO LAND. SOMETIMES EVEN AFTER 11:00 PM. BOEING TEST JETS FLY LOW OVER OUR HOME AT TIMES WITH NO RHYME OR REASON TO TIMES AND FLIGHT PATTERNS. PAINE FIELD WILL ADD EVEN MORE NOISE TO PROBLEM. HOW WILL THIS ISSUE BE RESOLVED?

WILL THE AIRPORT AND FLIGHTS CEASE AT ~~10~~ 10:00 PM?

SEATAC FLIGHTS NOW LAND FROM THE NORTH WHEN WIND BLOWS FROM THE SOUTH. EDMONDS AND SOUTH COUNTY IS ALREADY BURDENED WITH SEATAC FLIGHTS. HOW WILL PAINE FLIGHTS BE ROUTED?

HOW WHAT WILL THE NORMAL TAKEOFF AND LANDING PATTERNS BE HANDLED AND ROUTED?

The comment period ends on November 2, 2018. Comments may be submitted at the Public Information Workshop or to the following addresses:

EMAIL: [PaineField@esassoc.com](mailto:PaineField@esassoc.com)

MAIL: ENVIRONMENTAL SCIENCE ASSOCIATES  
PAINE FIELD SUPPLEMENTAL EA  
5309 SHILSHOLE AVE NW, SUITE 200  
SEATTLE, WA 98107

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## Response to Comment

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Dear Mike Murdock:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### **General Responses**

2-4: Aircraft Currently Fly Low and Very Close to Houses

3-1: Existing Aircraft Noise Concerns

3-9: Request for Noise Curfew/Activity Restrictions

6-3: What is the Impact of the Proposed Action on Crime?

6-8: Cumulative Impacts

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# TABLES - INTERSECTION DEFLECTION

## Paine Field EA Update

### 5.9 Land Use and Zoning

Paine field is located in Snohomish County, and is adjacent to the Cities of Everett and Mukilteo. The 2012 EA discussed Snohomish County's 2025 Comprehensive Plan and future land use plan. Snohomish County has since updated their Plan and the Snohomish County 2035 Comprehensive Plan was reviewed for this Supplemental EA. The 2035 Plan classifies the future land use of Paine Field as Manufacturing Industrial Overlay. This updated plan also retains the designation of an Airport Influence Area (AIA), defined as the area within a specified distance of a public use airport that may experience impacts from airport operations (Snohomish County Code 30.91A.132), for public use airports in the County. Land Use Policies were established in the Comprehensive Plan to encourage compatible uses in the vicinity of the airport, notify surrounding properties of the proximity to public use airports, and discourage development adjacent to public use airports that may negatively impact airport operations.

1. Snohomish County Comprehensive Plan (Future Land Use Map): What does "Manufacturing Industrial Overlay" mean? (No definition?)
2. EA 6.13.1- Road intersections: What is the definition of "acceptable level of service" vs. "deficient level of service"?
  - a. Liked that report specified 7 deficient intersections that would be deficient even with no action alternative; but certainly the level of service for these intersections will not improve with additional airport traffic.
3. How did this study account for the waves of Boeing surface traffic? For Mukilteo ferry surface traffic?
4. For Mukilteo, how did this study forecast surface traffic diverted to side streets, e.g. 80<sup>th</sup> St. SW, 76<sup>th</sup> St. SW, and 44<sup>th</sup> Ave. W.? i.e. as traffic grows at nearby intersections, more vehicles taking short cuts up/down hills through neighborhoods (already have semis cutting through without additional airport traffic)
- \* 5. We keep hearing "no significant impacts."
  - a. Increase from 9-10 scheduled "departures" (2012) per day to 24 "round trip" flights per day (2018).
    - i. Apples/oranges. Please express in equivalent units. Were 20 round trip flights per day planned in 2012? (departures + arrivals) Are the 24 "round trip" flights now including arrivals at PAE? (presumably?)
  - b. Please give examples of what would constitute significant impacts for the following:
    - i. Aircraft noise
    - ii. Wetland & parks

J LANGUS  
ROBINETTE

30 YRS

TO ATTRACT/  
GROW AIRLINE  
SERVICE AT  
PAE

G BACHMAN

iii. Road traffic

6. EA Figure 5.6-1- Narbeck Wetland Sanctuary is not included as a Section 4(f)/6(f) property.

Why?

a. EA 5.15.1- Narbeck is mentioned as a wetland mitigation bank from the 2012 EA. How was Narbeck addressed in the 2018 update considering the significantly increased level of scheduled flight operations and its associated activities?

\* 7. EA 1.2.2- "...On January 31, 2013, a petition was filed in the United States Court of Appeals for the Ninth Circuit challenging the FONSI/ROD.6...The FAA argued that it did not view the possibility of unlimited commercial service at Paine Field as reasonably foreseeable. The FAA pointed to a number of constraints and physical limits at Paine Field that limit the number of commercial air service operations that can be accommodated at the airport including the size and capacity of the proposed modular passenger terminal...."

- a. Unlimited airline service is not foreseeable due to physical limits at PAE. Besides the size and capacity of the modular terminal building, what are those physical limits?
- b. The terminal is currently at capacity limits based on the proposed flight schedules by the 3 airlines. Given the previously stated physical limits at PAE, why do the airlines wish to operate here if they cannot grow?
- c. Why is the terminal building of modular design?
- d. "...During the litigation, funding sources for the terminal building changed, and neither Allegiant Air nor Horizon Air moved to initiate commercial air service at Paine Field." Can you provide additional details? How did the funding sources change? How/Why did that impact Allegiant and Horizon?

\* B. MOTION NO. 18-313 AUTHORIZING THE EXECUTIVE TO EXECUTE AN AMENDMENT TO LEASE WITH PROPELLER AIRPORTS PAINE FIELD, LLC AT THE SNOHOMISH COUNTY AIRPORT- "WHEREAS, Lease Amendment No. 1 provides an additional 192,963 square feet for vehicle parking to the existing leased premises of 457,656 square feet, totaling 650,619sf. Legal descriptions of leased areas will be revised...."

- a. That's a 42% increase in parking space. Why?
- b. How does this expansion NOT encroach on existing GA aircraft parking space? Particularly in proximity to the P4 parking lot?
- c. What measures will be taken to assure ease of parking and access for existing GA tenants and customers?
- d. Why is this change not addressed in the EA update?

QUESTIONS AND COMMENTS  
MIKE SHEA

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## Response to Comment

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Dear Mike Shea:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### **General Responses**

1-8: Significance of Project Impacts

1-9: How Is Significance Defined?

2-3: What Are the Effects of the Proposed Project on General Aviation?

5-2: Traffic Analysis

5-3: Ferry Operations

6-10: Wetland Impacts

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# Comment Form

## Snohomish County Airport/Paine Field Draft Supplemental Environmental Assessment Public Information Workshop

Monday, October 29, 2018

Name: Mary Stephens Bell

Address: 2919 203rd St SW  
Lynnwood WA 98036

Phone or Email: 425-299-7418 mary.sb@frontier.com

Please provide comments in the area below. (See back or attach additional sheets if necessary):

See attached sheet

The comment period ends on November 2, 2018. Comments may be submitted at the Public Information Workshop or to the following addresses:

EMAIL: [PaineField@esassoc.com](mailto:PaineField@esassoc.com)

MAIL: ENVIRONMENTAL SCIENCE ASSOCIATES  
PAINE FIELD SUPPLEMENTAL EA  
5309 SHILSHOLE AVE NW, SUITE 200  
SEATTLE, WA 98107

To: Paine Field Commercial Traffic Study Team

10-29-18

I moved to the Puget Sound area from Alaska in 1987. My in-laws were living in Burien, and we stayed with them for about 3 months while we searched for, and purchased, a house. During the first few weeks of staying with them, it became abundantly clear that the noise from SeaTac was overwhelmingly loud, and I vowed that we would not purchase a house anywhere near SeaTac. The jets came in and out starting at 6:00 am, until about midnight. They were so loud, they rattled the windows, woke up my children, you could not hear the TV, and you could not carry on a conversation when outdoors. And be aware, these jets were not flying overhead, but you could see them in the distance as they landed and took off from the airport. This was before the third runway was built, and there were swaths of empty houses that had been seized via eminent domain, for the future runway. My brother-in-law lives in Des Moines, and after the third runway was built, the SeaTac Authority installed triple pane windows in this house due to the extreme noise.

All that being said, we bought in Lynnwood. At that time, we actually inquired about the possibility of commercial air traffic coming and going from Paine Field, and were assured it would likely never happen. Through the years, there has been increasing jet traffic at Paine Field, for the delivery and test flying of new jets out of Boeing, and other jets coming in for repairs and bringing in parts and supplies. The air traffic is sporadic, not scheduled, and is for the most part, acceptable. Sometimes, however, the jets are extremely low over my house, and are amazingly loud. I can look up and see the enormity of the plane, all the details on the plane, and I can physically feel the roar of the engines.

It is shocking to me to think that this could be happening dozens of times a day. In fact, it would likely cause me to put my house up for sale and leave the area. I might as well have bought a house in Burien in 1987, where houses were very cheap BECAUSE OF THE LOUD JET NOISE. So guess what? Now the value of my house in Lynnwood will be horribly impacted, the equity I have built in my home will drop, and I will never enjoy the benefits of the investment I have made in my home in Lynnwood. In case I have not made it clear: I strongly oppose the approval of regularly scheduled commercial jet traffic in and out of Paine Field.

Mary Stephens-Bell

2919 203<sup>rd</sup> St SW

Lynnwood 98036

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## Response to Comment

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Dear Mary Stephens-Bell:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### **General Responses**

2-4: Aircraft Currently Fly Low and Very Close to Houses

3-1: Existing Aircraft Noise Concerns

6-2: What is the Impact on Property Values?

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# Comment Form

**Snohomish County Airport/Paine Field  
Draft Supplemental Environmental Assessment  
Public Information Workshop  
Monday, October 29, 2018**

**Name:** Monica Weisbart  
**Address:** 5620 200<sup>th</sup> St SW Apt A-104  
Lynnwood, WA 98036  
**Phone or**  
**Email:** monicaweisbart@yahoo.com

**Please provide comments in the area below. (See back or attach additional sheets if necessary):**

has any other sites NE of Seattle  
been considered??

The comment period ends on November 2, 2018. Comments may be submitted at the Public Information Workshop or to the following addresses:

**EMAIL:** [PaineField@esassoc.com](mailto:PaineField@esassoc.com)

**MAIL:** ENVIRONMENTAL SCIENCE ASSOCIATES  
PAINE FIELD SUPPLEMENTAL EA  
5309 SHILSHOLE AVE NW, SUITE 200  
SEATTLE, WA 98107

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## Response to Comment

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Dear Monica Weisbart:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general response that applies to your comments.

### **General Response**

1-10: Consideration of Other Airports

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# Comment Form

**Snohomish County Airport/Paine Field  
Draft Supplemental Environmental Assessment  
Public Information Workshop  
Monday, October 29, 2018**

Name: Nathan Raring  
 Address: 3501 222 Pl. SW  
Brier, WA 98036  
 Phone or Email: lisarate@frontier.com

Please provide comments in the area below. (See back or attach additional sheets if necessary):

The use of average db does not is not a logical choice in assessing quality of life impacts to the community. A jet landing takes ~~about~~ <sup>about</sup> 1 minute to pass my house. That means the the loud noise will be only 24 min / day leaving 23 hrs 36 min of no jet noise, to counter the jet noise for the average. That doesn't help it I'm awoken an hour or 2 early due to a jet and then during the day I have to stop conversation twice an hour to let a jet go by.

For perspective I live 600 miles south of the runway and directly in line with it. When one lands its very loud and very disrupting.

Avg- db is typically used when assessing ~~noise~~ noise level safety (ie hearing damage) which makes sense

The comment period ends on November 2, 2018. Comments may be submitted at the Public Information Workshop or to the following addresses:

EMAIL: [PaineField@esassoc.com](mailto:PaineField@esassoc.com)

MAIL: ENVIRONMENTAL SCIENCE ASSOCIATES  
 PAINE FIELD SUPPLEMENTAL EA  
 5309 SHILSHOLE AVE NW, SUITE 200  
 SEATTLE, WA 98107

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## Response to Comment

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Dear Nathan Raring:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### **General Responses**

3-2: Use of the DNL Metric

3-4: Noise Analysis Methodology

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Hello to everyone here tonight. Thank you for taking my comments

My name is Polagaya McLaughlin and I am President of Local 109 of the American Federation of State County & Municipal Employees. <sup>I am here speaking on behalf of</sup> One of the groups I represent is the Maintenance Workers <sup>at</sup> at the Paine Field Airport. Along with other work, these union workers are the ones responsible for keeping the runway painted, clear of debris, ~~painter~~, and in good order, cleaning snow, placing deicer, and seeing that the runway lights are in proper operating order.

*We* I am speaking to the socio economic aspect of the EIS ~~I come with two grave safety concerns.~~ <sup>in that it concerns the safety of workers at the Airport</sup> ~~We believe have not been addressed~~ <sup>with the addition of more service.</sup>

First, it is my understanding that the Tower will not be staffed 24 x 7. Yet the Airport remains a general service airport. Besides commercial service, small planes ~~can~~ use the runway and Boeing <sup>uses the Airport to bring in large</sup> planes for repair and maintenance and for test flights. The runway needs to be swept and most sweeping will take place when the runway is quiet. The <sup>work</sup> work window is very narrow and it will not be at night, when the Tower is closed. Planes are allowed to land at that time of day without an okay from a Tower and without <sup>an</sup> announcement. Our workers have radios and they monitor for landing announcements. They have already had several near misses <sup>when</sup> when working on the runway and an approaching plane <sup>did not</sup> did not announce they were coming in. At night workers cannot even see the planes approaching so that they <sup>are</sup> are off the runway. We believe this is an accident waiting to happen and it endangers not only our workers but the occupants of the plane, as well.

Second, an increase in plane traffic ~~will mean~~ an increase in debris on the runway. At the same time increased plane traffic narrows the window in which our workers can be on the runway to clear debris. Debris left on the runway can be expensive when <sup>it</sup> ~~is~~ damaged a plane. <sup>They</sup> It can also be deadly. We greatly fear <sup>that</sup> the current staffing plans do not cover the additional workload <sup>under nighttime conditions.</sup> ~~under nighttime conditions.~~ <sup>to adequately keep</sup>

<sup>We</sup> ~~ask you to see~~ that both these safety concerns <sup>are</sup> are addressed before moving forward with <sup>plans for</sup> additional flights. <sup>The runways safe.</sup> <sup>be</sup>

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## Response to Comment

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Dear Polagaya McLaughlin:

Thank you for your comments regarding the Proposed Action at Paine Field.  
Please see the following general response that applies to your comments.

### **General Response**

6-6: What are the Safety Impacts due to the Air Traffic Control Tower Hours?

Please also see the following individual response.

### **Foreign Object Debris**

Foreign Object Debris (FOD) control on the runway is expected only when the tower is occupied, which is the current protocol; if there is a necessity to remove FOD when the tower is not staffed, Common Traffic Advisory Frequency (CTAF) procedures are and would be employed (see General Response 6-6).

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# Comment Form

## Snohomish County Airport/Paine Field Draft Supplemental Environmental Assessment Public Information Workshop

Monday, October 29, 2018

Name: Robert Edwards

Address: 23030 76th Ave W #12  
Edmonds WA 98026

Phone or Email: 206 226 5777

Please provide comments in the area below. (See back or attach additional sheets if necessary):

I am in favor of commercial air service from  
Paine Field. This will reduce the overall miles driven  
by reducing the long, slow commute through Seattle.  
This will reduce CO2 emissions.

The comment period ends on November 2, 2018. Comments may be submitted at the Public Information Workshop or to the following addresses:

EMAIL: [PaineField@esassoc.com](mailto:PaineField@esassoc.com)

MAIL: ENVIRONMENTAL SCIENCE ASSOCIATES  
PAINE FIELD SUPPLEMENTAL EA  
5309 SHILSHOLE AVE NW, SUITE 200  
SEATTLE, WA 98107

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## **Response to Comment**

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Dear Robert Edwards:

Thank you for your comments regarding the Proposed Action at Paine Field.

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# Comment Form

**Snohomish County Airport/Paine Field  
Draft Supplemental Environmental Assessment  
Public Information Workshop  
Monday, October 29, 2018**

Name: Rick + Sandy Phillips

Address: 4116 189th Pl SW Lynnwood WA 98036

Phone or Email: mumsee8@hotmail.com

Please provide comments in the area below. (See back or attach additional sheets if necessary):

We are in support of having a  
at  
Snohomish County Airport/Paine Field. We think  
it would be good for the area economy, we  
think  
hope it will reduce traffic to Seattle and it  
will be alot easier for us to use, rather than  
Sea-tac. We are excited for it to happen.

The comment period ends on November 2, 2018. Comments may be submitted at the Public Information Workshop or to the following addresses:

EMAIL: [PaineField@esassoc.com](mailto:PaineField@esassoc.com)

MAIL: ENVIRONMENTAL SCIENCE ASSOCIATES  
PAINE FIELD SUPPLEMENTAL EA  
5309 SHILSHOLE AVE NW, SUITE 200  
SEATTLE, WA 98107

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## **Response to Comment**

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Dear Rick and Sandy Phillips:

Thank you for your comments regarding the Proposed Action at Paine Field.

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Environmental Science Associates  
Paine Field Supplemental EA  
5309 Shilshole AVE N.W. Suite 200  
Seattle WA. 98107

To all involved, please take the time to address all the concerns from the neighboring communities regarding the Paine Field expansion. There will be greater impacts on health, noise, lifestyle and property values that do not appear to be reflected in the testing that was performed.

I used to live in the flight path of the SeaTac airport at 264<sup>th</sup> pl in Des Moines, WA. I do remember how opposed people were about the third runway and all complaints against it fell on deaf ears. I sure hope this will not be the case with this expansion. I have several issues with the process up to date and would like some explanation as to how these findings came to be.

My first issue is with the overall notification. I have spoken with neighbors who had no idea this was going to happen. Maybe they do not watch the news, but the way news goes these days I can't say I blame them. There should have been mailers go out to affected properties. Something of this magnitude must be made known, especially to the residents that believed there would be no expansion of the airport by means of the "Mediated Role Determination".

But then that brings me to my second complaint. How was the community north of the runway not included in your survey/study area?! The line was drawn just before the properties in my neighborhood. The planes do not suddenly stop making noise, pollution, or danger risk to people beyond this line. I believe this was a flawed test and should be re-done with the affected area going all the way to the water. The SeaTac noise abatement boundaries went from the airport (188<sup>th</sup> st) to Federal Way (so.272<sup>nd</sup> ST) which is 84 blocks. I would expect that Paine field should use that distance as a starting point.

My third concern is how the test and percent increase in flights may not be reflective of the actual increase in like-sized aircraft. The increase of 17,520 flights per year is a 16% increase of the normal total number of flights of 106,852. However, the real impact is the tripling of the air carrier flights that are at 4,589 per year before expansion. Once again it seems there could have been better data to reflect the real-world impact. I just do not see why, if there is any concern about the neighboring communities, why there was not a real-world test conducted by running actual flights for 48 hours that would simulate the total effect on our community, including the night time annoyance of these flights. If this test were run, the time weighted average of the current noise level could be compared to the proposed actual time weighted average in different zones of the affected areas. Then there could have been a more accurate comprehensive test and results.

Lastly but not the least is my concern for the added safety risks of more flights over populated areas, especially ones that have been left out of a risk assessment analysis. This oversight is unacceptable and should be demanded to be re-evaluated and further tests must be performed for public safety and risk assurance. Not to mention every affected household must be notified of when the testing will take place and what the results are.

In conclusion, the residents in all the neighborhoods are due explanations of not only what the test results are, but what is the intent of the airport for the near future as well as the distant future. Is this just the beginning of what could be a long chiseling of our way of life in these neighborhoods from at one time promising no commercial flights to running 24, 48, 64, etc. commercial flights a day or night?! What legal action will the neighbors have once this is enacted? Will there be settlements, abatement, or buyouts? Transparency and honesty will be a key operative to best relations with the neighbors of the airport.

Regards,



Rob Stahnke

404 Lamar dr.

Mukilteo, WA. 98275

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## Response to Comment

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Dear Rob Stahnke:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### **General Responses**

- 1-4: Adequacy of Public Involvement and Public Hearing
  - 1-7: Study Areas
  - 2-2: Mediated Role Determination (MRD) Document
  - 3-3: Noise Measurements and Supplemental Metrics Requested
  - 3-4: Noise Analysis Methodology
  - 3-6: What Are the Existing and Future Noise Impacts?
  - 6-2: What is the Impact on Property Values?
  - 6-4: What are the Health Effects Associated with the Proposed Action?
- 
-

# Comment Form

**Snohomish County Airport/Paine Field  
Draft Supplemental Environmental Assessment  
Public Information Workshop  
Monday, October 29, 2018**

Name: S Swann  
 Address: 12512 54<sup>th</sup> ave W  
Mukiteo WA  
 Phone or  
 Email: \_\_\_\_\_

Please provide comments in the area below. (See back or attach additional sheets if necessary):

majority of folks in mukiteo, Edmonds, Lynnwood  
 are opposed to Paine Field becoming a  
 regional "passenger" Airport

The original "MRP" stated that there  
 was no intent of this happening

Typical Bureaucrats making decisions  
 outside of what the general public  
 want.

Traffic will be a nightmare

The comment period ends on November 2, 2018. Comments may be submitted at the  
 Public Information Workshop or to the following addresses:

EMAIL: [PaineField@esassoc.com](mailto:PaineField@esassoc.com)

MAIL: ENVIRONMENTAL SCIENCE ASSOCIATES  
 PAINE FIELD SUPPLEMENTAL EA  
 5309 SHILSHOLE AVE NW, SUITE 200  
 SEATTLE, WA 98107

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## Response to Comment

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Dear S. Swann:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### **General Responses**

1-6: Draft Supplemental EA Did Not Reflect the Opposition of the Community

2-2: Mediated Role Determination (MRD) Document

5-2: Traffic Analysis

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I testified at the original FAA hearing when the proposal was to allow 12 commercial flights per day at Paine Field. I signed up to hopefully receive notices of any future meetings or decisions. I heard nothing. I received no notifications. For that reason I come here tonight with great skepticism for this meeting. We no longer are talking about 12 flights a day. Now the number we are told is 24. What that really means is 24 flights in and 24 flights out, a total of 48 overflights each day. I moved to Lynnwood 50 years ago. At that time we were given assurances that Paine Field would be a General Aviation airport. Those assurances were violated by the FAA and the County Council in response to business interests who would not be affected by noise and pollution of Commercialization of Paine. Most of them live north or east of the airport. We live directly in the path of the field. We are directly impacted by the increase of the size, noise and pollution this will bring to our neighborhood.

I have no doubt that my appearance here tonight will have NO impact on your decision. It is to me obvious that this is a done deal and this meeting tonight is only to allow you to say “we reached out to the community. We have done our due diligence.” You may consider me naïve or stupid in light of the past promises made about Paine Field, but I want to ask you if you are willing and able to assure us that the number of flights will be limited to 24 per day for now and for all time. Perhaps I am cynical, but I fully expect Propeller and the airlines to discover that more flights will be necessary in the near future and that the number of gates will be increased to 4 and the number of flights in and out increased to 96. And that the future of Paine will be SeaTac 2.0. By that I assume the runway limitations at Paine will never match SeaTac but the expansion of flights will, in the future, lead to hundreds of flights being added and the impacts to our neighborhoods will affect the livability and value of our homes. As I testified at the original hearing, there is still no mitigation in this plan for noise impacts. There are a dozen or more schools in the flight path and their situation should be addressed before this plan is approved. Finally, give us your assurance that the number of flights will be limited for now and for all time to 24 per day. Without that assurance it is clear you are condemning us to the same fate that residents around SeaTac face. It is clear that our voices carry no weight with the FAA or the County and our fate is sealed. What is your assurance, what is your promise to us tonight. Honesty counts.

Ted Hikel, 3820 191<sup>st</sup> Place S.W., Lynnwood, WA 98036, Phone 425-778-6342

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## Response to Comment

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Dear Ted Hikel:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### **General Responses**

1-2: Scope of the Supplemental EA Analysis for Future Operations and Passengers

1-4: Adequacy of Public Involvement and Public Hearing

1-6: Draft Supplemental EA Did Not Reflect the Opposition of the Community

1-10: Consideration of Other Airports

3-6: What Are the Existing and Future Noise Impacts?

3-7: Noise Impacts on Schools

6-11: Mitigation

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## Response to Comment

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Dear Tricia Monaghan:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### **General Responses**

- 1-2: Scope of the Supplemental EA Analysis for Future Operations and Passengers
  - 1-5: Additional Study Should Be Conducted
  - 1-7: Study Areas
  - 2-5: Would there be an Increase in Fuel Dump/Fuel Smell/Residue?
  - 3-1: Existing Aircraft Noise Concerns
  - 3-5: Where are Flight Tracks Shown?
  - 3-8: What are the Health Effects of Noise?
  - 6-10: Wetland Impacts
- 
-

10/28/18

P79

To the FAA:

I was so surprised to see that our neighborhood just north of the main runway was completely left out of the Generalized Study Area (see attached photo). The jets fly very low over us and I assume we'll have virtually all the takeoffs or landings from the new commercial flights going right over us. Typically we only have a handful of jets flying over per day, perhaps an average of 6, and some Sundays we only hear one. Obviously, 24 more daily flights going right over us is a very significant increase (likely we will get one direction for each flight).

On table 3-4 you can see that the Air Carrier flights in 2019 are expected to average 12.57 per day (annual total of 4,589/365, either direction counted as one flight); obviously the addition of 48 (24 flights, each way) more jet flights per day is NOT insignificant. It's not appropriate to compare the increase of 48 to the full number of flights at Paine Field as the GA propeller flights aren't nearly as noisy. Of course there'll be a huge impact from the tripling of jet flights over our neighborhood from noise, pollution and safety aspects.

The average jet passing over the neighborhood directly north of the runway appears to be 85 decibels. Thus the noise level is not insignificant for us, and many single-family residences will be significantly impacted. Given that the # of jets will nearly triple, it is possible that we will have an average decibel level increase of 1.5 or more (the studies indicate that as a threshold for significant DNL impact).

Please expand the Generalized Study Area to include all neighborhoods under the flight patterns of the commercial jets within Mukilteo and Everett city limits. You're making a serious omission by not including the single-family homes significantly impacted by commercial flights.

This significant increase in jet flights directly over us does indeed bring up safety concerns, so I'm asking the FAA to please consider the increased risk for the many families directly under the flight patterns.

I realize that you will surely want to simply classify us as "NIMBY's", but I'm trying to remain hopeful that you will also keep the "golden rule" in mind. How would YOU like to be treated if YOU had happened to buy the best house you could afford in the safe, cute town of Mukilteo, many years ago. And YOU figured there'd never be commercial flights allowed over so many homes, you knew there was an agreement not to, and you got used to a few jets going over head. But now YOU are faced with 24 additional flights thundering over per day, every day, even in the middle of the night? How would YOU prefer to be treated if you happen to live in one of our houses?

You'd probably ask for at least some restrictions to be placed on the airlines and Propeller:

- Increase the noise restriction levels for the commercial flights. I've heard from a Boeing friend that Stage 4 or higher would be best.
- The size of the commercial jets should be limited as much as possible, preferably to the 737 Max and the A320Neo since they are the quietest airplanes currently available.
- Limit hours to 7am to 10 pm. Other community airports have restricted hours.
- Enforce the Stage 2 noise levels for propeller planes

Please pass along all of this feedback to the FAA.

Thank you for your time-

*Valerie A. Shugart*  
404 Loman Drive,  
Mukilteo WA 98275

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## Response to Comment

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Dear Vallew Thuyen:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### General Responses

1-7: Study Areas  
1-8: Significance of Project Impacts  
1-9: How is Significance Defined?  
2-4: Aircraft Currently Fly Low and Very Close to Houses  
3-2: Use of the DNL Metric  
3-9: Request for Noise Curfew/Activity Restrictions  
6-11: Mitigation

Please also see the following individual response.

### Stage 2 Aircraft

Passage of the Airport Noise and Capacity Act of 1990 (ANCA) prohibited operation of Stage 1 and Stage 2 jet aircraft with a maximum weight above 75,000 pounds within the United States after December 31, 1999. In addition, the FAA Modernization and Reform Act of 2012 (FMRA) prohibits operation of Stage 1 and Stage 2 jet aircraft with a maximum weight of 75,000 pounds or lower within the 48 contiguous United States after December 31, 2015.

As a result of ANCA, no new noise and/or access restrictions at airports can be implemented without a thorough demonstration of the need for the restriction, a detailed analysis of the restriction and its consequences, a demonstration that the benefits of the restriction outweigh its costs, evidence that all other nonrestrictive measures have been exhausted, input from the affected aircraft operators regarding the restriction, and approval of the restriction by the FAA. Given that all of the DNL 65 contours for Paine Field's existing and future aircraft operations with and without the Proposed Project contain no non-compatible land uses, there is no basis to restrict aircraft from operating at PAE.

There are very few Stage 2 propeller aircraft that operate at Paine Field; approximately five round-trip flights a day are by Stage 2 propeller aircraft such as the Cessna 182. Operation of these aircraft is consistent with all applicable federal laws. Therefore, there is no legal method of restricting these operations as there would be no way to demonstrate a need consistent with ANCA when there are no noncompatible land uses within the DNL 65 dB contour to mitigate.

Additionally, the Airport has voluntary Noise Abatement Procedures for both small and large propeller aircraft, which are described in detail on Paine Field's website (<https://www.painefield.com/159/Noise-Abatement-Procedures>).

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# Comment Form

Snohomish County Airport/Paine Field  
Draft Supplemental Environmental Assessment  
Public Information Workshop  
Monday, October 29, 2018

Name: William R Gregerson  
Address: 13320 Beverly Park Road  
Mukilteo WA 98275  
Phone or  
Email: 425-745-1014

Please provide comments in the area below. (See back or attach additional sheets if necessary):

The intersection of 100th and Holly Drive has no signals for traffic flow. It is a four way stop with signs. There are three schools close by with children using this intersection. This intersection needs stop lights and traffic flow upgrades. Our children need protection at this intersection.

Empty lined area for additional comments.

The comment period ends on November 2, 2018. Comments may be submitted at the Public Information Workshop or to the following addresses:

EMAIL: [PaineField@esassoc.com](mailto:PaineField@esassoc.com)

MAIL: ENVIRONMENTAL SCIENCE ASSOCIATES  
PAINE FIELD SUPPLEMENTAL EA  
5309 SHILSHOLE AVE NW, SUITE 200  
SEATTLE, WA 98107

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## Response to Comment

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Dear William Gregerson:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### **General Responses**

5-2: Traffic Analysis

6-11: Mitigation

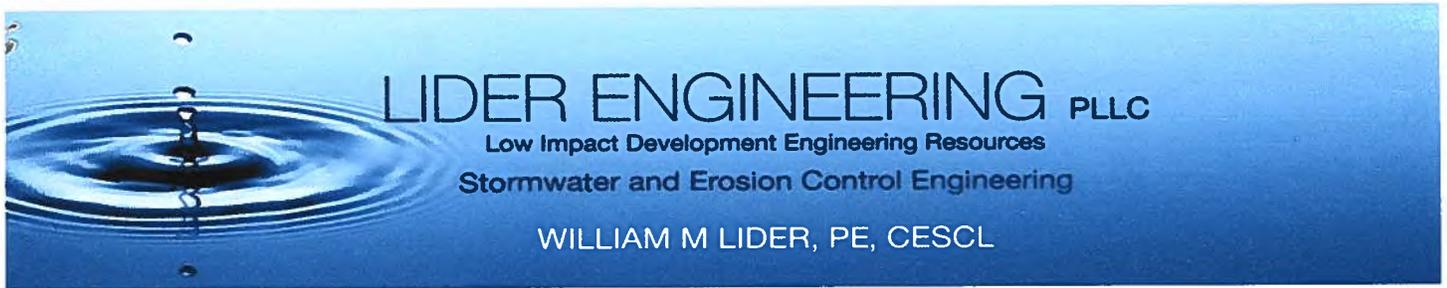
Please also see the following individual response.

### **Intersection of 100th Street SW and Holly Drive**

The intersection of 100th Street SW at Holly Drive is a City of Everett intersection. The City of Everett has a threshold of 50 peak-hour trips to determine which intersections are analyzed. The intersection of 100th Street SW at Holly Drive is not impacted with less than 50 peak-hour trips and was not identified during the scoping process with City of Everett staff. The intersection of 100th Street SW at Holly Drive was therefore not required to be analyzed as part of the traffic analysis. It is important to note that the City of Everett Transportation Element does identify improvements to 100th Street SW between Airport Road and 4th Avenue W, but does not identify specific improvements.

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October 29, 2018

**P81**

Environmental Science Associates  
5309 Shilshole Ave NW, Suite 200  
Seattle, WA 98107

Subject: Paine Field Draft Supplemental EA  
William Lider, PE Comments  
Submitted for the Sno-King Watershed Council

Your consideration is requested of the following comments on the subject Draft Supplemental Environmental Assessment submitted on behalf of the Sno-King Watershed Council:

1. Page 4-2, Section 4.2.2, Third Paragraph, First Sentence reads:

“There is no proposal to construct any new, or expand any existing, terminal buildings, concourses, aircraft parking aprons, or support buildings at Paine Field.”

Revise this sentence to read:

There is no proposal to construct any new or replaced hard surface, or expand any existing, terminal buildings, concourses, aircraft parking aprons, or support buildings at Paine Field under this Supplemental Environmental Assessment.

2. Page 5-13, Section 5.3.3, add a discussion on the use of Big Gulch Creek and Japanese Gulch Creek by threatened salmonid species, see Comment 3 below. Stormwater flow from Paine Field does not match the forested, predeveloped flow durations that can adversely impact threatened fish habitat in the creeks downstream from Paine Field.
3. Page 5-44, Section 5.15.4, second paragraph: The 2008 Paine Field Master Drainage Plan can no longer be used for addressing stormwater control and water quality treatment for Paine Field Airport. The 2008 Master Drainage Plan relies on the outdated and discredited Santa Barbara Urban Hydrograph (SBUH) single storm event methods. Stormwater flow control and water quality treatment must be designed using the most current edition of the Western Washington Hydraulic Model under the Snohomish County 2016 *Drainage Manual*, revised 2017.

This project and all future projects at Paine Field can no longer be vested under the Paine Field Airport's 2008 Master Drainage Plan, pursuant to the December 29, 2016 Washington State Supreme Court ruling *Snohomish County, et.al. v. Pollution Control Hearings Board, et.al* ruling.

4. Page 5-45, Section 5/15.5, last paragraph: Reference is made to using the:

"Washington State Department of Ecology 2012 Stormwater Management Manual for Western Washington, as amended in December 2014 (WDOE 2014)."

This is the incorrect stormwater manual is not allowed for use under Snohomish County's Phase I Municipal Stormwater Permit. All stormwater work must be designed using Snohomish County's 2016 *Drainage Manual*, revised 2017.

5. Page 6-5, Section 6.3.2, First paragraph states that:

"There are no known federally-listed species documented on the airport and no designated Critical Habitats within one mile. Approximately one mile to the west of Paine Field, Puget Sound contains Critical Habitat for federally-listed Chinook salmon, bull trout and Puget Sound Southern Resident killer whale."

Critical habitat exists in both Big Gulch Creek and Japanese Gulch Creek for federally listed, threatened Chinook salmon. Use of these streams by juvenile non-natal Chinook salmon has been documented in the report: *JUVENILE CHINOOK SALMON REARING IN SMALL NON-NATAL STREAMS DRAINING INTO THE WHIDBEY BASIN*, Beamer et.al. report dated December 3, 2013. This report has been presented as an exhibit at several past appeals of Paine Field projects by the Sno-King Watershed Council and copies of this report should be available through the Paine Field Planning Department.

Please revise the DSEA to note the presence and use of both Japanese Gulch and Big Gulch my threatened Chinook salmon and the need to protect this critical habitat.

6. Page 6-6, Section 6.3.2, last paragraph states:

"The Proposed Action would result in no new grading or increase in impervious surface at the Airport."

The foregoing sentence is poorly written. It is suggested that the sentence be re-written to read:

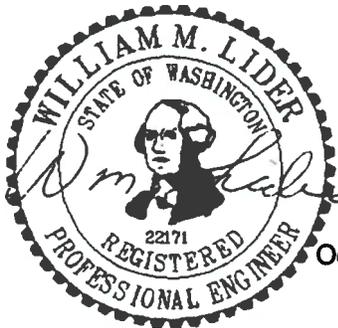
The Proposed Action ~~would~~ will result in no new grading or ~~increase in new or replaced hard~~ surface at the Airport.

This change is required because replaced hard (e.g. impervious) surface can require construction of flow control and water quality treatment. Please refer to SCC 30.91R.119 for the definition of what constitutes, "replaced hard surface".

7. Page 6-27, Section 6.15.2.4, First Paragraph, please revise the reference to Paine Field's obsolete 2008 Master Drainage Plan, per the previous comment on the Master Drainage Plan.
8. Page 6-28, Section 6.15.2.5, First Paragraph: Revise the last sentence to indicate that there will be no replaced hard surface as a result of this project, as defined under SCC 30.91R.119.

Thank you for your consideration and response to address the foregoing comments on the Draft Supplemental Environmental Assessment.

Respectfully submitted,  
LIDER ENGINEERING, PLLC



October 29, 2018

William Lider, PE, CESCL  
Principal Engineer

cc: Sno-King Watershed Board

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## Response to Comment

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Dear William Lider:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following responses to your comments.

### **Impacts to Wildlife**

Potential project-related impacts to wildlife as a result of the Proposed Action were assessed in Section 6.3 of the DSEA in accordance with FAA Order 1050.1F. There are no known Federally-listed species documented on the Airport and no designated Critical Habitats within one mile. Approximately one mile to the west of Paine Field, Puget Sound contains Critical Habitat for Federally-listed Chinook salmon, bull trout and Puget Sound Southern Resident killer whale. None of these aquatic habitats would be affected by the Proposed Action.

Public observations of special status species were located outside the project area. Because there is no construction and flight paths would not change, it was determined that no substantial impacts to wildlife would occur to species outside the study 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. Since a No Effect determination was made, consultation is not required pursuant with the USFWS pursuant to the Endangered Species Act (ESA).

### **Water Quality Impacts**

Water quality considerations related to airport development and operation often include increased surface runoff; erosion; 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 Snohomish County's 2016 Drainage Manual, which includes stormwater detention and water quality requirements. The Airport also operates under Permit WAR000428 issued to Snohomish County under the State of Washington's Industrial Stormwater General Permit. Surface water and stormwater runoff is captured and conveyed in a series of constructed bioswales, storm drain pipes, catch basins, detention facilities and constructed stormwater ponds throughout the area.

There would be no change in impervious surface areas as a result of the Proposed Action. Additionally, Commercial aircraft maintenance and washing activities are not expected as a result of the Proposed Action.

The Airport operates under Permit WAR000428 issued to Snohomish County under the State of Washington's Industrial Stormwater General Permit, the associated Paine Field Stormwater Pollution Prevention Plan (2015), and the Snohomish County's 2016 Drainage Manual. Per stormwater detention and water quality requirements, surface water and stormwater runoff are captured and conveyed in a series of constructed bioswales, storm drain pipes, catch basins, detention facilities, and constructed stormwater ponds throughout the area. The Airport follows best management practices for deicing and anti-icing operations, and provides monitoring data to the Department of Ecology in accordance with the terms of the Permit. Paine Field does not use Airport deicing products that contain urea, and this practice is certified in the Paine Field Annual Reports. Additionally, Paine Field does not use glycol-based deicing chemicals. Thus, testing for the five additional parameters is not applicable to Paine Field operations at this time. Propeller would obtain a National Pollutant Discharge Elimination System (NPDES) Industrial Stormwater Permit for the deicing activities at the gates. Should future deicing operations change and exceed the 100,000-gallon glycol-based deicing benchmark, additional sampling activities will occur in accordance with the Permit at the discharge locations associated with the deicing activities.

### **Master Drainage Plan**

References to the Master Drainage Plan will be updated to refer to the 2016 Drainage Manual. Although there are no changes in flow or impervious surface with implementation of the Proposed Action, any future work would be conducted in accordance with local codes.

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# Comment Form

**Snohomish County Airport/Paine Field  
Draft Supplemental Environmental Assessment  
Public Information Workshop  
Monday, October 29, 2018**

Name: William PAVAO  
 Address: 340 MELISSA ST, Camano Is, WA, 98282  
360-399-8329  
 Phone or  
 Email: W1Pavao@Outlook.com

Please provide comments in the area below. (See back or attach additional sheets if necessary):

Concern over what the impact is with the existing traffic coming south to Seattle from the North End. I see a savings with Paine Field Terminal on Auto Pollution from all the cars NOT traveling south. I myself fly back and forth a large amount, with the new terminal I can possibly save 2 1/2 hours without my vehicle running polluting. Also the additional wear & tear, maintenance on I-5 without the new terminal. Already the I-5 traffic corridor is one of the busiest in the nation. Today the newer airplanes are quieter for airlines with minimal impact increase of noise. With the increase of people moving into our area I don't see a choice but to have an area with air service on North End.

The comment period ends on November 2, 2018. Comments may be submitted at the Public Information Workshop or to the following addresses:

EMAIL: [PaineField@esassoc.com](mailto:PaineField@esassoc.com)

MAIL: ENVIRONMENTAL SCIENCE ASSOCIATES  
 PAINE FIELD SUPPLEMENTAL EA  
 5309 SHILSHOLE AVE NW, SUITE 200  
 SEATTLE, WA 98107

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## **Response to Comment**

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Dear William Pavao:

Thank you for your comments regarding the Proposed Action at Paine Field.

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From: Tom Harmon <[seahurst2@gmail.com](mailto:seahurst2@gmail.com)>  
Sent: Tuesday, October 30, 2018 7:42 PM  
To: Paine Field <[painefield@esassoc.com](mailto:painefield@esassoc.com)>  
Subject: airport needed

I did not attend the meeting last night in Lynnwood because the opposition was well organized and bound to be vocal.

I am a resident of the Old Town portion of Mukilteo and I wait with great anticipation to the opening of PAE to commercial flights.

Tom Harmon  
610 Front St  
Mukilteo

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## **Response to Comment**

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Dear Tom Harmon:

Thank you for your comments regarding the Proposed Action at Paine Field.

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**From:** Paula Karlberg <[pakarlberg@comcast.net](mailto:pakarlberg@comcast.net)>

**Sent:** Tuesday, October 30, 2018 8:00 PM

**To:** Paine Field <[painefield@esassoc.com](mailto:painefield@esassoc.com)>

**Subject:** Supplemental Environmental Assessment for scheduled commercial flights at Paine Field.

To Whom It May Concern:

I am writing to offer my two cents or most likely two quarters these days, with regard to the establishment of commercial flights at Paine Field. I have lived in lake Forest Park for almost 50 years and what were quiet and relaxing summers out in my garden are no longer that. Even without commercial flights from and to Paine Field, there is a plane every single minute of every day that flies over my home. And, that's just the Sea-Tac airport flights. That doesn't include the float planes from Kenmore Air Harbor nor the flights that to in and out of the Whidby Air Naval Station.

The past Sunday's Seattle Times carried a photo of just one day's Sea-Tac flights and it was extremely easy to see why there's no peace and quiet to be found in my own garden...and at times even inside my own home.

I realize this email will have very little effect on the decision to continue with opening Paine Field to commercial flights; however, I wanted to speak out against all the airplane noise pollution which is only going to become worse with each passing year.

Sincerely,

Paula Karlberg  
19604 36 Ave NE  
Lake Forest Park WA 98155-2624

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## Response to Comment

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Dear Paula Karlberg:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### **General Responses**

3-1: Existing Aircraft Noise Concerns

3-6: What Are the Existing and Future Noise Impacts?

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**From:** B D KIRK <[kirksg@msn.com](mailto:kirksg@msn.com)>  
**Sent:** Tuesday, October 30, 2018 7:49 PM  
**To:** Paine Field <[painefield@esassoc.com](mailto:painefield@esassoc.com)>  
**Subject:** Draft Environmental Assessment comment

The draft 2018 Draft Supplemental Environmental Assessment for Proposed Commercial Air Service at Paine Field is insufficient because it uses 65 decibel day-night level (DNL) curves to assess noise impacts, rather than modeling noise levels more appropriate to the area, such as 50 or 55 DNL. The Aviation Environmental Design Tool (AEDT) model should be re-run for 50 or 55 DNL for the final Environmental Assessment, and the FAA and Snohomish County should base any decisions and requirements for mitigations on this more appropriate noise level curve.

While 65 DNL is the minimum noise level required by the FAA in 14 CFR 150, the FAA also encourages jurisdictions to take a more comprehensive approach to noise exposure below 65 DNL, per the Aviation Noise Abatement Policy 2000.

The 65 DNL standard itself is problematic for a number of significant reasons:

- The “Schultz curve” which established the use of 65 DNL was based a single study from the 1970s. The study was controversial when it was published, and has since been superseded by more comprehensive research
- At best, it is a subjective predictor of how many people will be “highly annoyed” by transportation noise, which includes airplanes, highway noise, and trains
- It does not include specific events, such as interruptions of sleep or outside activities

Washington State Department of Transportation guidance for Airports and Compatible Land Use documents additional issues:

- The Schultz curve was developed for a noisy urban environment, not quieter communities.
- The reliance on averaged sound levels ignores the fact that reactions to aircraft noise are driven by individual noise events, as demonstrated through studies of multiple airports.
- Aircraft noise events are intrusive, disruptive and can cause conflict. Rather than being similar to an “ordinary conversation” as cited in the draft Environmental Assessment, WSDOT guidance found airplane noise to be comparable to a power tool such as a chainsaw.

Allowing the airlines to only model the 65 DNL curve for an assessment of noise impacts is inappropriate to Paine Fields location adjacent to quiet residential neighborhoods, schools, and parks. The FAA should require the airlines to produce noise assessment curves using a noise level suitable to the location, such as 50 or 55 DNL. Selection of the appropriate sound level should be done through consultation with state, county, city, and tribal governments. The results of the modeling should be included in the final Environmental Assessment. The FAA and Sonohomish County should base any decisions and negotiations of mitigations on the updated assessment of noise impacts.

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## Response to Comment

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Dear B D Kirk:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### **General Responses**

- 1-3: Flawed/Inadequate Supplemental EA
  - 1-5: Additional Study Should Be Conducted
  - 3-2: Use of the DNL Metric
  - 3-4: Noise Analysis Methodology
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From: Marjorie Fields <[mvfields@me.com](mailto:mvfields@me.com)>  
Sent: Tuesday, October 30, 2018 10:40 PM  
To: Paine Field <[painefield@esassoc.com](mailto:painefield@esassoc.com)>  
Subject: Paine Field Public Information Session Comment

I went to the Paine Field Environmental assessment Information session with a positive attitude about the commercial flight expansion at Paine Field, recognizing the need for such service in our area while also realizing that there would be some negative affects. I expected to hear and see an analysis of those affects at the information session. I came away feeling that Environmental Science Associates group was hired to put one over on the public, not to study or inform.

Instead of analyzing impacts of the airport expansion, the environmental assessment reported no significant issues - an illogical conclusion given the plan for 24 flights daily, double that with takeoff and landings. This conclusion seemed to be the result of artificially limiting the studies. For instance, the noise was calculated in terms of "averages" rather than actual noise during takeoff and landing. Additionally, the flight path study was limited to the area immediately surrounding Paine Field; with nothing on the map showing residential areas further out, much of which obviously would be impacted. The traffic impact was apparently calculated according to some unproven assumption of future reduced general traffic that would offset increased airport traffic. And then there is air quality. Planes are undoubtedly a significant source of pollution, and I feel guilty about how often I fly. Sure, I would like to say that there is "negligible to discountable" impact from planes; but clearly 24 planes landing and taking off daily WILL have an impact.

So now I feel deceived about this project and no longer trust the process or the intent. My previous positive attitude has been replaced by skepticism.

Marjie Fields  
Edmonds

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## Response to Comment

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Dear Marjie Fields:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### **General Responses**

- 1-3: Flawed/Inadequate Supplemental EA
  - 1-7: Study Areas
  - 1-8: Significance of Project Impacts
  - 1-9: How is Significance Defined?
  - 3-2: Use of the DNL Metric
  - 4-1: Sources of Existing Air Pollution
  - 5-2: Traffic Analysis
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**From:** Brian Geppert <[brian@geppert.us](mailto:brian@geppert.us)>  
**Sent:** Tuesday, October 30, 2018 11:30 PM  
**To:** Paine Field <[painefield@esassoc.com](mailto:painefield@esassoc.com)>  
**Subject:** Paine Field commercial flights

Hi!

I just wanted to voice my enthusiastic support for the commercial flights at Paine Field. This will open up a wide array of opportunities to travel for so many people that are put off by all the work required to take a flight out of Sea Tac. It will make travel so much more convenient. I can hardly wait to book my tickets!

I have several coworkers that live around Mukilteo and all are very supportive.

-Brian Geppert  
13924 15<sup>th</sup> ave w  
Lynnwood WA 98087

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## **Response to Comment**

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Dear Brian Geppert:

Thank you for your comments regarding the Proposed Action at Paine Field.

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**From:** janine lindsey <[janine\\_lindsey@yahoo.com](mailto:janine_lindsey@yahoo.com)>  
**Sent:** Wednesday, October 31, 2018 2:42 AM  
**To:** Paine Field <[painefield@esassoc.com](mailto:painefield@esassoc.com)>  
**Subject:** Airport expansion and commercial flights

I am a resident of Mukilteo in an area that is going to be severely affected by the dramatic increase in air traffic.

I want to state simply and vehemently; I object to this rush to expand the airport for commercial flights without proper impact studies.

This demonstrates a disregard for the quality of the lives and value of the property of the residents of both Mukilteo and Everett.

Traffic to the airport combines with traffic from the ferry, commuters to and from work, school zones at 20 mph when active, and emergency vehicles, to paralyze an already inadequate road system through Mukilteo. Left turns onto side streets stop traffic on the north end of the speedway where there are two lanes. Trying to enter the speedway from those same streets creates a miserable wait time and a miasma of backups.

Airport road has the same problem as the speedway, with it's minimal redemption being a wider lane width for most of its length.

Noise levels have not been studied at all where I live. A decibel check by my home would reveal how loud jets are.

The level on a fighter jet is exceptional. Have military jets been considered? They fly over my home. How about the unmuffled engines of many small single or double prop planes? They fly over my home. Have the test flights Boeing does on newly assembled jets been factored in? These fly over my home as well.

The lack of 24 hr tower direction, if true, is horrifying. Who allows this? It is a situation for potential disaster.

People become angry and move away because the safety and quality of their neighborhoods plummet. When they find they have lost property value, they file lawsuits to recoup their investments.

Tax bases decrease when homes are devalued. Everyone loses.

Please consider the real human and financial impact of the expansion of Paine Field for commercial use.

Janine Lindsey  
1531 3rd Ln  
Mukilteo 98275  
425-514-0392

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## Response to Comment

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Dear Janine Lindsey:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### **General Responses**

- 1-2: Scope of the Supplemental EA Analysis for Future Operations and Passengers
  - 1-3: Flawed/Inadequate Supplemental EA
  - 3-1: Existing Aircraft Noise Concerns
  - 3-2: Use of the DNL Metric
  - 3-3: Noise Measurements and Supplemental Metrics Requested
  - 5-1: Existing and Future Traffic
  - 5-2: Traffic Analysis
  - 6-1: What are the Quality of Life Impacts?
  - 6-2: What is the Impact on Property Values?
  - 6-6: What are the Safety Impacts due to the Air Traffic Control Tower Hours?
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**From:** Anders Olin <[olinlegal@gmail.com](mailto:olinlegal@gmail.com)>  
**Sent:** Wednesday, October 31, 2018 1:48 PM  
**To:** Paine Field <[painefield@esassoc.com](mailto:painefield@esassoc.com)>  
**Subject:** Paine Field Commercial Flights

I reside in Mukilteo and am greatly supportive of commercial flights out of Paine Field. I, along with countless other citizens of North County, will benefit immensely from being able to avoid the time and inconvenience of having to drive through the congested bottleneck that is I-5 south through Seattle. I am confident that any concerns or fears of potential adverse impacts of commercial flights out of Paine Field as proposed will be greatly outweighed by the benefits and appropriate mitigation efforts.

Anders Olin

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## **Response to Comment**

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Dear Anders Olin:

Thank you for your comments regarding the Proposed Action at Paine Field.

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From: [christopherandbrandon@gmail.com](mailto:christopherandbrandon@gmail.com) <[christopherandbrandon@gmail.com](mailto:christopherandbrandon@gmail.com)>

Sent: Wednesday, October 31, 2018 2:15 PM

To: Paine Field <[painefield@esassoc.com](mailto:painefield@esassoc.com)>

Subject: Flight paths

Hi there,

Our family lives at 15008 72nd Ave W, Edmonds, WA 98026. We have a very tightly connected community of families here and are very concerned with increases in noise from planes. We read that sounds levels could reach 65 decibels, which would be devastating to our quiet community. We are committed to ensuring that quality of life is maintained for our families. Please let us know how else we can be involved. Our neighborhood is currently organizing to take this on however necessary.

Thank you,  
Chris and Brandon

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## Response to Comment

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Dear Chris and Brandon:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### **General Responses**

3-2: Use of the DNL Metric

3-6: What Are the Existing and Future Noise Impacts?

6-1: What Are the Quality of Life Impacts?

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From: Angelica and Marco hernandez <[samndrew02@gmail.com](mailto:samndrew02@gmail.com)>  
Sent: Wednesday, October 31, 2018 2:23 PM  
To: Paine Field <[painefield@esassoc.com](mailto:painefield@esassoc.com)>  
Subject: Commercial flying

Hi my name is Angelica and I live in the Mukilteo neighborhood. I am not for commercial flight going out the Paine field. The Mukilteo speedway is already slammed with traffic because of the ferry. Traffic will get worst for our little neighborhood. We are not a neighborhood like Seattle or Tacoma to accommodate an airport.

We have many schools next to pain field, kids have bedtimes and the last thing we want is are kids can't go to sleep because of all the extra aircraft noise. We already are acclimating to the noise there is now. Please don't add extra to our kid and family neighborhood. I moved to this city because of the schools and the tranquility of the neighborhood.

Sent from my iPhone

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## Response to Comment

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Dear Angelica and Marco Hernandez:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### **General Responses**

3-7: Noise Impacts on Schools

5-2: Traffic Analysis

5-3: Ferry Operations

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## Comments to the Draft Supplemental Environmental Assessment for Proposed Commercial Air Service at Paine Field

October 31, 2018

Kevin Stoltz  
904 4<sup>th</sup> Street  
Mukilteo, WA 98275  
(425)344-1071  
kstoltz@citynetwork.com

I deliberately moved to Mukilteo (near PAE) in 1983 and went to work for Boeing in Everett as an Aeronautical Engineer. One of the jobs I had while working at Boeing was as a Noise Staff Engineer. I earned my pilots license at PAE. We raised our son and daughter in Mukilteo.

We've lived in Mukilteo for the past 35 years, the last 14 of which have been in Old Town near the Mukilteo Ferry. Only in the past couple of years have we experienced noise from "nighttime" (10pm-7am) Dreamlifter flights that not only abruptly wake us while sleeping, but as my wife Dana describes, literally "shakes us awake".

Our bedroom is on the 2<sup>nd</sup> floor of our home with the window facing North which is the approach for PAE runway 16R. Measured nighttime ambient noise levels at our home are 30-32 dBA and measured noise levels at our home for Dreamlifter arrivals are typically 70-75 dBA and departures are 75-80 dBA (unless they turn out early in which case they are significantly higher earning the "shakes us awake" title.)

Based on our current experience with the nighttime Dreamlifter flights that occur on average once every 3 days (FlightAware data, Jan 2018-Aug 2018, attached), we fear the projected 4.5 scheduled CAS nighttime flights will force us to move. We're already contemplating needing to move due to the Dreamlifter flights but are hopeful Boeing will help curtail its evening Dreamlifter flights.

At a recent Paine Field Community Council meeting, airport staff told us the scheduled CAS flights would start as early as 5am and run as late as midnight. That only leaves us a 5 hour block for sleep and combined with the random nature of the nighttime Dreamlifter flights we'll be forced to move. Granted, the nighttime Dreamlifter flights tend to come in bursts. For example, just this past Saturday early morning, there were Dreamlifter flights (two arrivals and two departures) at 1:12am, 3:31am, 4:54am and 6:57am.

The 1990 ANCA (Airport Noise and Capacity Act) prevents local jurisdictions from imposing nighttime curfews on aircraft flights. However, it also has provisions that allow voluntary curfews to be imposed. I believe this option should be spelled out in the EA to encourage the aircraft operators and our elected officials to work together to mitigate the adverse noise impacts that some of us are already experiencing.

Unresolved questions:

## **P92 - Duplicate of P62**

- Why doesn't the EA mention that local jurisdictions can work with aircraft operators to implement voluntary curfews to mitigate the adverse impact nighttime flights can have on the community?
- Did the EA include the recent increase of nighttime Dreamlifter flights that are currently impacting our ability to get a reasonable night's sleep on a consistent basis?
- Why doesn't the airport and elected officials make a visible effort to discourage nighttime flights that have such a detrimental impact on some of us?
- What options or help is available to noise proof our home or assist us in moving?

Attached:

FlightAware data of Dreamlifter flights at PAE with nighttime operations highlighted in yellow, Jan 2018-Aug 2018



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## P92 - Duplicate of P62

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Date	Aircraft	Origin	Destination	Departure	Arrival	Duration
<a href="#">28-Aug-2018</a>	BLCF	Snohomish County (KPAE)	Mc Connell Afb (KIAB)	07:40PM PDT	12:28AM CDT (+1)	2:47
<a href="#">23-Aug-2018</a>	BLCF	Snohomish County (KPAE)	Mc Connell Afb (KIAB)	06:01AM PDT	10:44AM CDT	2:42
<a href="#">22-Aug-2018</a>	BLCF	Snohomish County (KPAE)	Mc Connell Afb (KIAB)	06:56AM PDT	11:44AM CDT	2:47
<a href="#">14-Aug-2018</a>	BLCF	Snohomish County (KPAE)	Mc Connell Afb (KIAB)	03:55PM PDT	08:42PM CDT	2:46
<a href="#">07-Aug-2018</a>	BLCF	Snohomish County (KPAE)	Mc Connell Afb (KIAB)	05:40PM PDT	10:24PM CDT	2:43
<a href="#">03-Aug-2018</a>	BLCF	Snohomish County (KPAE)	Mc Connell Afb (KIAB)	04:58AM PDT	09:43AM CDT	2:44
<a href="#">27-Jul-2018</a>	BLCF	Snohomish County (KPAE)	Mc Connell Afb (KIAB)	04:06AM PDT	08:45AM CDT	2:39
<a href="#">20-Jul-2018</a>	BLCF	Snohomish County (KPAE)	Mc Connell Afb (KIAB)	10:44AM PDT	03:31PM CDT	2:46
<a href="#">17-Jul-2018</a>	BLCF	Snohomish County (KPAE)	Mc Connell Afb (KIAB)	04:47PM PDT	09:29PM CDT	2:41
<a href="#">13-Jul-2018</a>	BLCF	Snohomish County (KPAE)	Mc Connell Afb (KIAB)	04:01PM PDT	08:48PM CDT	2:46
<a href="#">28-Jun-2018</a>	BLCF	Snohomish County (KPAE)	Mc Connell Afb (KIAB)	05:03AM PDT	09:54AM CDT	2:50
<a href="#">26-Jun-2018</a>	BLCF	Snohomish County (KPAE)	Mc Connell Afb (KIAB)	05:11AM PDT	10:03AM CDT	2:51
<a href="#">21-Jun-2018</a>	BLCF	Snohomish County (KPAE)	Mc Connell Afb (KIAB)	04:48AM PDT	09:32AM CDT	2:43
<a href="#">19-Jun-2018</a>	BLCF	Snohomish County (KPAE)	Mc Connell Afb (KIAB)	04:41AM PDT	09:31AM CDT	2:49
<a href="#">14-Jun-2018</a>	BLCF	Snohomish County (KPAE)	Mc Connell Afb (KIAB)	11:22AM PDT	04:09PM CDT	2:46
<a href="#">08-Jun-2018</a>	BLCF	Snohomish County (KPAE)	Mc Connell Afb (KIAB)	01:46AM PDT	06:36AM CDT	2:49
<a href="#">05-Jun-2018</a>	BLCF	Snohomish County (KPAE)	Mc Connell Afb (KIAB)	05:35AM PDT	10:24AM CDT	2:48
<a href="#">24-May-2018</a>	BLCF	Snohomish County (KPAE)	Mc Connell Afb (KIAB)	05:21AM PDT	10:08AM CDT	2:46
<a href="#">17-May-2018</a>	BLCF	Snohomish County (KPAE)	Mc Connell Afb (KIAB)	08:55PM PDT	01:55AM CDT (+1)	2:59
<a href="#">15-May-2018</a>	BLCF	Snohomish County (KPAE)	Mc Connell Afb (KIAB)	06:07AM PDT	11:08AM CDT	3:00
<a href="#">09-May-2018</a>	BLCF	Snohomish County (KPAE)	Mc Connell Afb (KIAB)	12:16PM PDT	05:02PM CDT	2:45
<a href="#">02-May-2018</a>	BLCF	Snohomish County (KPAE)	Mc Connell Afb (KIAB)	05:41AM PDT	10:32AM CDT	2:50
<a href="#">26-Apr-2018</a>	BLCF	Snohomish County (KPAE)	Mc Connell Afb (KIAB)	06:05AM PDT	10:58AM CDT	2:52
<a href="#">23-Apr-2018</a>	BLCF	Snohomish County (KPAE)	Mc Connell Afb (KIAB)	06:49AM PDT	11:37AM CDT	2:47
<a href="#">19-Apr-2018</a>	BLCF	Snohomish County (KPAE)	Mc Connell Afb (KIAB)	06:49AM PDT	11:41AM CDT	2:51
<a href="#">16-Apr-2018</a>	BLCF	Snohomish County (KPAE)	Mc Connell Afb (KIAB)	06:47AM PDT	11:33AM CDT	2:45
<a href="#">10-Apr-2018</a>	BLCF	Snohomish County (KPAE)	Mc Connell Afb (KIAB)	05:28AM PDT	10:06AM CDT	2:37
<a href="#">05-Apr-2018</a>	BLCF	Snohomish County (KPAE)	Mc Connell Afb (KIAB)	06:41AM PDT	11:18AM CDT	2:36
<a href="#">02-Apr-2018</a>	BLCF	Snohomish County (KPAE)	Mc Connell Afb (KIAB)	04:35PM PDT	09:18PM CDT	2:42
<a href="#">28-Mar-2018</a>	BLCF	Snohomish County (KPAE)	Mc Connell Afb (KIAB)	06:49AM PDT	11:28AM CDT	2:38
<a href="#">23-Mar-2018</a>	BLCF	Snohomish County (KPAE)	Mc Connell Afb (KIAB)	03:56AM PDT	08:44AM CDT	2:47

Date	Aircraft	Origin	Destination	Departure	Arrival	Duration
<a href="#">20-Mar-2018</a>	BLCF	Snohomish County (KPAE)	Mc Connell Afb (KIAB)	06:57AM PDT	11:34AM CDT	2:36
<a href="#">15-Mar-2018</a>	BLCF	Snohomish County (KPAE)	Mc Connell Afb (KIAB)	06:40AM PDT	11:39AM CDT	2:58
<a href="#">12-Mar-2018</a>	BLCF	Snohomish County (KPAE)	Mc Connell Afb (KIAB)	06:55AM PDT	11:39AM CDT	2:43
<a href="#">07-Mar-2018</a>	BLCF	Snohomish County (KPAE)	Mc Connell Afb (KIAB)	07:13AM PST	11:50AM CST	2:36
<a href="#">02-Mar-2018</a>	BLCF	Snohomish County (KPAE)	Mc Connell Afb (KIAB)	03:50AM PST	08:31AM CST	2:40
<a href="#">27-Feb-2018</a>	BLCF	Snohomish County (KPAE)	Mc Connell Afb (KIAB)	05:37AM PST	10:21AM CST	2:43
<a href="#">22-Feb-2018</a>	BLCF	Snohomish County (KPAE)	Mc Connell Afb (KIAB)	07:35PM PST	12:27AM CST (+1)	2:51
<a href="#">19-Feb-2018</a>	BLCF	Snohomish County (KPAE)	Mc Connell Afb (KIAB)	10:40AM PST	03:33PM CST	2:52
<a href="#">14-Feb-2018</a>	BLCF	Snohomish County (KPAE)	Mc Connell Afb (KIAB)	05:50AM PST	10:33AM CST	2:43
<a href="#">09-Feb-2018</a>	BLCF	Snohomish County (KPAE)	Mc Connell Afb (KIAB)	06:16AM PST	10:49AM CST	2:32
<a href="#">01-Feb-2018</a>	BLCF	Snohomish County (KPAE)	Mc Connell Afb (KIAB)	05:45AM PST	10:13AM CST	2:27
<a href="#">24-Jan-2018</a>	BLCF	Snohomish County (KPAE)	Mc Connell Afb (KIAB)	05:45AM PST	10:25AM CST	2:39
<a href="#">18-Jan-2018</a>	BLCF	Snohomish County (KPAE)	Mc Connell Afb (KIAB)	03:45PM PST	08:28PM CST	2:42
<a href="#">16-Jan-2018</a>	BLCF	Snohomish County (KPAE)	Mc Connell Afb (KIAB)	10:15PM PST	03:05AM CST (+1)	2:49
<a href="#">14-Jan-2018</a>	BLCF	Snohomish County (KPAE)	Mc Connell Afb (KIAB)	09:45AM PST	02:35PM CST	2:49
<a href="#">08-Jan-2018</a>	BLCF	Snohomish County (KPAE)	Mc Connell Afb (KIAB)	09:52AM PST	02:28PM CST	2:35

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#### ACTIVITY LOG

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Date	Aircraft	Origin	Destination	Departure	Arrival	Duration
<a href="#">30-Aug-2018</a>	BLCF	Snohomish County (KPAE)	Charleston Intl/AFB (KCHS)	11:55AM PDT	07:11PM EDT	4:15
<a href="#">22-Aug-2018</a>	BLCF	Snohomish County (KPAE)	Charleston Intl/AFB (KCHS)	01:20PM PDT	08:47PM EDT	4:26
<a href="#">13-Aug-2018</a>	BLCF	Snohomish County (KPAE)	Charleston Intl/AFB (KCHS)	06:25PM PDT	01:56AM EDT (+1)	4:30
<a href="#">25-Jul-2018</a>	BLCF	Snohomish County (KPAE)	Charleston Intl/AFB (KCHS)	10:27AM PDT	05:48PM EDT	4:20
<a href="#">13-Jul-2018</a>	BLCF	Snohomish County (KPAE)	Charleston Intl/AFB (KCHS)	01:53PM PDT	09:23PM EDT	4:30
<a href="#">19-Jun-2018</a>	BLCF	Snohomish County (KPAE)	Charleston Intl/AFB (KCHS)	03:28PM PDT	11:12PM EDT	4:43
<a href="#">29-May-2018</a>	BLCF	Snohomish County (KPAE)	Charleston Intl/AFB (KCHS)	05:36PM PDT	01:25AM EDT (+1)	4:48
<a href="#">25-May-2018</a>	BLCF	Snohomish County (KPAE)	Charleston Intl/AFB (KCHS)	06:16AM PDT	01:54PM EDT	4:37
<a href="#">18-May-2018</a>	BLCF	Snohomish County (KPAE)	Charleston Intl/AFB (KCHS)	10:19PM PDT	06:01AM EDT (+1)	4:41
<a href="#">10-May-2018</a>	BLCF	Snohomish County (KPAE)	Charleston Intl/AFB (KCHS)	10:00AM PDT	05:21PM EDT	4:21
<a href="#">07-May-2018</a>	BLCF	Snohomish County (KPAE)	Charleston Intl/AFB (KCHS)	03:29PM PDT	11:07PM EDT	4:37
<a href="#">04-May-2018</a>	BLCF	Snohomish County (KPAE)	Charleston Intl/AFB (KCHS)	09:14AM PDT	04:40PM EDT	4:25
<a href="#">03-May-2018</a>	BLCF	Snohomish County (KPAE)	Charleston Intl/AFB (KCHS)	06:36AM PDT	02:18PM EDT	4:41
<a href="#">28-Apr-2018</a>	BLCF	Snohomish County (KPAE)	Charleston Intl/AFB (KCHS)	01:39PM PDT	09:18PM EDT	4:38
<a href="#">20-Apr-2018</a>	BLCF	Snohomish County (KPAE)	Charleston Intl/AFB (KCHS)	08:05AM PDT	03:39PM EDT	4:33
<a href="#">29-Mar-2018</a>	BLCF	Snohomish County (KPAE)	Charleston Intl/AFB (KCHS)	05:58AM PDT	01:27PM EDT	4:29
<a href="#">23-Mar-2018</a>	BLCF	Snohomish County (KPAE)	Charleston Intl/AFB (KCHS)	02:55PM PDT	10:12PM EDT	4:17
<a href="#">16-Mar-2018</a>	BLCF	Snohomish County (KPAE)	Charleston Intl/AFB (KCHS)	08:35AM PDT	04:27PM EDT	4:51
<a href="#">14-Mar-2018</a>	BLCF	Snohomish County (KPAE)	Charleston Intl/AFB (KCHS)	12:04PM PDT	07:36PM EDT	4:31
<a href="#">10-Mar-2018</a>	BLCF	Snohomish County (KPAE)	Charleston Intl/AFB (KCHS)	10:34AM PST	06:06PM EST	4:32
<a href="#">08-Mar-2018</a>	BLCF	Snohomish County (KPAE)	Charleston Intl/AFB (KCHS)	04:34PM PST	11:54PM EST	4:19
<a href="#">03-Mar-2018</a>	BLCF	Snohomish County (KPAE)	Charleston Intl/AFB (KCHS)	12:09AM PST	07:30AM EST	4:20
<a href="#">23-Feb-2018</a>	BLCF	Snohomish County (KPAE)	Charleston Intl/AFB (KCHS)	12:06PM PST	07:42PM EST	4:35
<a href="#">15-Feb-2018</a>	BLCF	Snohomish County (KPAE)	Charleston Intl/AFB (KCHS)	12:08PM PST	07:25PM EST	4:16
<a href="#">12-Feb-2018</a>	BLCF	Snohomish County (KPAE)	Charleston Intl/AFB (KCHS)	09:27AM PST	05:06PM EST	4:38
<a href="#">06-Feb-2018</a>	BLCF	Snohomish County (KPAE)	Charleston Intl/AFB (KCHS)	05:26PM PST	12:47AM EST (+1)	4:20
<a href="#">05-Feb-2018</a>	BLCF	Snohomish County (KPAE)	Charleston Intl/AFB (KCHS)	12:16PM PST	07:52PM EST	4:35
<a href="#">26-Jan-2018</a>	BLCF	Snohomish County (KPAE)	Charleston Intl/AFB (KCHS)	07:50PM PST	03:15AM EST (+1)	4:25
<a href="#">26-Jan-2018</a>	BLCF	Snohomish County (KPAE)	Charleston Intl/AFB (KCHS)	07:50AM PST	03:21PM EST	4:30
<a href="#">22-Jan-2018</a>	BLCF	Snohomish County (KPAE)	Charleston Intl/AFB (KCHS)	07:09AM PST	02:43PM EST	4:33
<a href="#">19-Jan-2018</a>	BLCF	Snohomish County (KPAE)	Charleston Intl/AFB (KCHS)	01:50PM PST	09:23PM EST	4:32

X

Date	Aircraft	Origin	Destination	Departure	Arrival	Duration
<a href="#">14-Jan-2018</a>	BLCF	Snohomish County (KPAE)	Charleston Intl/AFB (KCHS)	11:10AM PST	06:45PM EST	4:34
<a href="#">11-Jan-2018</a>	BLCF	Snohomish County (KPAE)	Charleston Intl/AFB (KCHS)	11:40AM PST	07:12PM EST	4:31
<a href="#">07-Jan-2018</a>	BLCF	Snohomish County (KPAE)	Charleston Intl/AFB (KCHS)	09:54PM PST	05:11AM EST (+1)	4:16

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# GTI4536 Flight Activity History

GTI4536

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### Filter by date

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#### ACTIVITY LOG

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Date	Aircraft	Origin	Destination	Departure	Arrival	Duration
<a href="#">20-Aug-2018</a>	BLCF	<a href="#">Snohomish County (KPAE)</a>	<a href="#">Charleston Intl/AFB (KCHS)</a>	06:32AM PDT	02:01PM EDT	4:29
<a href="#">18-Aug-2018</a>	BLCF	<a href="#">Snohomish County (KPAE)</a>	<a href="#">Charleston Intl/AFB (KCHS)</a>	10:34AM PDT	05:55PM EDT	4:20
<a href="#">13-Aug-2018</a>	BLCF	<a href="#">Snohomish County (KPAE)</a>	<a href="#">Charleston Intl/AFB (KCHS)</a>	03:34PM PDT	11:00PM EDT	4:25
<a href="#">08-Aug-2018</a>	BLCF	<a href="#">Snohomish County (KPAE)</a>	<a href="#">Charleston Intl/AFB (KCHS)</a>	11:12PM PDT	06:42AM EDT (+1)	4:29
<a href="#">03-Aug-2018</a>	BLCF	<a href="#">Snohomish County (KPAE)</a>	<a href="#">Charleston Intl/AFB (KCHS)</a>	05:52AM PDT	01:22PM EDT	4:29
<a href="#">30-Jul-2018</a>	BLCF	<a href="#">Snohomish County (KPAE)</a>	<a href="#">Charleston Intl/AFB (KCHS)</a>	10:15AM PDT	05:42PM EDT	4:26
<a href="#">25-Jul-2018</a>	BLCF	<a href="#">Snohomish County (KPAE)</a>	<a href="#">Charleston Intl/AFB (KCHS)</a>	07:10PM PDT	02:24AM EDT (+1)	4:13
<a href="#">17-Jul-2018</a>	BLCF	<a href="#">Snohomish County (KPAE)</a>	<a href="#">Charleston Intl/AFB (KCHS)</a>	03:24PM PDT	10:45PM EDT	4:21
<a href="#">16-Jul-2018</a>	BLCF	<a href="#">Snohomish County (KPAE)</a>	<a href="#">Charleston Intl/AFB (KCHS)</a>	11:09AM PDT	06:31PM EDT	4:21
<a href="#">10-Jul-2018</a>	BLCF	<a href="#">Snohomish County (KPAE)</a>	<a href="#">Charleston Intl/AFB (KCHS)</a>	03:40PM PDT	11:10PM EDT	4:29
<a href="#">29-Jun-2018</a>	BLCF	<a href="#">Snohomish County (KPAE)</a>	<a href="#">Charleston Intl/AFB (KCHS)</a>	08:05AM PDT	03:40PM EDT	4:34
<a href="#">28-Jun-2018</a>	BLCF	<a href="#">Snohomish County (KPAE)</a>	<a href="#">Charleston Intl/AFB (KCHS)</a>	02:20PM PDT	09:52PM EDT	4:32
<a href="#">25-Jun-2018</a>	BLCF	<a href="#">Snohomish County (KPAE)</a>	<a href="#">Charleston Intl/AFB (KCHS)</a>	02:27AM PDT	10:13AM EDT	4:46
<a href="#">22-Jun-2018</a>	BLCF	<a href="#">Snohomish County (KPAE)</a>	<a href="#">Charleston Intl/AFB (KCHS)</a>	02:12PM PDT	09:32PM EDT	4:19
<a href="#">21-Jun-2018</a>	BLCF	<a href="#">Snohomish County (KPAE)</a>	<a href="#">Charleston Intl/AFB (KCHS)</a>	07:39PM PDT	03:21AM EDT (+1)	4:41
<a href="#">18-Jun-2018</a>	BLCF	<a href="#">Snohomish County (KPAE)</a>	<a href="#">Charleston Intl/AFB (KCHS)</a>	01:06PM PDT	08:58PM EDT	4:51
<a href="#">12-Jun-2018</a>	BLCF	<a href="#">Snohomish County (KPAE)</a>	<a href="#">Charleston Intl/AFB (KCHS)</a>	02:25AM PDT	10:23AM EDT	4:57
<a href="#">08-Jun-2018</a>	BLCF	<a href="#">Snohomish County (KPAE)</a>	<a href="#">Charleston Intl/AFB (KCHS)</a>	09:50PM PDT	05:30AM EDT (+1)	4:39
<a href="#">02-Jun-2018</a>	BLCF	<a href="#">Snohomish County (KPAE)</a>	<a href="#">Charleston Intl/AFB (KCHS)</a>	02:23PM PDT	09:53PM EDT	4:29
<a href="#">30-May-2018</a>	BLCF	<a href="#">Snohomish County (KPAE)</a>	<a href="#">Charleston Intl/AFB (KCHS)</a>	01:56PM PDT	09:22PM EDT	4:25
<a href="#">20-Apr-2018</a>	BLCF	<a href="#">Snohomish County (KPAE)</a>	<a href="#">Charleston Intl/AFB (KCHS)</a>	06:04AM PDT	01:35PM EDT	4:30
<a href="#">17-Apr-2018</a>	BLCF	<a href="#">Snohomish County (KPAE)</a>	<a href="#">Charleston Intl/AFB (KCHS)</a>	05:58AM PDT	01:26PM EDT	4:27
<a href="#">11-Apr-2018</a>	BLCF	<a href="#">Snohomish County (KPAE)</a>	<a href="#">Charleston Intl/AFB (KCHS)</a>	07:02AM PDT	02:15PM EDT	4:13
<a href="#">06-Apr-2018</a>	BLCF	<a href="#">Snohomish County (KPAE)</a>	<a href="#">Charleston Intl/AFB (KCHS)</a>	07:03AM PDT	02:20PM EDT	4:16
<a href="#">23-Mar-2018</a>	BLCF	<a href="#">Snohomish County (KPAE)</a>	<a href="#">Charleston Intl/AFB (KCHS)</a>	08:43PM PDT	04:02AM EDT (+1)	4:18
<a href="#">15-Feb-2018</a>	BLCF	<a href="#">Snohomish County (KPAE)</a>	<a href="#">Charleston Intl/AFB (KCHS)</a>	07:28AM PST	02:42PM EST	4:13
<a href="#">03-Feb-2018</a>	BLCF	<a href="#">Snohomish County (KPAE)</a>	<a href="#">Charleston Intl/AFB (KCHS)</a>	01:41PM PST	08:55PM EST	4:13
<a href="#">03-Feb-2018</a>	BLCF	<a href="#">Snohomish County (KPAE)</a>	<a href="#">Charleston Intl/AFB (KCHS)</a>	07:58AM PST	03:15PM EST	4:17

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## GTI4512 Flight Activity History

GTI4512

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### Filter by date

Show flights between

and

#### ACTIVITY LOG

Want a full history search for GTI4512 dating back to 1998? Buy now. Get it within one hour.

Date	Aircraft	Origin	Destination	Departure	Arrival	Duration
<a href="#">29-Aug-2018</a>	BLCF	Snohomish County (KPAE)	Chubu Centrair Int'l (Centrair) (NGO / RJGG)	09:44AM PDT	12:14PM JST (+1)	10:29
<a href="#">21-Aug-2018</a>	BLCF	Snohomish County (KPAE)	Chubu Centrair Int'l (Centrair) (NGO / RJGG)	11:28AM PDT	01:20PM JST (+1)	9:51
<a href="#">20-Aug-2018</a>	BLCF	Snohomish County (KPAE)	Chubu Centrair Int'l (Centrair) (NGO / RJGG)	04:47AM PDT	06:16AM JST (+1)	9:28
<a href="#">15-Aug-2018</a>	BLCF	Snohomish County (KPAE)	Chubu Centrair Int'l (Centrair) (NGO / RJGG)	12:56PM PDT	03:18PM JST (+1)	10:21
<a href="#">10-Aug-2018</a>	BLCF	Snohomish County (KPAE)	Chubu Centrair Int'l (Centrair) (NGO / RJGG)	07:53AM PDT	10:13AM JST (+1)	10:19
<a href="#">07-Aug-2018</a>	BLCF	Snohomish County (KPAE)	Chubu Centrair Int'l (Centrair) (NGO / RJGG)	09:52AM PDT	12:05PM JST (+1)	10:12
<a href="#">27-Jul-2018</a>	BLCF	Snohomish County (KPAE)	Chubu Centrair Int'l (Centrair) (NGO / RJGG)	04:51AM PDT	06:31AM JST (+1)	9:39
<a href="#">25-Jul-2018</a>	BLCF	Snohomish County (KPAE)	Chubu Centrair Int'l (Centrair) (NGO / RJGG)	09:19PM PDT	10:45PM JST (+1)	9:25
<a href="#">18-Jul-2018</a>	BLCF	Snohomish County (KPAE)	Chubu Centrair Int'l (Centrair) (NGO / RJGG)	03:23PM PDT	04:56PM JST (+1)	9:32
<a href="#">12-Jul-2018</a>	BLCF	Snohomish County (KPAE)	Chubu Centrair Int'l (Centrair) (NGO / RJGG)	01:00PM PDT	03:01PM JST (+1)	10:00
<a href="#">11-Jul-2018</a>	BLCF	Snohomish County (KPAE)	Chubu Centrair Int'l (Centrair) (NGO / RJGG)	03:36PM PDT	05:50PM JST (+1)	10:13
<a href="#">10-Jul-2018</a>	BLCF	Snohomish County (KPAE)	Chubu Centrair Int'l (Centrair) (NGO / RJGG)	10:16AM PDT	12:07PM JST (+1)	9:51
<a href="#">27-Jun-2018</a>	BLCF	Snohomish County (KPAE)	Chubu Centrair Int'l (Centrair) (NGO / RJGG)	10:26AM PDT	12:14PM JST (+1)	9:47
<a href="#">16-Jun-2018</a>	BLCF	Snohomish County (KPAE)	Chubu Centrair Int'l (Centrair) (NGO / RJGG)	06:35PM PDT	08:17PM JST (+1)	9:41
<a href="#">06-Jun-2018</a>	BLCF	Snohomish County (KPAE)	Chubu Centrair Int'l (Centrair) (NGO / RJGG)	02:39PM PDT	04:25PM JST (+1)	9:45
<a href="#">31-May-2018</a>	BLCF	Snohomish County (KPAE)	Chubu Centrair Int'l (Centrair) (NGO / RJGG)	12:10PM PDT	02:30PM JST (+1)	10:19
<a href="#">29-May-2018</a>	BLCF	Snohomish County (KPAE)	Chubu Centrair Int'l (Centrair) (NGO / RJGG)	10:17AM PDT	12:27PM JST (+1)	10:09
<a href="#">25-May-2018</a>	BLCF	Snohomish County (KPAE)	Chubu Centrair Int'l (Centrair) (NGO / RJGG)	11:40AM PDT	01:45PM JST (+1)	10:04
<a href="#">22-May-2018</a>	BLCF	Charleston Int'l/AFB (KCHS)	Snohomish County (KPAE)	10:17AM EDT	12:14PM PDT	4:56

Date	Aircraft	Origin	Destination	Departure	Arrival	Duration
<a href="#">21-May-2018</a>	BLCF	Snohomish County (KPAE)	Chubu Centrair Int'l (Centrair) (NGO / RJGG)	06:36AM PDT	08:32AM JST (+1)	9:55
<a href="#">16-May-2018</a>	BLCF	Snohomish County (KPAE)	Chubu Centrair Int'l (Centrair) (NGO / RJGG)	10:21AM PDT	12:22PM JST (+1)	10:00
<a href="#">03-May-2018</a>	BLCF	Snohomish County (KPAE)	Chubu Centrair Int'l (Centrair) (NGO / RJGG)	04:46AM PDT	07:22AM JST (+1)	10:35
<a href="#">01-May-2018</a>	BLCF	Snohomish County (KPAE)	Chubu Centrair Int'l (Centrair) (NGO / RJGG)	10:14AM PDT	12:57PM JST (+1)	10:42
<a href="#">30-Apr-2018</a>	BLCF	Snohomish County (KPAE)	Chubu Centrair Int'l (Centrair) (NGO / RJGG)	07:17AM PDT	09:36AM JST (+1)	10:18
<a href="#">29-Apr-2018</a>	BLCF	Anchorage Intl (PANC)	Chubu Centrair Int'l (Centrair) (NGO / RJGG)	12:17PM AKDT	01:12PM JST (+1)	7:55
<a href="#">25-Apr-2018</a>	BLCF	Snohomish County (KPAE)	Chubu Centrair Int'l (Centrair) (NGO / RJGG)	10:32AM PDT	12:53PM JST (+1)	10:20
<a href="#">24-Apr-2018</a>	BLCF	Snohomish County (KPAE)	Chubu Centrair Int'l (Centrair) (NGO / RJGG)	09:26AM PDT	12:00PM JST (+1)	10:33
<a href="#">18-Apr-2018</a>	BLCF	Snohomish County (KPAE)	Chubu Centrair Int'l (Centrair) (NGO / RJGG)	09:39AM PDT	11:41AM JST (+1)	10:01
<a href="#">12-Apr-2018</a>	BLCF	Snohomish County (KPAE)	Chubu Centrair Int'l (Centrair) (NGO / RJGG)	02:19PM PDT	04:13PM JST (+1)	9:53
<a href="#">09-Apr-2018</a>	BLCF	Snohomish County (KPAE)	Chubu Centrair Int'l (Centrair) (NGO / RJGG)	09:27AM PDT	11:01AM JST (+1)	9:33
<a href="#">03-Apr-2018</a>	BLCF	Snohomish County (KPAE)	Chubu Centrair Int'l (Centrair) (NGO / RJGG)	12:52PM PDT	03:10PM JST (+1)	10:17
<a href="#">28-Mar-2018</a>	BLCF	Snohomish County (KPAE)	Chubu Centrair Int'l (Centrair) (NGO / RJGG)	04:07PM PDT	06:59PM JST (+1)	10:51
<a href="#">26-Mar-2018</a>	BLCF	Snohomish County (KPAE)	Chubu Centrair Int'l (Centrair) (NGO / RJGG)	10:31AM PDT	12:22PM JST (+1)	9:50
<a href="#">22-Mar-2018</a>	BLCF	Snohomish County (KPAE)	Chubu Centrair Int'l (Centrair) (NGO / RJGG)	09:26AM PDT	11:35AM JST (+1)	10:08
<a href="#">21-Mar-2018</a>	BLCF	Snohomish County (KPAE)	Chubu Centrair Int'l (Centrair) (NGO / RJGG)	09:47AM PDT	12:09PM JST (+1)	10:21
<a href="#">20-Mar-2018</a>	BLCF	Snohomish County (KPAE)	Chubu Centrair Int'l (Centrair) (NGO / RJGG)	03:06PM PDT	05:54PM JST (+1)	10:47
<a href="#">13-Mar-2018</a>	BLCF	Snohomish County (KPAE)	Chubu Centrair Int'l (Centrair) (NGO / RJGG)	11:43AM PDT	01:20PM JST (+1)	9:36
<a href="#">08-Mar-2018</a>	BLCF	Snohomish County (KPAE)	Chubu Centrair Int'l (Centrair) (NGO / RJGG)	01:42PM PST	05:19PM JST (+1)	10:36
<a href="#">07-Mar-2018</a>	BLCF	Snohomish County (KPAE)	Chubu Centrair Int'l (Centrair) (NGO / RJGG)	09:57AM PST	01:29PM JST (+1)	10:31
<a href="#">05-Mar-2018</a>	BLCF	Snohomish County (KPAE)	Chubu Centrair Int'l (Centrair) (NGO / RJGG)	08:34AM PST	12:43PM JST (+1)	11:08
<a href="#">28-Feb-2018</a>	BLCF	Snohomish County (KPAE)	Chubu Centrair Int'l (Centrair) (NGO / RJGG)	01:02PM PST	04:54PM JST (+1)	10:51
<a href="#">25-Feb-2018</a>	BLCF	Snohomish County (KPAE)	Chubu Centrair Int'l (Centrair) (NGO / RJGG)	07:38PM PST	11:10PM JST (+1)	10:31
<a href="#">23-Feb-2018</a>	BLCF	Snohomish County (KPAE)	Chubu Centrair Int'l (Centrair) (NGO / RJGG)	12:25PM PST	04:06PM JST (+1)	10:40
<a href="#">20-Feb-2018</a>	BLCF	Snohomish County (KPAE)	Chubu Centrair Int'l (Centrair) (NGO / RJGG)	01:22PM PST	04:51PM JST (+1)	10:28
<a href="#">19-Feb-2018</a>	BLCF	Snohomish County (KPAE)	Chubu Centrair Int'l (Centrair) (NGO / RJGG)	01:09PM PST	04:26PM JST (+1)	10:16
<a href="#">12-Feb-2018</a>	BLCF	Snohomish County (KPAE)	Chubu Centrair Int'l (Centrair) (NGO / RJGG)	06:05PM PST	09:35PM JST (+1)	10:29
<a href="#">07-Feb-2018</a>	BLCF	Snohomish County (KPAE)	Chubu Centrair Int'l (Centrair) (NGO / RJGG)	01:45PM PST	04:42PM JST (+1)	9:56
<a href="#">03-Feb-2018</a>	BLCF	Snohomish County (KPAE)	Chubu Centrair Int'l (Centrair) (NGO / RJGG)	02:04PM PST	05:10PM JST (+1)	10:05

History → Atlas Air #4512 → FlightAware

Date	Aircraft	Origin	Destination	Departure	Arrival	Duration
<a href="#">31-Jan-2018</a>	BLCF	Snohomish County (KPAE)	Chubu Centrair Int'l (Centrair) (NGO/RJGG)	02:35PM PST	05:56PM JST (+1)	10:21
<a href="#">26-Jan-2018</a>	BLCF	Snohomish County (KPAE)	Chubu Centrair Int'l (Centrair) (NGO/RJGG)	11:55AM PST	02:41PM JST (+1)	9:45
<a href="#">22-Jan-2018</a>	BLCF	Snohomish County (KPAE)	Chubu Centrair Int'l (Centrair) (NGO/RJGG)	02:30PM PST	06:13PM JST (+1)	10:42
<a href="#">21-Jan-2018</a>	BLCF	Anchorage Intl (PANC)	Chubu Centrair Int'l (Centrair) (NGO/RJGG)	10:25AM AKST	12:10PM JST (+1)	7:44
<a href="#">19-Jan-2018</a>	BLCF	Snohomish County (KPAE)	Chubu Centrair Int'l (Centrair) (NGO/RJGG)	05:41AM PST	08:48AM JST (+1)	10:06
<a href="#">17-Jan-2018</a>	BLCF	Snohomish County (KPAE)	Chubu Centrair Int'l (Centrair) (NGO/RJGG)	08:29AM PST	11:23AM JST (+1)	9:53
<a href="#">12-Jan-2018</a>	BLCF	Snohomish County (KPAE)	Chubu Centrair Int'l (Centrair) (NGO/RJGG)	10:46PM PST	01:51AM JST (+2)	10:04
<a href="#">11-Jan-2018</a>	BLCF	Anchorage Intl (PANC)	Chubu Centrair Int'l (Centrair) (NGO/RJGG)	06:52AM AKST	10:39AM JST (+1)	9:46
<a href="#">11-Jan-2018</a>	BLCF	Snohomish County (KPAE)	Anchorage Intl (PANC)	01:54AM PST	04:44AM AKST	3:49
<a href="#">05-Jan-2018</a>	BLCF	Snohomish County (KPAE)	Chubu Centrair Int'l (Centrair) (NGO/RJGG)	10:07PM PST	12:57AM JST (+2)	9:49

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# GTI4356 Flight Activity History

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### ACTIVITY LOG

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Date	Aircraft	Origin	Destination	Departure	Arrival	Duration
<a href="#">29-Aug-2018</a>	BLCF	Charleston Intl/AFB ( <a href="#">KCHS</a> )	Snohomish County ( <a href="#">KPAE</a> )	12:56AM EDT	02:46AM PDT	4:49
<a href="#">22-Aug-2018</a>	BLCF	Charleston Intl/AFB ( <a href="#">KCHS</a> )	Snohomish County ( <a href="#">KPAE</a> )	01:02AM EDT	03:05AM PDT	5:03
<a href="#">19-Aug-2018</a>	BLCF	Charleston Intl/AFB ( <a href="#">KCHS</a> )	Snohomish County ( <a href="#">KPAE</a> )	11:10PM EDT	01:02AM PDT (+1)	4:51
<a href="#">14-Aug-2018</a>	BLCF	Charleston Intl/AFB ( <a href="#">KCHS</a> )	Snohomish County ( <a href="#">KPAE</a> )	11:11AM EDT	01:02PM PDT	4:50
<a href="#">12-Aug-2018</a>	BLCF	Charleston Intl/AFB ( <a href="#">KCHS</a> )	Snohomish County ( <a href="#">KPAE</a> )	10:08PM EDT	12:04AM PDT (+1)	4:55
<a href="#">03-Aug-2018</a>	BLCF	Charleston Intl/AFB ( <a href="#">KCHS</a> )	Snohomish County ( <a href="#">KPAE</a> )	12:20AM EDT	02:19AM PDT	4:58
<a href="#">30-Jul-2018</a>	BLCF	Charleston Intl/AFB ( <a href="#">KCHS</a> )	Snohomish County ( <a href="#">KPAE</a> )	04:06AM EDT	06:09AM PDT	5:02
<a href="#">25-Jul-2018</a>	BLCF	Charleston Intl/AFB ( <a href="#">KCHS</a> )	Snohomish County ( <a href="#">KPAE</a> )	01:38PM EDT	03:54PM PDT	5:15
<a href="#">17-Jul-2018</a>	BLCF	Charleston Intl/AFB ( <a href="#">KCHS</a> )	Snohomish County ( <a href="#">KPAE</a> )	10:08AM EDT	12:01PM PDT	4:52
<a href="#">11-Jul-2018</a>	BLCF	Charleston Intl/AFB ( <a href="#">KCHS</a> )	Snohomish County ( <a href="#">KPAE</a> )	10:59AM EDT	12:41PM PDT	4:41
<a href="#">29-Jun-2018</a>	BLCF	Charleston Intl/AFB ( <a href="#">KCHS</a> )	Snohomish County ( <a href="#">KPAE</a> )	04:15AM EDT	06:04AM PDT	4:48
<a href="#">27-Jun-2018</a>	BLCF	Charleston Intl/AFB ( <a href="#">KCHS</a> )	Snohomish County ( <a href="#">KPAE</a> )	10:08AM EDT	12:08PM PDT	4:59
<a href="#">25-Jun-2018</a>	BLCF	Charleston Intl/AFB ( <a href="#">KCHS</a> )	Snohomish County ( <a href="#">KPAE</a> )	10:09PM EDT	12:24AM PDT (+1)	5:14
<a href="#">21-Jun-2018</a>	BLCF	Charleston Intl/AFB ( <a href="#">KCHS</a> )	Snohomish County ( <a href="#">KPAE</a> )	01:59PM EDT	03:43PM PDT	4:43
<a href="#">19-Jun-2018</a>	BLCF	Charleston Intl/AFB ( <a href="#">KCHS</a> )	Snohomish County ( <a href="#">KPAE</a> )	10:38AM EDT	12:23PM PDT	4:44
<a href="#">16-Jun-2018</a>	BLCF	Charleston Intl/AFB ( <a href="#">KCHS</a> )	Snohomish County ( <a href="#">KPAE</a> )	12:53PM EDT	02:38PM PDT	4:44
<a href="#">14-Jun-2018</a>	BLCF	Charleston Intl/AFB ( <a href="#">KCHS</a> )	Snohomish County ( <a href="#">KPAE</a> )	05:58AM EDT	08:05AM PDT	5:06
<a href="#">11-Jun-2018</a>	BLCF	Charleston Intl/AFB ( <a href="#">KCHS</a> )	Snohomish County ( <a href="#">KPAE</a> )	01:02PM EDT	03:12PM PDT	5:09
<a href="#">07-Jun-2018</a>	BLCF	Charleston Intl/AFB ( <a href="#">KCHS</a> )	Snohomish County ( <a href="#">KPAE</a> )	02:33AM EDT	04:25AM PDT	4:51
<a href="#">30-May-2018</a>	BLCF	Charleston Intl/AFB ( <a href="#">KCHS</a> )	Snohomish County ( <a href="#">KPAE</a> )	10:09AM EDT	11:57AM PDT	4:47
<a href="#">24-May-2018</a>	BLCF	Charleston Intl/AFB ( <a href="#">KCHS</a> )	Snohomish County ( <a href="#">KPAE</a> )	01:43AM EDT	03:40AM PDT	4:56
<a href="#">20-May-2018</a>	BLCF	Charleston Intl/AFB ( <a href="#">KCHS</a> )	Snohomish County ( <a href="#">KPAE</a> )	10:02PM EDT	11:55PM PDT	4:53
<a href="#">16-May-2018</a>	BLCF	Charleston Intl/AFB ( <a href="#">KCHS</a> )	Snohomish County ( <a href="#">KPAE</a> )	02:02AM EDT	03:38AM PDT	4:35
<a href="#">11-May-2018</a>	BLCF	Charleston Intl/AFB ( <a href="#">KCHS</a> )	Snohomish County ( <a href="#">KPAE</a> )	04:05AM EDT	05:57AM PDT	4:51
<a href="#">07-May-2018</a>	BLCF	Charleston Intl/AFB ( <a href="#">KCHS</a> )	Snohomish County ( <a href="#">KPAE</a> )	10:15AM EDT	12:32PM PDT	5:16
<a href="#">02-May-2018</a>	BLCF	Charleston Intl/AFB ( <a href="#">KCHS</a> )	Snohomish County ( <a href="#">KPAE</a> )	10:57PM EDT	01:32AM PDT (+1)	5:34
<a href="#">28-Apr-2018</a>	BLCF	Charleston Intl/AFB ( <a href="#">KCHS</a> )	Snohomish County ( <a href="#">KPAE</a> )	08:14AM EDT	10:17AM PDT	5:03
<a href="#">23-Apr-2018</a>	BLCF	Charleston Intl/AFB ( <a href="#">KCHS</a> )	Snohomish County ( <a href="#">KPAE</a> )	10:15AM EDT	12:05PM PDT	4:49
<a href="#">19-Apr-2018</a>	BLCF	Charleston Intl/AFB ( <a href="#">KCHS</a> )	Snohomish County ( <a href="#">KPAE</a> )	10:06AM EDT	12:22PM PDT	5:16
<a href="#">16-Apr-2018</a>	BLCF	Charleston Intl/AFB ( <a href="#">KCHS</a> )	Snohomish County ( <a href="#">KPAE</a> )	10:08AM EDT	12:33PM PDT	5:25
<a href="#">11-Apr-2018</a>	BLCF	Charleston Intl/AFB ( <a href="#">KCHS</a> )	Snohomish County ( <a href="#">KPAE</a> )	03:31AM EDT	06:00AM PDT	5:28

Date	Aircraft	Origin	Destination	Departure	Arrival	Duration
<a href="#">06-Apr-2018</a>	BLCF	Charleston Intl/AFB (KCHS)	Snohomish County (KPAE)	02:08PM EDT	04:43PM PDT	5:34
<a href="#">02-Apr-2018</a>	BLCF	Charleston Intl/AFB (KCHS)	Snohomish County (KPAE)	10:13PM EDT	12:32AM PDT (+1)	5:18
<a href="#">28-Mar-2018</a>	BLCF	Charleston Intl/AFB (KCHS)	Snohomish County (KPAE)	10:25AM EDT	12:36PM PDT	5:10
<a href="#">23-Mar-2018</a>	BLCF	Charleston Intl/AFB (KCHS)	Snohomish County (KPAE)	08:56AM EDT	11:23AM PDT	5:26
<a href="#">20-Mar-2018</a>	BLCF	Charleston Intl/AFB (KCHS)	Snohomish County (KPAE)	09:07AM EDT	11:10AM PDT	5:02
<a href="#">16-Mar-2018</a>	BLCF	Charleston Intl/AFB (KCHS)	Snohomish County (KPAE)	09:10AM EDT	11:00AM PDT	4:49
<a href="#">12-Mar-2018</a>	BLCF	Charleston Intl/AFB (KCHS)	Snohomish County (KPAE)	11:23PM EDT	01:29AM PDT (+1)	5:05
<a href="#">08-Mar-2018</a>	BLCF	Charleston Intl/AFB (KCHS)	Snohomish County (KPAE)	10:43AM EST	01:16PM PST	5:32
<a href="#">03-Mar-2018</a>	BLCF	Charleston Intl/AFB (KCHS)	Snohomish County (KPAE)	11:15AM EST	01:27PM PST	5:11
<a href="#">26-Feb-2018</a>	BLCF	Charleston Intl/AFB (KCHS)	Snohomish County (KPAE)	07:17AM EST	09:54AM PST	5:36
<a href="#">23-Feb-2018</a>	BLCF	Charleston Intl/AFB (KCHS)	Snohomish County (KPAE)	02:51AM EST	04:50AM PST	4:58
<a href="#">19-Feb-2018</a>	BLCF	Charleston Intl/AFB (KCHS)	Snohomish County (KPAE)	07:19AM EST	09:25AM PST	5:05
<a href="#">15-Feb-2018</a>	BLCF	Charleston Intl/AFB (KCHS)	Snohomish County (KPAE)	03:54AM EST	06:29AM PST	5:34
<a href="#">10-Feb-2018</a>	BLCF	Charleston Intl/AFB (KCHS)	Snohomish County (KPAE)	10:16AM EST	12:35PM PST	5:18
<a href="#">07-Feb-2018</a>	BLCF	Charleston Intl/AFB (KCHS)	Snohomish County (KPAE)	05:10AM EST	07:45AM PST	5:35
<a href="#">07-Feb-2018</a>	BLCF	Charleston Intl/AFB (KCHS)	Snohomish County (KPAE)	12:35AM EST	03:05AM PST	5:30
<a href="#">03-Feb-2018</a>	BLCF	Charleston Intl/AFB (KCHS)	Snohomish County (KPAE)	03:54AM EST	06:37AM PST	5:42
<a href="#">30-Jan-2018</a>	BLCF	Charleston Intl/AFB (KCHS)	Snohomish County (KPAE)	04:13AM EST	06:56AM PST	5:42
<a href="#">26-Jan-2018</a>	BLCF	Charleston Intl/AFB (KCHS)	Snohomish County (KPAE)	01:57AM EST	04:04AM PST	5:07
<a href="#">19-Jan-2018</a>	BLCF	Charleston Intl/AFB (KCHS)	Snohomish County (KPAE)	08:03AM EST	10:20AM PST	5:16
<a href="#">18-Jan-2018</a>	BLCF	Charleston Intl/AFB (KCHS)	Snohomish County (KPAE)	08:01AM EST	10:22AM PST	5:20
<a href="#">14-Jan-2018</a>	BLCF	Charleston Intl/AFB (KCHS)	Snohomish County (KPAE)	04:13AM EST	07:04AM PST	5:50
<a href="#">10-Jan-2018</a>	BLCF	Charleston Intl/AFB (KCHS)	Snohomish County (KPAE)	05:01AM EST	07:09AM PST	5:07
<a href="#">07-Jan-2018</a>	BLCF	Charleston Intl/AFB (KCHS)	Snohomish County (KPAE)	04:23PM EST	06:49PM PST	5:25

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Date	Aircraft	Origin	Destination	Departure	Arrival	Duration
<a href="#">27-Aug-2018</a>	BLCF	Charleston Intl/AFB (KCHS)	Snohomish County (KPAE)	02:29AM EDT	04:24AM PDT	4:54
<a href="#">23-Aug-2018</a>	BLCF	Charleston Intl/AFB (KCHS)	Snohomish County (KPAE)	12:38AM EDT	02:41AM PDT	5:02
<a href="#">15-Aug-2018</a>	BLCF	Charleston Intl/AFB (KCHS)	Snohomish County (KPAE)	06:42AM EDT	08:37AM PDT	4:55
<a href="#">08-Aug-2018</a>	BLCF	Charleston Intl/AFB (KCHS)	Snohomish County (KPAE)	08:44AM EDT	10:37AM PDT	4:52
<a href="#">07-Aug-2018</a>	BLCF	Charleston Intl/AFB (KCHS)	Snohomish County (KPAE)	09:53AM EDT	11:44AM PDT	4:50
<a href="#">03-Aug-2018</a>	BLCF	Charleston Intl/AFB (KCHS)	Snohomish County (KPAE)	07:54PM EDT	09:55PM PDT	5:00
<a href="#">29-Jul-2018</a>	BLCF	Charleston Intl/AFB (KCHS)	Snohomish County (KPAE)	09:44PM EDT	11:43PM PDT	4:58
<a href="#">23-Jul-2018</a>	BLCF	Charleston Intl/AFB (KCHS)	Snohomish County (KPAE)	07:53AM EDT	10:04AM PDT	5:10
<a href="#">18-Jul-2018</a>	BLCF	Charleston Intl/AFB (KCHS)	Snohomish County (KPAE)	09:28AM EDT	11:40AM PDT	5:11
<a href="#">17-Jul-2018</a>	BLCF	Charleston Intl/AFB (KCHS)	Snohomish County (KPAE)	08:00AM EDT	10:00AM PDT	4:59
<a href="#">14-Jul-2018</a>	BLCF	Charleston Intl/AFB (KCHS)	Snohomish County (KPAE)	09:50AM EDT	11:45AM PDT	4:55
<a href="#">28-Jun-2018</a>	BLCF	Charleston Intl/AFB (KCHS)	Snohomish County (KPAE)	09:09PM EDT	10:57PM PDT	4:47
<a href="#">26-Jun-2018</a>	BLCF	Charleston Intl/AFB (KCHS)	Snohomish County (KPAE)	07:42PM EDT	09:50PM PDT	5:07
<a href="#">21-Jun-2018</a>	BLCF	Charleston Intl/AFB (KCHS)	Snohomish County (KPAE)	07:35PM EDT	09:44PM PDT	5:08
<a href="#">19-Jun-2018</a>	BLCF	Charleston Intl/AFB (KCHS)	Snohomish County (KPAE)	07:55PM EDT	10:28PM PDT	5:32
<a href="#">15-Jun-2018</a>	BLCF	Charleston Intl/AFB (KCHS)	Snohomish County (KPAE)	01:50AM EDT	03:46AM PDT	4:55
<a href="#">08-Jun-2018</a>	BLCF	Charleston Intl/AFB (KCHS)	Snohomish County (KPAE)	05:18PM EDT	07:17PM PDT	4:58
<a href="#">05-Jun-2018</a>	BLCF	Charleston Intl/AFB (KCHS)	Snohomish County (KPAE)	08:40PM EDT	10:44PM PDT	5:03
<a href="#">24-May-2018</a>	BLCF	Charleston Intl/AFB (KCHS)	Snohomish County (KPAE)	08:54PM EDT	10:47PM PDT	4:52
<a href="#">18-May-2018</a>	BLCF	Charleston Intl/AFB (KCHS)	Snohomish County (KPAE)	04:09PM EDT	05:46PM PDT	4:36
<a href="#">15-May-2018</a>	BLCF	Charleston Intl/AFB (KCHS)	Snohomish County (KPAE)	10:03PM EDT	11:45PM PDT	4:42
<a href="#">10-May-2018</a>	BLCF	Charleston Intl/AFB (KCHS)	Snohomish County (KPAE)	04:41AM EDT	06:58AM PDT	5:16
<a href="#">03-May-2018</a>	BLCF	Charleston Intl/AFB (KCHS)	Snohomish County (KPAE)	12:07AM EDT	02:18AM PDT	5:11
<a href="#">29-Apr-2018</a>	BLCF	Charleston Intl/AFB (KCHS)	Snohomish County (KPAE)	02:10PM EDT	04:16PM PDT	5:05
<a href="#">24-Apr-2018</a>	BLCF	Charleston Intl/AFB (KCHS)	Snohomish County (KPAE)	09:58AM EDT	11:53AM PDT	4:54
<a href="#">19-Apr-2018</a>	BLCF	Charleston Intl/AFB (KCHS)	Snohomish County (KPAE)	09:40PM EDT	11:54PM PDT	5:13
<a href="#">16-Apr-2018</a>	BLCF	Charleston Intl/AFB (KCHS)	Snohomish County (KPAE)	09:40PM EDT	12:11AM PDT (+1)	5:30
<a href="#">10-Apr-2018</a>	BLCF	Charleston Intl/AFB (KCHS)	Snohomish County (KPAE)	09:58PM EDT	12:33AM PDT (+1)	5:34
<a href="#">05-Apr-2018</a>	BLCF	Charleston Intl/AFB (KCHS)	Snohomish County (KPAE)	09:50PM EDT	12:26AM PDT (+1)	5:35
<a href="#">03-Apr-2018</a>	BLCF	Charleston Intl/AFB (KCHS)	Snohomish County (KPAE)	07:44AM EDT	10:11AM PDT	5:26
<a href="#">28-Mar-2018</a>	BLCF	Charleston Intl/AFB (KCHS)	Snohomish County (KPAE)	09:30PM EDT	11:39PM PDT	5:08

Date	Aircraft	Origin	Destination	Departure	Arrival	Duration
<a href="#">23-Mar-2018</a>	BLCF	Charleston Intl/AFB ( <a href="#">KCHS</a> )	Snohomish County ( <a href="#">KPAE</a> )	06:41PM EDT	09:07PM PDT	5:25
<a href="#">16-Mar-2018</a>	BLCF	Charleston Intl/AFB ( <a href="#">KCHS</a> )	Snohomish County ( <a href="#">KPAE</a> )	11:28PM EDT	01:28AM PDT (+1)	4:59
<a href="#">12-Mar-2018</a>	BLCF	Charleston Intl/AFB ( <a href="#">KCHS</a> )	Snohomish County ( <a href="#">KPAE</a> )	09:38PM EDT	11:42PM PDT	5:03
<a href="#">08-Mar-2018</a>	BLCF	Charleston Intl/AFB ( <a href="#">KCHS</a> )	Snohomish County ( <a href="#">KPAE</a> )	12:22PM EST	02:46PM PST	5:23
<a href="#">02-Mar-2018</a>	BLCF	Charleston Intl/AFB ( <a href="#">KCHS</a> )	Snohomish County ( <a href="#">KPAE</a> )	06:33PM EST	09:00PM PST	5:26
<a href="#">27-Feb-2018</a>	BLCF	Charleston Intl/AFB ( <a href="#">KCHS</a> )	Snohomish County ( <a href="#">KPAE</a> )	09:01PM EST	11:38PM PST	5:37
<a href="#">22-Feb-2018</a>	BLCF	Charleston Intl/AFB ( <a href="#">KCHS</a> )	Snohomish County ( <a href="#">KPAE</a> )	09:08PM EST	11:11PM PST	5:02
<a href="#">20-Feb-2018</a>	BLCF	Charleston Intl/AFB ( <a href="#">KCHS</a> )	Snohomish County ( <a href="#">KPAE</a> )	12:59AM EST	02:57AM PST	4:57
<a href="#">14-Feb-2018</a>	BLCF	Charleston Intl/AFB ( <a href="#">KCHS</a> )	Snohomish County ( <a href="#">KPAE</a> )	08:47PM EST	11:20PM PST	5:32
<a href="#">10-Feb-2018</a>	BLCF	Charleston Intl/AFB ( <a href="#">KCHS</a> )	Snohomish County ( <a href="#">KPAE</a> )	06:03AM EST	08:23AM PST	5:20
<a href="#">03-Feb-2018</a>	BLCF	Charleston Intl/AFB ( <a href="#">KCHS</a> )	Snohomish County ( <a href="#">KPAE</a> )	07:45AM EST	10:25AM PST	5:39
<a href="#">25-Jan-2018</a>	BLCF	Charleston Intl/AFB ( <a href="#">KCHS</a> )	Snohomish County ( <a href="#">KPAE</a> )	12:11PM EST	02:19PM PST	5:07
<a href="#">21-Jan-2018</a>	BLCF	Charleston Intl/AFB ( <a href="#">KCHS</a> )	Snohomish County ( <a href="#">KPAE</a> )	09:58PM EST	11:51PM PST	4:52
<a href="#">17-Jan-2018</a>	BLCF	Charleston Intl/AFB ( <a href="#">KCHS</a> )	Snohomish County ( <a href="#">KPAE</a> )	08:07PM EST	10:23PM PST	5:15
<a href="#">15-Jan-2018</a>	BLCF	Charleston Intl/AFB ( <a href="#">KCHS</a> )	Snohomish County ( <a href="#">KPAE</a> )	12:56AM EST	03:00AM PST	5:04
<a href="#">10-Jan-2018</a>	BLCF	Charleston Intl/AFB ( <a href="#">KCHS</a> )	Snohomish County ( <a href="#">KPAE</a> )	08:45PM EST	11:03PM PST	5:17
<a href="#">02-Jan-2018</a>	BLCF	Charleston Intl/AFB ( <a href="#">KCHS</a> )	Snohomish County ( <a href="#">KPAE</a> )	08:45PM EST	10:59PM PST	5:13

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## GTI4346 Flight Activity History

GTI4346

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#### ACTIVITY LOG

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Date	Aircraft	Origin	Destination	Departure	Arrival	Duration
<a href="#">19-Aug-2018</a>	BLCF	Mc Connell Afb ( <a href="#">KLAB</a> )	Snohomish County ( <a href="#">KPAE</a> )	10:32PM CDT	11:44PM PDT	3:11
<a href="#">26-Jul-2018</a>	BLCF	Mc Connell Afb ( <a href="#">KLAB</a> )	Snohomish County ( <a href="#">KPAE</a> )	01:46PM CDT	03:04PM PDT	3:17
<a href="#">10-Jul-2018</a>	BLCF	Mc Connell Afb ( <a href="#">KLAB</a> )	Snohomish County ( <a href="#">KPAE</a> )	05:39AM CDT	06:35AM PDT	2:56
<a href="#">22-Jun-2018</a>	BLCF	Mc Connell Afb ( <a href="#">KLAB</a> )	Snohomish County ( <a href="#">KPAE</a> )	09:20AM CDT	10:34AM PDT	3:13

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## GTI4151 Flight Activity History

GTI4151

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#### ACTIVITY LOG

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Date	Aircraft	Origin	Destination	Departure	Arrival	Duration
<a href="#">30-Aug-2018</a>	BLCF	Chubu Centrair Int'l (Centrair) (NGO / RJGG)	Snohomish County (KPAE)	03:16PM JST	07:40AM PDT	8:23
<a href="#">22-Aug-2018</a>	BLCF	Near Chita, Aichi	Snohomish County (KPAE)	05:10PM JST	09:57AM PDT	8:46
<a href="#">22-Aug-2018</a>	BLCF	Near Chita, Aichi	Victoria Int'l (CYYJ)	05:10PM JST		Diverted
<a href="#">21-Aug-2018</a>	B744	Chubu Centrair Int'l (Centrair) (NGO / RJGG)	Snohomish County (KPAE)	01:34PM JST	06:23AM PDT	8:48
<a href="#">17-Aug-2018</a>	BLCF	Anchorage Intl (PANC)	Snohomish County (KPAE)	06:28PM AKDT	10:04PM PDT	2:35
<a href="#">18-Aug-2018</a>	BLCF	Chubu Centrair Int'l (Centrair) (NGO / RJGG)	Anchorage Intl (PANC)	02:27AM JST	04:08PM AKDT (-1)	6:40
<a href="#">13-Aug-2018</a>	BLCF	Near Chita, Aichi	Snohomish County (KPAE)	08:05PM JST	12:52PM PDT	8:47
<a href="#">13-Aug-2018</a>	BLCF	Near Chita, Aichi	Victoria Int'l (CYYJ)	08:05PM JST		Diverted
<a href="#">08-Aug-2018</a>	BLCF	Chubu Centrair Int'l (Centrair) (NGO / RJGG)	Snohomish County (KPAE)	11:17PM JST	04:05PM PDT	8:47
<a href="#">02-Aug-2018</a>	BLCF	Anchorage Intl (PANC)	Snohomish County (KPAE)	09:38PM AKDT	01:26AM PDT (+1)	2:47
<a href="#">03-Aug-2018</a>	BLCF	Chubu Centrair Int'l (Centrair) (NGO / RJGG)	Anchorage Intl (PANC)	04:33AM JST	05:49PM AKDT (-1)	6:15
<a href="#">31-Jul-2018</a>	BLCF	Anchorage Intl (PANC)	Snohomish County (KPAE)	08:02AM AKDT	12:00PM PDT	2:57
<a href="#">31-Jul-2018</a>	BLCF	Chubu Centrair Int'l (Centrair) (NGO / RJGG)	Anchorage Intl (PANC)	04:14PM JST	05:55AM AKDT	6:40
<a href="#">31-Jul-2018</a>	BLCF	Chubu Centrair Int'l (Centrair) (NGO / RJGG)	Snohomish County (KPAE)	04:14PM JST		Diverted
<a href="#">26-Jul-2018</a>	BLCF	Anchorage Intl (PANC)	Snohomish County (KPAE)	06:54PM AKDT	10:53PM PDT	2:59
<a href="#">27-Jul-2018</a>	BLCF	Chubu Centrair Int'l (Centrair) (NGO / RJGG)	Anchorage Intl (PANC)	02:57AM JST	04:49PM AKDT (-1)	6:51
<a href="#">19-Jul-2018</a>	BLCF	Near Chita, Aichi	Snohomish County (KPAE)	09:05PM JST	02:04PM PDT	8:59
<a href="#">19-Jul-2018</a>	BLCF	Near Chita, Aichi	Victoria Int'l (CYYJ)	09:05PM JST		Diverted
<a href="#">13-Jul-2018</a>	BLCF	Near Chita, Aichi	Snohomish County (KPAE)	06:22PM JST	11:02AM PDT	8:39
<a href="#">13-Jul-2018</a>	BLCF	Near Chita, Aichi	Victoria Int'l (CYYJ)	06:22PM JST		Diverted

Date	Aircraft	Origin	Destination	Departure	Arrival	Duration
<a href="#">12-Jul-2018</a>	BLCF	Near Chita, Aichi	Snohomish County (KPAE)	09:19PM JST	02:05PM PDT	8:46
<a href="#">11-Jul-2018</a>	BLCF	Near Chita, Aichi	Snohomish County (KPAE)	04:10PM JST	08:50AM PDT	8:39
<a href="#">28-Jun-2018</a>	BLCF	Near Chita, Aichi	Snohomish County (KPAE)	06:05PM JST	10:23AM PDT	8:18
<a href="#">28-Jun-2018</a>	BLCF	Near Chita, Aichi	Victoria Int'l (CYYJ)	06:05PM JST		Diverted
<a href="#">25-Jun-2018</a>	BLCF	Near Chita, Aichi	Snohomish County (KPAE)	04:23PM JST	08:45AM PDT	8:22
<a href="#">25-Jun-2018</a>	BLCF	Near Chita, Aichi	Victoria Int'l (CYYJ)	04:23PM JST		Diverted
<a href="#">18-Jun-2018</a>	BLCF	Near Chita, Aichi	Snohomish County (KPAE)	04:12PM JST	09:01AM PDT	8:49
<a href="#">18-Jun-2018</a>	BLCF	Near Chita, Aichi	Victoria Int'l (CYYJ)	04:12PM JST		Diverted
<a href="#">11-Jun-2018</a>	BLCF	Near Chita, Aichi	Snohomish County (KPAE)	05:56PM JST	10:38AM PDT	8:41
<a href="#">11-Jun-2018</a>	BLCF	Near Chita, Aichi	Victoria Int'l (CYYJ)	05:56PM JST		Diverted
<a href="#">05-Jun-2018</a>	BLCF	Seattle-Tacoma Intl (KSEA)	Snohomish County (KPAE)	02:09AM PDT	02:24AM PDT	0:14
<a href="#">05-Jun-2018</a>	BLCF	Chubu Centrair Int'l (Centrair) (NGO / RJGG)	Seattle-Tacoma Intl (KSEA)	09:34AM JST	10:54PM PDT (-1)	5:20
<a href="#">05-Jun-2018</a>	B744	Near Chita, Aichi	Near Omitama, Ibaraki	<i>First seen</i> 06:14AM JST	<i>Last seen</i> 10:07PM UTC (-1)	0:52
<a href="#">30-May-2018</a>	BLCF	Near Chita, Aichi	Snohomish County (KPAE)	04:12PM JST	08:36AM PDT	8:23
<a href="#">30-May-2018</a>	BLCF	Near Chita, Aichi	Victoria Int'l (CYYJ)	04:12PM JST		Diverted
<a href="#">29-May-2018</a>	BLCF	Anchorage Intl (PANC)	Snohomish County (KPAE)	04:55AM AKDT	08:35AM PDT	2:39
<a href="#">29-May-2018</a>	BLCF	Chubu Centrair Int'l (Centrair) (NGO / RJGG)	Anchorage Intl (PANC)	01:12PM JST	02:49AM AKDT	6:36
<a href="#">23-May-2018</a>	BLCF	Near Chita, Aichi	Snohomish County (KPAE)	08:12PM JST	12:36PM PDT	8:24
<a href="#">23-May-2018</a>	BLCF	Near Chita, Aichi	Victoria Int'l (CYYJ)	08:12PM JST		Diverted
<a href="#">17-May-2018</a>	BLCF	Near Chita, Aichi	Snohomish County (KPAE)	09:28PM JST	02:37PM PDT	9:08
<a href="#">17-May-2018</a>	BLCF	Near Chita, Aichi	Victoria Int'l (CYYJ)	09:28PM JST		Diverted
<a href="#">14-May-2018</a>	BLCF	Near Chita, Aichi	Snohomish County (KPAE)	01:00PM JST	05:42AM PDT	8:42
<a href="#">14-May-2018</a>	BLCF	Near Chita, Aichi	Victoria Int'l (CYYJ)	01:00PM JST		Diverted
<a href="#">09-May-2018</a>	BLCF	Near Chita, Aichi	Snohomish County (KPAE)	03:54PM JST	06:56AM PDT	7:01
<a href="#">09-May-2018</a>	BLCF	Near Chita, Aichi	Victoria Int'l (CYYJ)	03:54PM JST		Diverted
<a href="#">04-May-2018</a>	BLCF	Chubu Centrair Int'l (Centrair) (NGO / RJGG)	Snohomish County (KPAE)	02:09PM JST	06:40AM PDT	8:30
<a href="#">01-May-2018</a>	BLCF	Chubu Centrair Int'l (Centrair) (NGO / RJGG)	Snohomish County (KPAE)	01:12PM JST	05:42AM PDT	8:29
<a href="#">26-Apr-2018</a>	BLCF	Chubu Centrair Int'l (Centrair) (NGO / RJGG)	Snohomish County (KPAE)	04:13PM JST	08:54AM PDT	8:40
<a href="#">20-Apr-2018</a>	BLCF	Near Chita, Aichi	Snohomish County (KPAE)	07:15PM JST	11:47AM PDT	8:31
<a href="#">20-Apr-2018</a>	BLCF	Near Chita, Aichi	Victoria Int'l (CYYJ)	07:15PM JST		Diverted
<a href="#">19-Apr-2018</a>	BLCF	Near Chita, Aichi	Snohomish County (KPAE)	03:30PM JST	07:51AM PDT	8:20
<a href="#">19-Apr-2018</a>	BLCF	Near Chita, Aichi	Victoria Int'l (CYYJ)	03:30PM JST		Diverted
<a href="#">12-Apr-2018</a>	BLCF	Near Chita, Aichi	Snohomish County (KPAE)	03:07PM JST	07:39AM PDT	8:31

Date	Aircraft	Origin	Destination	Departure	Arrival	Duration
<a href="#">12-Apr-2018</a>	BLCF	Near Chita, Aichi	Victoria Int'l (CYYJ)	03:07PM JST		Diverted
<a href="#">09-Apr-2018</a>	BLCF	Near Chita, Aichi	Snohomish County (KPAE)	01:10PM JST	05:16AM PDT	8:05
<a href="#">09-Apr-2018</a>	BLCF	Near Chita, Aichi	Victoria Int'l (CYYJ)	01:10PM JST		Diverted
<a href="#">04-Apr-2018</a>	B744	Chubu Centrair Int'l (Centrair) (NGO / RJGG)	Snohomish County (KPAE)	11:00AM JST	03:51AM PDT	8:51
<a href="#">27-Mar-2018</a>	BLCF	Near Chita, Aichi	Snohomish County (KPAE)	04:15PM JST	08:57AM PDT	8:42
<a href="#">27-Mar-2018</a>	BLCF	Near Chita, Aichi	Victoria Int'l (CYYJ)	04:15PM JST		Diverted
<a href="#">23-Mar-2018</a>	B744	Chubu Centrair Int'l (Centrair) (NGO / RJGG)	Snohomish County (KPAE)	11:10PM JST	07:38AM PDT	0:27
<a href="#">23-Mar-2018</a>	BLCF	Chubu Centrair Int'l (Centrair) (NGO / RJGG)	Snohomish County (KPAE)	03:07PM JST	11:54PM PDT (-1) (?)	0:46
<a href="#">21-Mar-2018</a>	BLCF	Near Chita, Aichi	Snohomish County (KPAE)	09:48PM JST	02:17PM PDT	8:29
<a href="#">21-Mar-2018</a>	BLCF	Near Chita, Aichi	Victoria Int'l (CYYJ)	09:48PM JST		Diverted
<a href="#">14-Mar-2018</a>	BLCF	Chubu Centrair Int'l (Centrair) (NGO / RJGG)	Snohomish County (KPAE)	05:20PM JST	10:02AM PDT	8:42
<a href="#">10-Mar-2018</a>	BLCF	Chubu Centrair Int'l (Centrair) (NGO / RJGG)	Snohomish County (KPAE)	02:55PM JST	06:42AM PST	8:46
<a href="#">08-Mar-2018</a>	BLCF	Chubu Centrair Int'l (Centrair) (NGO / RJGG)	Snohomish County (KPAE)	04:49PM JST	08:07AM PST	8:18
<a href="#">07-Mar-2018</a>	BLCF	Anchorage Intl (PANC)	Snohomish County (KPAE)	12:19AM AKST	04:04AM PST	2:44
<a href="#">07-Mar-2018</a>	BLCF	Chubu Centrair Int'l (Centrair) (NGO / RJGG)	Anchorage Intl (PANC)	03:03AM JST	02:54PM AKST (-1)	5:50
<a href="#">27-Feb-2018</a>	BLCF	Chubu Centrair Int'l (Centrair) (NGO / RJGG)	Snohomish County (KPAE)	02:27AM JST	05:35PM PST (-1)	8:08
<a href="#">21-Feb-2018</a>	BLCF	Chubu Centrair Int'l (Centrair) (NGO / RJGG)	Snohomish County (KPAE)	08:03PM JST	11:36AM PST	8:33
<a href="#">19-Feb-2018</a>	BLCF	Anchorage Intl (PANC)	Snohomish County (KPAE)	12:30AM AKST	04:12AM PST	2:41
<a href="#">19-Feb-2018</a>	BLCF	Chubu Centrair Int'l (Centrair) (NGO / RJGG)	Anchorage Intl (PANC)	08:04AM JST	08:33PM AKST (-1)	6:28
<a href="#">13-Feb-2018</a>	BLCF	Near Chita, Aichi	Snohomish County (KPAE)	09:16PM JST	12:31PM PST	8:15
<a href="#">13-Feb-2018</a>	BLCF	Near Chita, Aichi	Victoria Int'l (CYYJ)	09:16PM JST		Diverted
<a href="#">08-Feb-2018</a>	BLCF	Near Chita, Aichi	Snohomish County (KPAE)	08:12PM JST	11:38AM PST	8:26
<a href="#">08-Feb-2018</a>	BLCF	Near Chita, Aichi	Victoria Int'l (CYYJ)	08:12PM JST		Diverted
<a href="#">05-Feb-2018</a>	BLCF	Near Chita, Aichi	Snohomish County (KPAE)	04:03PM JST	07:36AM PST	8:32
<a href="#">05-Feb-2018</a>	BLCF	Near Chita, Aichi	Victoria Int'l (CYYJ)	04:03PM JST		Diverted
<a href="#">01-Feb-2018</a>	BLCF	Anchorage Intl (PANC)	Snohomish County (KPAE)	02:08PM AKST	05:53PM PST	2:45
<a href="#">01-Feb-2018</a>	BLCF	Near Chita, Aichi	Anchorage Intl (PANC)	09:15PM JST	10:15AM AKST	6:59
<a href="#">01-Feb-2018</a>	BLCF	Near Chita, Aichi	Victoria Int'l (CYYJ)	09:15PM JST		Diverted
<a href="#">27-Jan-2018</a>	BLCF	Near Chita, Aichi	Snohomish County (KPAE)	12:36AM JST	04:22PM PST (-1)	8:46
<a href="#">27-Jan-2018</a>	BLCF	Near Chita, Aichi	Victoria Int'l (CYYJ)	12:36AM JST		Diverted
<a href="#">23-Jan-2018</a>	BLCF	Near Chita, Aichi	Snohomish County (KPAE)	09:14PM JST	12:44PM PST	8:29
<a href="#">23-Jan-2018</a>	BLCF	Near Chita, Aichi	Victoria Int'l (CYYJ)	09:14PM JST		Diverted
<a href="#">22-Jan-2018</a>	BLCF	Near Chita, Aichi	Snohomish County (KPAE)	03:56PM JST	07:33AM PST	8:37

Date	Aircraft	Origin	Destination	Departure	Arrival	Duration
<a href="#">22-Jan-2018</a>	BLCF	Near Chita, Aichi	Victoria Int'l (CYYJ)	03:56PM JST		Diverted
<a href="#">14-Jan-2018</a>	BLCF	Anchorage Int'l (PANC)	Snohomish County (KPAE)	03:29AM AKST	07:42AM PST	3:13
<a href="#">14-Jan-2018</a>	BLCF	Chubu Centrair Int'l (Centrair) (NGO / RJGG)	Anchorage Int'l (PANC)	10:15AM JST	11:07PM AKST (-1)	6:51
<a href="#">12-Jan-2018</a>	BLCF	Anchorage Int'l (PANC)	Snohomish County (KPAE)	04:23AM AKST	08:08AM PST	2:45
<a href="#">12-Jan-2018</a>	BLCF	Chubu Centrair Int'l (Centrair) (NGO / RJGG)	Anchorage Int'l (PANC)	01:50PM JST	02:24AM AKST	6:33
<a href="#">07-Jan-2018</a>	BLCF	Anchorage Int'l (PANC)	Snohomish County (KPAE)	10:37PM AKST	02:32AM PST (+1)	2:55
<a href="#">08-Jan-2018</a>	BLCF	Chubu Centrair Int'l (Centrair) (NGO / RJGG)	Anchorage Int'l (PANC)	07:45AM JST	08:27PM AKST (-1)	6:41

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**From:** Sonja Brisson <[sonjabrisson@gmail.com](mailto:sonjabrisson@gmail.com)>  
**Sent:** Wednesday, October 31, 2018 2:35 PM  
**To:** Paine Field <[painefield@esassoc.com](mailto:painefield@esassoc.com)>  
**Subject:** Potential noise and wildlife disturbance

Dear Administrators:

I live and work at 6625 Fisher Road in Edmonds, WA and am concerned about the potential noise and wildlife impacts once flights begin in the new year/2019. I understand there will be up to 48 flights per day. If this is the case, my husband and I hope that flight paths can be altered so that it doesn't consistently go over our neighborhood.

Please let us know what the flight schedules and paths are (which I can't find online) and if our concerns are founded in reality. Our quiet and peaceful neighborhood, which is also home to abundant wildlife including owls and deer, needs to be preserved.

Sincerely,

Sonja Brisson

--

**Sonja Brisson**

**Content Strategy | Copy**

**206-225-0911**

[sonja@sonjabrisson.com](mailto:sonja@sonjabrisson.com)

[sonjabrisson@gmail.com](mailto:sonjabrisson@gmail.com)

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## Response to Comment

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Dear Sonja Brisson:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### **General Responses**

2-1: Why Can't the County Limit or Restrict Operations?

3-2: Use of the DNL Metric

3-5: Where are Flight Tracks Shown?

6-5: What is the Impact on Wildlife?

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**From:** Oksana Lysenko <[oksana3791@msn.com](mailto:oksana3791@msn.com)>  
**Sent:** Wednesday, October 31, 2018 2:43 PM  
**To:** Paine Field <[painefield@esassoc.com](mailto:painefield@esassoc.com)>  
**Subject:** flight path, noise - Paine Field

Hello,

I have strong concerns about the excessive noise coming from the planes going to and from the Paine Field airport, on all days of the week at various times. Most planes fly too low to the ground and are very loud when pass over my house in Picnic Point neighborhood at 14229 57th ave west Edmonds WA 98026. Please address this problem.

Thank you

Appreciate your help

Oksana Lysenko

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## Response to Comment

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Dear Oksana Lysenko:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### **General Responses**

2-4: Aircraft Currently Fly Very Low and Close to Houses

3-1: Existing Aircraft Noise Concerns

3-6: What Are the Existing and Future Noise Impacts?

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**ACE Internet Services, Inc**

PO Box 2667  
 Lynnwood, WA 98036  
 Phone (206) 551-7000  
 Fax (425) 307-3577  
 www.ace2100.com

james@ace2100.com



October 31, 2018

TO: Environmental Science Associates / Public Comment Period  
[PaineField@esassoc.com](mailto:PaineField@esassoc.com)

RE: Flights out of Paine Field / Everett area

Hello,

I am a small business owner, President of my company, who moved my headquarters to Lynnwood in 2017. I have been in business for over 20 years and am well established. I have been very interested in the new flights to Paine Field that are on schedule to be delivered in 2019 now. I am very excited at the prospects of new business activity and the positive changes the new public air services will bring for the whole of the Everett / Lynnwood area.

I travel every week back and forth from San Diego to SeaTac and this process is grueling and cumbersome. To reroute from SeaTac airport after landing and get the 40+ miles from the airport back to my home in Everett in time to sleep is taking a big toll on me. Sometimes it takes 45 minutes...sometimes it takes 2 hours ONE WAY. In fact, I bought a new home in July 2018 expecting and hoping the direct flights to California would be coming soon. Once these flights start, it will save me at least 4-8 hours every week in immediate travel time reduction. Additionally, it will add more time to develop my business in the local area and better support our area businesses that need high quality, cost effective computer support services. Hopefully it will increase my bottom line and I will be paying even more in B&O taxes to the area! I am happily pro-growth!

There are countless people I talk to every day I travel that, like me, would benefit greatly from the new flights.

For those with environmental concerns I wonder just how many tons of pollution will come off the road from people not driving so much stuck in peak hour gridlock, not idling in rush hour traffic and help make Puget Sound an even more attractive, clean green place to live?

I am also a huge property rights advocate and appreciate the concerns of property owners as I am now live less than a few miles from the airport. Property owners need assurances that all efforts to keep the community they own land or buildings in is a vibrant, safe and high-quality place to live. But I also feel the net effects of new air service in the area will greatly and positively transform the area into a wanted destination.

Everett is extremely close to the great outdoor Washington experiences of the San Juan Islands, Cascade mountains, ski resorts, Lynnwood Convention Center, and even the tech hubs of Redmond, Kirkland and Seattle as an alternative path to bring in new activity or even reroute existing activity through our area.

It will be exciting to see the area transform!

Down in San Diego where I am a little less than half of every week, the roads are terrible and just don't seem to get upgraded. Pot holes are a problem that don't get fixed. However, up in the Everett and Lynnwood area near my new 2018 home I have seen new roads finished being paved, new offramps from the freeways developed AND finished...and a lot of thought put into how we are going to handle growth. It is very impressive and welcomed. I even had to use the local ER recently that is very close to the airport for my son and was happily surprised at the high quality and easy access.

I think we are poised for great things and want to encourage public officials to keep this project on track as I see it will likely benefit many people in the area.

Please keep this project on track for me, my business, this community and all the future people who will use the area. I look forward to many great days ahead and hope for a successful launch on this bold and needed venture.

Best Regards and thank you for reading my concerns and passions for that area,

**P95**

Sincerely,

James Hoff  
President  
Ace Internet Service, Inc.



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## **Response to Comment**

---

Dear James Hoff:

Thank you for your comments regarding the Proposed Action at Paine Field.

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---

From: Susan Schlosser <[susan.schlosser11@frontier.com](mailto:susan.schlosser11@frontier.com)>  
Sent: Wednesday, October 31, 2018 3:37 PM  
To: Paine Field <[painefield@esassoc.com](mailto:painefield@esassoc.com)>  
Subject: Expanding Paine Field

Gentlemen, we have been neighbors since 1980, before Alderwood Mall and Harbour Pointe expansion, before the 525 correction. The traffic through our neighborhoods has expanded exponentially. We live north of Seattle to avoid this noise and congestion. Please keep our neighborhood safe from further expansion. Thank you, Susan

"Expect the best."

---

## Response to Comment

---

Dear Susan Schlosser:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### **General Responses**

3-6: What Are the Existing and Future Noise Impacts?

5-1: Existing and Future Traffic

5-2: Traffic Analysis

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**From:** Annie Peterson <[sevenskies@comcast.net](mailto:sevenskies@comcast.net)>  
**Sent:** Wednesday, October 31, 2018 4:28 PM  
**To:** Paine Field <[painefield@esassoc.com](mailto:painefield@esassoc.com)>  
**Subject:** I support flying out of Paine Field...

Just last week, I spent a long weekend with my daughter's family outside Sacramento. My SeaTac flight left at 11:40am, and I left my Lake Stevens home before 9 am. Even after "rush hour," it took over an hour to get to Bellevue even in the express lanes and another 1/2 hour plus to get to the airport. Construction at Sea Tac meant a delay in take-off and a late arrival in Sacramento.

There is no time of day that it is possible to get to Sea Tac anymore in anything close to a timely manner. My trip home meant landing at 9:30ish pm, and the same trip home without traffic was 45 minutes after the delay getting to the gate for Sea Tac construction.

The opening of Paine Field will be a wonderful addition to travel options for all of us north of Seattle. In 2017, Snohomish County was one of the fastest growing counties in the country (<https://www.seattletimes.com/seattle-news/data/new-residents-pour-in-pierce-snohomish-counties-top-the-nation/>) and that is likely continuing. It is imperative that Snohomish County have Paine Field open for commercial operations not only for us who fly often but for business opportunities for our fast growing and expanding area.

Thanks for your time.

Ann-Gale Peterson

427 101st Avenue NE

Lake Stevens, Washington 98258

206-963-9667

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## **Response to Comment**

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Dear Ann-Gale Peterson:

Thank you for your comments regarding the Proposed Action at Paine Field.

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**From:** Richard Rafoth <[rrafoth@gmail.com](mailto:rrafoth@gmail.com)>  
**Sent:** Wednesday, October 31, 2018 4:30 PM  
**To:** Paine Field <[painefield@esassoc.com](mailto:painefield@esassoc.com)>  
**Subject:** Re: Flights and decibels.

....quiet side would be greatly appreciated. The rush to become a north Seattle commercial hub is sad.

On Wed, Oct 31, 2018 at 1:28 PM Richard Rafoth <[rrafoth@gmail.com](mailto:rrafoth@gmail.com)> wrote:  
I have lived in my home for 45 years and long wished that Paine Field would remain just a small plane/Boeing support facility.

I think the plan for 40+ flights a day and the decibel limits that are fine for Seattle, are not appropriate for the lifestyle I have come to enjoy in Chennault Beach.

I know that economics are going to rule the day. But anything that can be done to keep us on the....

--

*Richard Rafoth*

**Cycling Performance Tips:**

[Cycling Performance Tips Website](#)

**CPTIPS on Facebook:**

[Cycling Performance Tips Facebook Blog](#)

**A Doctor's Rx - Mill Creek Beacon**

[Link to Beacon Column Archive Blog](#)

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## Response to Comment

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Dear Richard Rafoth:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### **General Responses**

1-2: Scope of the Supplemental EA Analysis for Future Operations and Passengers

3-4: Noise Analysis Methodology

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From: Charlene Berquist <[charberquist@icloud.com](mailto:charberquist@icloud.com)>  
Sent: Wednesday, October 31, 2018 4:35 PM  
To: Paine Field <[painefield@esassoc.com](mailto:painefield@esassoc.com)>  
Subject: Paine field commercial flights

Hello, I am a concerned citizen of Mukilteo Washington.

I believe that with the new commercial airlines service and so many flights 24 roundtrips per day my gosh, that my neighborhood is going to be negatively impacted. The traffic is going to be so much worse than it already is around here. The noise of the planes as well as all the additional transportation will add to the Unsafety of our residents that live here.

The pollution is a huge factor, tons of schools here and older people.

If this really has to happen, please cut down on number of flights BUT MORE IMPORTANT, NO FLIGHTS AFTER 10pm.

Thankyou  
Charlene Berquist  
Sent from my iPhone

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## Response to Comment

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Dear Charlene Berquist:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### **General Responses**

- 1-2: Scope of the Supplemental EA Analysis for Future Operations and Passengers
  - 2-1: Why Can't the County Limit or Restrict Operations?
  - 3-7: Noise Impacts on Schools
  - 3-8: What are the Health Effects of Noise?
  - 3-9: Request for Noise Curfew/Activity Restrictions
  - 4-2: Air Quality
  - 5-2: Traffic Analysis
  - 6-9: Water Quality Impacts
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**From:** Peggy Cox <pcox@ix.netcom.com>

**Sent:** Wednesday, October 31, 2018 5:13 PM

**To:** Paine Field <paine@esassoc.com>

**Subject:** Starting of Commercial Flights at Paine Field: Feedback and Info requests

Hello,

I currently reside at 63rd and 136th PI SW, Edmonds in the Picnic Point Area. I appreciate the need for commercial flights in the north end of Puget Sound, given the growth in the region. I am occasionally awakened during the night when dream lifters take off, or notice the WW2 planes from the Heritage Museum and Air Force jets on occasion.

None of these items are a big deal for me personally. I am retired and frequently home during the day, so believe I have a pretty good sense of noise levels from plane traffic as they exist today.

What I can't get my brain around is what it will be like from a noise perspective when the commercial airline traffic begins given the approved total of 48 flights per day/around the clock. Where will the flight paths be? Will they be varied? What might a standard sound level be in my location? I don't have any preconceived notions that impacts on close in neighborhoods are really considered to be important by the FAA given how things have worked out at SeaTac, but I would appreciate knowing where to access information re my 3 questions above. Also, where to provide feedback if necessary after the commercial flights begin.

Thank you for your assistance,

Peggy Cox

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## Response to Comment

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Dear Peggy Cox:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### **General Responses**

3-2: Use of the DNL Metric  
3-5: Where are Flight Tracks Shown?  
3-6: What Are the Existing and Future Noise Impacts?  
3-10: Boeing 747 Dreamlifter Operations

Please also see the following individual response.

### **Noise Complaints**

You may submit noise complaints through the Airport's website at:  
<https://www.paineairport.com/FormCenter/Noise-Event-Report-3/Noise-Event-Report-43>

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**From:** Terry\_Ellen Horne <terryellen.horne@gmail.com>  
**Sent:** Wednesday, October 31, 2018 6:16 PM  
**To:** Paine Field <paine@esassoc.com>  
**Subject:** DRAFT ENVIRONMENTAL - PAINE FIELD FAA

Name Terry Horne  
Address 12332 39<sup>th</sup> Ave SE - Everett, WA 98208  
Email - [terryellen.horne@gmail.com](mailto:terryellen.horne@gmail.com)

**DRAFT SUPPLEMENTAL ENVIRONMENTAL ASSESSMENT MEETING**

I attended the draft supplemental environmental meeting. It was informative, however many of the objections to the additional air service at Paine field had already been addressed. There was a preponderance of "NOT IN MY BACK YARD" . Additionally discussion concerning the transport of parts by the Airlifter to the Boeing plant had no relevance to the needs of commercial airline service to meet the needs of Snohomish county.

I have lived in Snohomish County since 1970 and have travelled frequently to SeaTac Airport for both business and pleasure. The population growth in Snohomish County really mandates this additional air service to accommodate business and personal travel without the hassle of traveling on I5. Traveling to Seattle and SeaTac only increases the grid lock in Puget Sound. This additional travel also increases air and surface pollution.

Please consider the previous environmental studies as sufficient to allow the additional proposed air service . Thank you for the opportunity to comment.

Terry Horne

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## **Response to Comment**

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Dear Terry Horne:

Thank you for your comments regarding the Proposed Action at Paine Field.

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**From:** Bill Munson <bmunson3@gmail.com>  
**Sent:** Wednesday, October 31, 2018 6:43 PM  
**To:** Paine Field <paine@esassoc.com>  
**Subject:** Environmental Assessment for 2019 and beyond commercial air traffic

Hello,

To Whom it May Concern:

We just heard from a neighbor that Friday, November 2, 2018 is the last day for the public to comment on the proposed commencement of commercial air traffic for Paine Field. Could you advise if this is accurate?

My family lives south of Paine Field. Since we have not been notified that we would be affected, we are under the impression we are not directly under any proposed flight paths.

Thank you for your assistance.

Richard and Ann Munson

3431 Serene Way  
Lynnwood, WA 98087

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## Response to Comment

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Dear Richard and Ann Munson:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### **General Responses**

3-2: Use of the DNL Metric

3-5: Where are Flight Tracks Shown?

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From: Mardi Hopkins <mardihopkins55@gmail.com>  
Sent: Wednesday, October 31, 2018 7:19 PM  
To: Paine Field <painefield@esassoc.com>  
Subject: Commercial Flights

To Whom it may concern,

I am a long time resident of Mukilteo and in particular Harbour Pointe. I am asking you to consider not having the flight path over our area when commercial flights begin at Paine Field. We live in a pristine area with multiple schools, homes and green spaces with wildlife which will all be negatively impacted by noise levels.

I wanted my voice and objections heard.

Mardi Hopkins  
[Mardihopkins55@gmail.com](mailto:Mardihopkins55@gmail.com)

Sent from my iPhone

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## Response to Comment

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Dear Mardi Hopkins:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### **General Responses**

3-5: Where are Flight Tracks Shown?

3-6: What Are the Existing and Future Noise Impacts?

3-7: Noise Impacts on Schools

6-5: What is the Impact on Wildlife?

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From: Jason Chudy <chudman@hotmail.com>  
Sent: Wednesday, October 31, 2018 7:38 PM  
To: Paine Field <painefield@esassoc.com>  
Subject: Paine Field flights

To whom it may concern:

I am registering my support for any amount of flights from Paine Field. I live in Mukilteo and the only aircraft I hear are the largest transports clown out of there. I am supportive of the current plans as well as an expansion of the plans. I am available to discuss further if needed.

Thanks,  
Jason Chudy

Sent from my iPad

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## **Response to Comment**

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Dear Jason Chudy:

Thank you for your comments regarding the Proposed Action at Paine Field.

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**From:** Joseph DeBoli <jdeboli@hotmail.com>  
**Sent:** Wednesday, October 31, 2018 8:01 PM  
**To:** Paine Field <paine@esassoc.com>  
**Subject:** Destruction of peace.

You and your predecessors have told all those communities surrounding Paine Field not to worry about what's to come. At first it was only 6 flights a day, then we were told the flights were only during the day, never while you're sleeping. Then it was 12 flights, then 24 now we're at 48 noisy, intrusive peace destroying flights over some of the most beautiful and natural land along the coast. These flights simply put cannot pass close to the Meadowdale ravine and its surrounding area.

In addition to the mental, financial and personal anguish this would lay upon the scores of tax paying residents in our area, many of which are elderly and cannot tolerate chaos in their lives there are other issues to be considered.

Any flights in the proximity of the ravine and along the coast at the end of Fisher Road will assuredly disturb Washington's native wildlife including the nesting and feeding sites of many of our indigenous birds, including rare Owls and Bald Eagles. As you know, nature already has enough to deal with without Paine Field ruining what little natural space is left. Your team must think flight paths through thoroughly or you will cause irreparable damage.

Thank you so much for providing this forum for open dialog and thank you for your time and consideration.

Joseph DeBoli  
7126 151st St. SW  
Edmonds WA 98026

*Sent from my Verizon 4G LTE Smartphone*

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## Response to Comment

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Dear Joseph DeBoli:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### **General Responses**

- 1-2: Scope of the Supplemental EA Analysis for Future Operations and Passengers
  - 3-5: Where are Flight Tracks Shown?
  - 3-8: What are the Health Effects of Noise?
  - 6-2: What is the Impact on Property Values?
  - 6-4: What are the Health Effects Associated with the Proposed Action?
  - 6-5: What is the Impact on Wildlife?
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**From:** Katy Bigelow <arboristkaty@gmail.com>  
**Sent:** Wednesday, October 31, 2018 8:31 PM  
**To:** Paine Field <paine@esassoc.com>  
**Subject:** Paine field public comment

Hello,  
I was unable to make the public forum this week.

In my understanding of the SEA I do not believe there is any mention of how the fields around the airport will be developed to offset the CO2 and other emissions that will occur from not only planes but their maintenance and support vehicles and increased vehicular traffic to the area for airport use. How was it at all found that, "Negligible to discountable incremental impacts to surface transportation, air quality, climate, noise and noise compatible land use, and socioeconomics in the greater landscape." would occur? This seems impossible.

There is quite a lot of bare land that has no vegetation or small trees that could be filled to absorb poor air before it gets to neighborhoods. A partnership or acquisition of the museum could also help fill the gaps in this respect.

I ask that you consider the larger and longer vision of environmental impacts - this is just the beginning of changes to this area which will only increase. To state that there will be no or little environmental changes is a gross oversight - why not be proactive instead of reactive in our future? Why not make the airport GREEN instead of doing the bare minimum to cover excesses?

Thank you for your consideration,  
Katy Bigelow

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Katy Bigelow  
206.351.1375  
[www.katybigelow.com](http://www.katybigelow.com)

- ISA Board Certified Master Arborist®

International Society of Arboriculture Certified Arborist PN-6039B  
PNW ISA Tree Risk Assessment Qualified  
Registered Consulting Arborist® #490  
Member - American Society of Consulting Arborists

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## Response to Comment

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Dear Katy Bigelow:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### General Responses

1-8: Significance of Project Impacts

1-9: How is Significance Defined?

6-11: Mitigation

Please also see the following individual response below.

### Air Quality / Emissions

The impact assessment, completed for the EA, was conducted within the framework of the NEPA process and based on FAA guidance. Impacts were analyzed within the established framework of the process, and addressed and summarized accordingly. Surrounding landscape management and planning was not addressed in the Project Description for the action analyzed by the 2018 EA. Long-term land use and landscaping plans are addressed under different regulatory programs, processes and jurisdictions and generally influenced by city and sub-regional planning agencies and authorities and outside the scope of the EA process.

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From: Tyler Schaffer <tylerschaffer@gmail.com>  
Sent: Wednesday, October 31, 2018 8:43 PM  
To: Paine Field <paine@esassoc.com>  
Subject: Flight paths

To whom it may concern,

Please do not locate your flight paths over the Faire Harbour Neighborhood. The anticipated decibel noise is too great.

Sincerely,

Tyler Schaffer, AIA, NCARB, LEED AP

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## Response to Comment

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Dear Tyler Schaffer:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments

### **General Responses**

1-7: Study Areas

3-6: What Are the Existing and Future Noise Impacts?

6-1: What Are the Quality of Life Impacts?

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From: Jeff Thompson <jeffc.thompson@frontier.com>  
Sent: Wednesday, October 31, 2018 8:44 PM  
To: Paine Field <paine@esassoc.com>  
Cc: Jeff Thompson <jeffc.thompson@frontier.com>  
Subject: Paine Field Additional Flights Comments

I live on the south side of Harbour Pointe and hear every takeoff to the south. 65dBs May be acceptable in a big city like Seattle, it is too much for normally quiet cul-de-sacs neighborhoods like Mukilteo/Harbour Pointe.

I believe any request to increase flights must compare the noise back to the original application. Not say 12 flights is not significant (DNS) compared to 0. Then say 24 flights compared to 12 is DNS. Then say 48 flights compared to 24 is DNS, and so on. Each request to increase flights needs to be compared to the noise of zero flights.

The nice, family friendly, Mukilteo neighborhoods don't want to turn into the crime ridden neighborhoods around Sea-Tac airport.

Jeff Thompson  
12711 54th Avenue W.  
Mukilteo, WA 98275

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## Response to Comment

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Dear Jeff Thompson:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### General Responses

3-2: Use of the DNL Metric

6-1: What are the Quality of Life Impacts?

6-3: What is the Impact of the Proposed Action On Crime?

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**From:** Barb Carlow <barbcarlow@comcast.net>  
**Sent:** Wednesday, October 31, 2018 8:54 PM  
**To:** Paine Field <paine@esassoc.com>  
**Subject:** Neighborhood Noise with 48 flights

Hello, I live in the Meadowdale neighborhood and I am concerned about the amount of noise the additional flights will have on our quiet neighborhood. I think the flight noise for a large city and the flight noise for a smaller town/neighborhood should be handled separately and differently. Metropolitan vs urban is quite a difference in noise levels. Please consider altering the flight pattern to come in over the more noisier locations like closer to I5- rather than the smaller urban neighborhoods such as Picnic Point and Meadowdale.

Please advise what the flight pattern will be for the amount of additional flights planned for Paine Field and the noise impact you anticipate it having on our community?

thank you

Barb Carlow

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## Response to Comment

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Dear Barb Carlow:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### **General Responses**

3-5: Where are Flight Tracks Shown?

6-1: What are the Quality of Life Impacts?

6-11: Mitigation

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**From:** Jill\_Scott\_Morehead <sjgm1@comcast.net>  
**Sent:** Wednesday, October 31, 2018 9:03 PM  
**To:** Paine Field <painefield@esassoc.com>  
**Subject:** Additional Flight Concerns

To Whom it May Concern,

We are writing to express our concerns over the additional flights proposed at Paine Field. These include noise, pollution, quality of human life, effect on wild life (raptors such as owls, eagle and hawks that live in the neighbor hood).

As the number of flights that are currently being planned did not fall into the original proposal of commercial flights, we believe it is crucial to critically view the impact of noise and air pollution on neighborhoods before it is too late.

Jill and Scott Morehead

12707 Maplewood Ave

Edmonds, WA 98026

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## Response to Comment

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Dear Jill and Scott Morehead:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### **General Responses**

1-2: Scope of the Supplemental EA Analysis for Future Operations and Passengers

6-1: What are the Quality of Life Impacts?

6-5: What is the Impact on Wildlife?

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**From:** Joyce Morrill <joymorrillster@gmail.com>

**Sent:** Wednesday, October 31, 2018 9:21 PM

**To:** Paine Field <paine@esassoc.com>

**Subject:** Airline flight traffic - Paine Field

I'm emailing you to add our concerns as homeowners located in or near the flight paths going to and from Paine Field.

We purchased our home, new, almost 2 years ago and we have noticed an increase in aircraft noise over our neighborhood since that time.

It gets really loud at times. It is bad enough during the day, but we understand that there is a plan to have flights of some kind between the hours of 10 pm through 6 am. This is unacceptable.

Following the example from South Seattle neighborhoods, our neighborhood homeowners, should be compensated, by Paine Field & offending airlines, with sound-proof windows provided at no cost to the homeowners.

Sincerely,

Joyce Morrill

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## Response to Comment

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Dear Joyce Morrill:

Thank you for your comments regarding the Proposed Action at Paine Filed. Please see the following general responses that apply to your comments.

### **General Responses**

- 1-2: Scope of the Supplemental EA Analysis for Future Operations and Passengers
  - 3-6: What Are the Existing and Future Noise Impacts?
  - 6-1: What are the Quality of Life Impacts?
  - 6-5: What is the Impact on Wildlife?
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**From:** Suzi Miller <suzingarden@gmail.com>  
**Sent:** Wednesday, October 31, 2018 9:38 PM  
**To:** Paine Field <painefield@esassoc.com>  
**Subject:** Paine Field Written Comments

October 31, 2018

Environment Science Associates

Dear Associates

This is in response to the draft EIS.

First of all I am very excited to finally have the entire plan coming to fruition. I appreciate all the hard work that has been done to get to this point.

I hope this means I will never have to drive to Sea Tac again.

I appreciate all the consideration you have given to the public with all the diverse opinions.

I know I will be under a flight path and I knew of that possibility when I purchased my home

20 years ago. I will be effected by the noise and appreciate the time-of-day limits you have set for the new commercial flights.

Sincerely,

Suzi Miller

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## **Response to Comment**

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Dear Suzi Miller:

Thank you for your comments regarding the Proposed Action at Paine Field.

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**From:** lese1297@gmail.com <lese1297@gmail.com>

**Sent:** Wednesday, October 31, 2018 10:26 PM

**To:** Paine Field <paine@esassoc.com>

**Subject:** Supplemental Environmental Assessment

I am expressing my concerns and request the flight paths do not fly over us. There will be extreme noise and intolerable traffic.

Mukilteo resident

Sent from my iPhone

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## Response to Comment

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Dear Mukilteo Resident:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### **General Responses**

3-6: What Are the Existing and Future Noise Impacts?

5-1: Existing and Future Traffic

5-2: Traffic Analysis

6-1: What are the Quality of Life Impacts?

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From: April <agcooper1@comcast.net>  
Sent: Wednesday, October 31, 2018 10:28 PM  
To: Paine Field <paine@esassoc.com>  
Subject: Flight path Meadowdale neighborhood.

We, as a family are concerned about so many flights taking off and landing over our neighborhood and native wetlands each day. Since we are not a metropolitan area we are worried the noise level may be excessive. Please take this in to consideration when determining the flight paths for the new 24 passenger flights that will occur each day.

Thank you,  
April Cooper  
15510 46th Pl W  
Lynnwood, Wa 98087

Sent from my iPad

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## Response to Comment

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Dear April Cooper:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### **General Responses**

3-6: What Are the Existing and Future Noise Impacts?

6-10: Wetland Impacts

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**From:** Mary Callahan <CallahanMaryE@msn.com>  
**Sent:** Wednesday, October 31, 2018 10:38 PM  
**To:** Paine Field <paine@esassoc.com>  
**Subject:** Flight pathways and traffic concerns

To Whom it May Concern,

It is my understanding that the FAA is continuing to access the disruption to homeowners in the areas near the Paine Field airport that will be created due to the increased flights that have been authorized. Although 24 round trip flights does not seem like much to the FAA or the Environmental Association, who is conducting surveys, to those of us who will need to endure this excessive noise on a daily basis it is not acceptable.

We moved into our neighborhood in 1989 and for the last 29 years have experienced everything from flights flying near our home to those that literally sounded like they were going to land on our house. When we would go outside we could not believe how low they were allowed to fly these planes over residential areas. Recently we have been seeing more of the planes traveling on a flight path that are on a trajectory that seem to run over Hwy 99 and then head over Mukilteo Speedway to connect with Paine Field. In these instances the flight patterns are over businesses and not residences.

In addition, we are also anticipating that these increased flights will create additional traffic problems on roadways that are not meant for a high traffic volume. I am speaking of 52nd Ave West that then becomes Beverly Park Road. For years this has become a thoroughfare for traffic traveling between downtown Edmonds to Mukilteo and Everett, with traffic often backing up for distances at traffic lights during rush hours. I can only imagine what traffic will be like throughout the day as travelers use this roadway to get to Paine Field. I am aware that the above mentioned roadway was improved several years ago but continues to be a 2 lane road with a center turn lane. It was not improved enough to accept high volume traffic. The FAA and the airlines that are benefiting from the use of Paine Field should accept full responsibility for improving roadways that are impacted by these increased flights and access areas. The costs for these improvements should not be placed upon the cities and unincorporated areas that are affected. I am hoping that the effect on roadways has been taken into account during your studies.

I implore you to consider yourselves in our position and imagine your families lives being disrupted numerous times, each and every day, by these flights. I ask you also to consider, when you select your flight patterns, the impact your decision will also have on our home values. This is not a metropolitan area that can endure noise levels of 65 decibals; which I understand is what the FAA feels is acceptable. As residential neighborhoods 65 decibals is way too noisy and, when you also look at the other major changes to our areas and environment, we will not be able to retain our home values. Your decisions are affecting thousands of individuals who rely on your committees to make fair and just assessments. I understand that you have completed numerous impact studies for this situation but I ask you to put those numbers aside and base your conclusions and final outcomes on how our communities will be affected.

I would like to thank you in advance for your consideration and understanding of these difficult considerations.

Sincerely,

Mary and Dennis Callahan  
15515 53rd Pl. W.  
Edmonds, WA 98026

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## Response to Comment

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Dear Mary and Dennis Callahan:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### **General Responses**

2-4: Aircraft Currently Fly Low and Very Close to Houses

3-1: Existing Aircraft Noise Concerns

5-1: Existing and Future Traffic

6-1: What are the Quality of Life Impacts?

6-2: What is the Impact on Property Values?

6-11: Mitigation

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**P116**

From: sandy gemar <izwannalatte@gmail.com>  
Sent: Wednesday, October 31, 2018 11:09 PM  
To: Paine Field <painefield@esassoc.com>  
Subject: Paine Field commercial flight noise

We are writing to voice our concern regarding the noise impacts of commercial flights in and out of Paine field on the quiet pocket community of Mukilteo. We are asking that you please consider this community as you plan your flight paths and avoid traveling directly over it. Thanks.

Sent from my iPhone

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## Response to Comment

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Dear Sandy Gemar:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### **General Responses**

3-5: Where are Flight Tracks Shown?

3-6: What Are the Existing and Future Noise Impacts?

6-1: What are the Quality of Life Impacts?

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**From:** Donna Hough <dsalins@gmail.com>  
**Sent:** Wednesday, October 31, 2018 11:23 PM  
**To:** Paine Field <paine@esassoc.com>  
**Subject:** Paine Field Flight Paths & Decibel Levels

To: FAA

From: Dana and Donna Hough  
17414 76th Ave W  
Edmonds, WA 98026  
H: 425 672 9236

A plea, following the public meeting regarding the Supplemental Environmental Assessment that you (the FAA) are requiring prior to planning, routing, and scheduling 24 round trip flights per day over our homes.

This is in regard to two aspects of your plans: the flight paths and decibel levels of 48 commercial passenger flights over our neighborhood going in and out of Paine Field.

We purchased our Edmonds' home to be able to spend our retirement and final years in a suburban neighborhood, where we could enjoy the peaceful quality it offered.

We can, now, hear the stream running near our home and we love to work peacefully in our yard. This is a healthy and nurturing environment for seniors and families in this area. A baby eagle landed on our deck last winter! It was stunning. And a deer with antlers wandered through our yard. This is a vibrant area with amazing wildlife.

When planning "flight paths" in and out of Paine Field (which was originally designated to have no commercial passenger flights), we hope you will please consider directing these flights away from residential neighborhoods.

Please consider these current concerns, when you determine "acceptable" decibel levels for our neighborhoods.

(1) Boeing test flights are very low to the ground and extremely loud. These are not going to go away and it seems they have increased in numbers. So much so, that we often hurry outside, because the sound vibrations make you wonder if the flight is in trouble and coming down.

(2) There are also a large number of cargo flights in and out of Paine Field and, now, you have found it acceptable to add 48 additional flights in our sky on a daily basis, which is quite shocking, honestly.

For a suburban home, 65 decibels of sound is quite a dramatic level to designate as "acceptable". While this type of noise level might be less noticeable in a metropolitan or commercial area, it would be a dramatic change for ours.

We are expressing our concerns in advance of the Friday (November 2, 2018) deadline with the hope you will kindly consider our homes and life styles, as you make decisions on where these flight paths are routed.

Please consider the impact of air traffic and noise levels on our lives, when you finalize your plans for Paine Field.

Thank you,  
Dana and Donna Hough



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## Response to Comment

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Dear Dana and Donna Hough:

Thank you for your comments regarding the Proposed Action at Paine Field.  
Please see the following general responses that apply to your comments.

### **General Responses**

2-4: Aircraft Currently Fly Low and Very Close to Houses

3-1: Existing Aircraft Noise Concerns

3-2: Use of the DNL Metric

6-5: What is the Impact on Wildlife?

6-11: Mitigation

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**P118**

**From:** Donna Lundvall <jdlundvall@comcast.net>  
**Sent:** Wednesday, October 31, 2018 11:36 PM  
**To:** Paine Field <paine@esassoc.com>  
**Subject:** paine overflites

Hi, thanks for allowing input. I've been in this old house 49 years, please no direct overflites. Sincerely john and donna Lundvall 6831 fisher rd. (norma beach)

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## Response to Comment

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Dear Donna Lundvall

Thank you for your comments regarding the Proposed Action at Paine Field.  
Please see the following general response that applies to your comments.

### **General Response**

3-5: Where are Flight Tracks Shown?

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**From:** CRAIG EVERHART <craig@fundvec.org>  
**Sent:** Thursday, November 1, 2018 12:07 AM  
**To:** Paine Field <paine@esassoc.com>  
**Subject:** Questions re: Paine Field Supplemental EA

Re: Paine Field Supplemental EA

Dear Environmental Science Associates:

Unfortunately, we were unable to attend the FAA public hearing at the Lynnwood Convention Center on Monday October 29th, but after reviewing the Supplemental Environmental Assessment for commercial flights at Paine Field, we have the (following) questions that need to be answered:

1. Given the magnitude of the change in your plans, why was no public input allowed on the scope of the EIS Environmental Assessment and Supplemental that you conducted, and why was (same) not more comprehensive?
2. Why have you not ensured that the public has had adequate opportunity to voice its opinions, when in fact there has been only one public hearing held, and especially when multiple public hearings are held for *so many* other projects that are less impactful?
3. What criteria did you use to define a “significant impact”? How could your study not predict that, as commercial service at Paine Field (or, for that matter, any airport) grows, many more impacts will occur as a result?
4. How will you assure us that the cumulative impacts of all scheduled service will be assessed with any increase in operations?
5. As we are already experiencing substantial impacts from exponential population growth in our area, we would like to know how you concluded that there would be no significant impacts to our schools, traffic, noise, reduction in home values, increased taxes to cover less tax revenue, and more public services and costs?

Please understand that while we as citizens do our best to protect our environment, we are neither “anti-growth” nor NIMBYs, as long as all projected negative impacts can be minimized by thoughtful planning and a serious commitment to following up good intentions.

However, after reading the front page article in last Sunday’s (Oct. 28) edition of the *Seattle Times* titled, “*Traffic Soars – SeaTac*” (and subtitled, “*As airport looms, distant neighborhoods were promised relief that never arrived*”), we have become seriously alarmed.

We learned from the article that over 20 years ago, the SeaTac airport expansion planners had promised the public that it would alleviate projected increases in aircraft noise and pollution through its program, “Greener Skies Over Seattle”.

Since then, air traffic for SeaTac has grown tremendously, and in fact has increased *over 30% in the past five years*; however, to this day, the “Greener Skies Over Seattle” program has *never* been implemented, and as a result, neighborhoods as far away as 20 miles from SeaTac have suffered.

As citizens, homeowners *and* taxpayers, we are seriously concerned that your report is being fast-tracked for the short-term advantage of a few, and will risk detriment to the good of a public that will ultimately have to pay dearly – and in many ways – for the long-term impacts that will be created.

We look forward to receiving your response to our concerns.

Sincerely,

Mr. & Mrs. Craig L. Everhart  
5109 153<sup>rd</sup> Pl SW Unit B  
Edmonds, WA 98026-4451  
PH 425-435-1302

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## Response to Comment

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Dear Mr. and Mrs. Craig L. Everhart:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### **General Responses**

1-2: Scope of the Supplemental EA Analysis for Future Operations and Passengers

1-4: Adequacy of Public Involvement and Public Hearing

1-8: Significance of Project Impacts

1-9: How Is Significance Defined?

6-2: What is the Impact on Property Values?

6-8: Cumulative Impacts

6-11: Mitigation

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**From:** Tatiana Dashevskiy <malasmsu@gmail.com>  
**Sent:** Thursday, November 1, 2018 12:27 AM  
**To:** Paine Field <paine@esassoc.com>  
**Subject:** regarding very loud noises coming from plains at night and day time

Hello.

We are residents of north Edmonds located 10 mins away from Paine Field. We have noticed recently that number of flights passing above our house are significantly increased. Those passing flights create very loud noise which is very disturbing during the day and especially at **night time**. We have small kids, they go to bed at 9pm, and noisy flights after 9 pm wake them up.

Our community follows the rule that loud noises are not allowed after 10 pm. Surprisingly, Paine Field does not follow this rule and introduced late night flights passing above our houses after quiet hours .

It would be great if somebody could address the noise problem.

Thank you.

Sincerely,

Tatiana and Lev Dashevskiy

Residents of 12401 Marine view drive Edmonds, WA, 98026

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## Response to Comment

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Dear Tatiana and Lev Dashevskiy:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### **General Responses**

3-1: Existing Aircraft Noise Concerns

3-9: Request for Noise Curfew/Activity Restrictions

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**From:** David Forbes <integrity54321@gmail.com>  
**Sent:** Wednesday, October 31, 2018 3:06 PM  
**To:** Paine Field <paine@esassoc.com>  
**Subject:** 48 flights

To whom it may concern:

The Meadowdale Beach Park area at the northern end of Edmonds, WA is a major nesting area for bald eagles.

Please do not destroy this bald eagle habitat.

Respectfully,  
David Forbes

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## Response to Comment

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Dear David Forbes:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general response that applies to your comment.

### **General Response**

6-5: What is the Impact on Wildlife?

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**From:** Elena G. <ellnpp69@gmail.com>  
**Sent:** Wednesday, October 31, 2018 11:14 PM  
**To:** Paine Field <paine@esassoc.com>  
**Subject:** 48 flights a day

I want to submit my opposition to the commercial usage of Paine Field. I was in military aviation for 9 years. Now I am deaf in one ear and have a chronic respiratory illness.

ELLEN POPE, condo owner  
53rd Ave W, Mukilteo  
[ellnpp69@gmail.com](mailto:ellnpp69@gmail.com)

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## Response to Comment

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Dear Ellen Pope:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general response that applies to your comment.

### **General Response**

3-8: What are the Health Effects of Noise?

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**From:** aSuggestion.com <info@asuggestion.com>  
**Sent:** Wednesday, October 31, 2018 10:30 PM  
**To:** Paine Field <paine@esassoc.com>  
**Subject:** Someone shared a comment with you on aSuggestion



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Good day,

Someone you know has shared a comment, thought, or suggestion with you using aSuggestion. You might like to know who posted the comment but, bear in mind, you may have never heard this feedback if the author was forced to share it directly. Take a moment, clear your mind, and appreciate this feedback for what it's worth.

When you're done with this suggestion, poke around and offer one of your own! Enjoy using the system.

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## Response to Comment

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Due to security concerns related to e-mail spam and computer viruses, we are unable to accept comments from third-party websites (such as aSuggestion.com).

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**From:** Vibush Ramadas <vibush@gmail.com>

**Sent:** Wednesday, October 31, 2018 8:23 PM

**To:** Paine Field <paine@esassoc.com>

**Subject:** Noise Concerns due to commercial air service at Paine field [13220 59th Ave W]

To whom it may concern.

We, Vibush Ramadas and Jessica Eggleston do not welcome of the possibility of increased noise levels due to commercial air service at Paine field especially during 'quite hours'.

We live in a very quite neighborhood and spent well over half a million dollars of decades of savings to purchase our dream home at 13220 59th Ave W Edmonds.

Please take this email as our formal rejection to any potential increase to noise levels due commercial air service at Paine field other than between 9am to 5pm weekdays and 10am to 4pm weekends (Saturday and Sunday).

Regards

Vibush Ramadas

Jessica Eggleston

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## Response to Comment

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Dear Vibush Ramadas and Jessica Eggleston:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### **General Responses**

3-6: What Are the Existing and Future Noise Impacts?

3-9: Request for Noise Curfew/Activity Restrictions

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**From:** John Rankin <johnjrankin1@gmail.com>  
**Sent:** Wednesday, October 31, 2018 7:27 PM  
**To:** Paine Field <paine@esassoc.com>  
**Subject:** air traffic over Harbour Pointe

Hi, we live in the Camden Condominiums on Harbour Pointe Blvd and are very concerned about air traffic after you open up Paine Field to the 24 or so flights each day. Are the planes going to be flying over our area?? We already hear some very loud, very large sounding jets, daily, and that is certainly an irritant. SO, the question is; what direction will planes be departing and landing?

thank you

--

John J. Rankin  
4808 Pointes Drive  
Mukilteo, WA. 98275

206.353.4369 mobile

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## Response to Comment

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Dear John Rankin:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### **General Responses**

3-1: Existing Aircraft Noise Concerns

3-5: Where are Flight Tracks Shown?

3-6: What Are the Existing and Future Noise Impacts?

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**From:** Joe Baker <shelby.pa@gmail.com>

**Sent:** Thursday, November 1, 2018 10:13 AM

**To:** Paine Field <paine@esassoc.com>

**Subject:** 2018 Draft Supplemental Environmental Assessment for Proposed Commercial Air Service at Paine Field

Hello, I live on Serene Rd and have noticed the increase of air traffic, the larger aircraft shake the entire household (usually in the early afternoon). I am very concerned about the increase (as I understand 48) flights per day over Serene Lake. Understanding that 65db is an acceptable amount of noise, Lake Serene is just that, a very quiet and calm area with now roaring aircraft 100's of feet above. An adjustment of the flight path over Hwy 99 would where there is heavy traffic and commerce should be seriously considered.

Regards

Joe Baker

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## Response to Comment

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Dear Joe Baker:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### **General Responses**

3-2: Use of the DNL Metric

3-5: Where are Flight Tracks Shown?

3-6: What Are the Existing and Future Noise Impacts?

5-1: Existing and Future Traffic

6-11: Mitigation

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From: Rick Straube <straubr@comcast.net>  
Sent: Thursday, November 1, 2018 11:45 AM  
To: Paine Field <painefield@esassoc.com>  
Subject: Paine Field Flight Path

As a 25 year resident of Mukilteo I am concerned about the impact 24 round trips or 48 "passes" will have on our community.

I attended the public hearing this past week and it became clear to me that if you are one of the surrounding jurisdictions like Everett or Lake Stevens you're all for maximum air traffic because it won't affect your community or lifestyle in a adverse way. Bring it on!

Conversely, if you live in Mukilteo as I do, you're very concerned about the impact a major airport will have not only on your lifestyle but property values, etc. I believe this is only the beginning and soon the number of flights will increase. The airlines aren't investing in terminals, etc without knowledge of major profits.

I currently live in the Harboure Pointe community. Air traffic activity has increased noticeably the past two years. Some summer evenings it's unpleasant to sit outdoors and have a conversation when a plane is overhead. This all before the Paine Field expansion!

I understand that it's too late to effect major change- sad but true.

I urge you to consider our communities and the tranquil environment of Mukilteo and Harboure Pointe when choosing flight patterns. By doing this you can mitigate noise levels to a reasonable level and preserve or community.

Rick Straube

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## Response to Comment

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Dear Rick Straube:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### **General Responses**

3-1: Existing Aircraft Noise Concerns

6-1: What are the Quality of Life Impacts?

6-2: What is the Impact on Property Values?

6-11: Mitigation

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**From:** mindy mark <shopwithadietitian@hotmail.com>

**Sent:** Thursday, November 1, 2018 12:35 PM

**To:** Paine Field <painefield@esassoc.com>

**Subject:** airport expansion

As a resident in Lynnwood, and, currently, experiencing commercial airplanes flying low over our home, I am very much against this plan for commercial flights.

On various Sunday mornings, I am already awakened to some huge plane going over around 4am.

I cannot imagine what this will do to our property values, our health, it is proven that noise is not a contributor to good health, especially in maintaining normal blood pressure levels, and the health of our soil.

The draft report should spend time in my yard and hear the noise from the planes already flying over, it is SeaTac, to be sure, and who wants to live there?

24 planes a day is too many planes, and to think it will stop at that is folly.

There needs to be more study re. the impact of noise in the surrounding area, like in my Lynnwood neighborhood, which is near Edmonds Community College.

Georgene Ranney

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## Response to Comment

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Dear Georgene Ranney:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### General Responses

- 1-2: Scope of the Supplemental EA Analysis for Future Operations and Passengers
  - 1-5: Additional Study Should Be Conducted
  - 2-4: Aircraft Currently Fly Low and Very Close to Houses
  - 3-1: Existing Aircraft Noise Concerns
  - 6-2: What is the Impact on Property Values?
  - 6-4: What are the Health Effects Associated with the Proposed Action?
- 
-

**From:** Janet Williams <Littleredporsche@Comcast.net>  
**Sent:** Thursday, November 1, 2018 1:39 PM  
**To:** Paine Field <paine@esassoc.com>  
**Subject:** Commercial flights at Paine Field

Sirs:

It is time to bring commercial flight service to Paine Field! The positives far outweigh the negatives in this case and it is time to move ahead and put the years long controversy behind us.

My husband and I have lived here (Mukilteo) for 44 years and have never been awakened by air traffic, have never had an outdoor conversation interrupted, and have never seen our property values decline. I would expect this to continue.

There will be economic advantages for the area and also a great convenience advantage. Will there be some increased traffic? Probably, but our traffic has been congested for years and I think we have learned to deal with it!

PLEASE put your final stamp of approval on the proposed commercial flight service out of Paine Field and let's move forward and FLY!

Thank you for your painstaking efforts.

Janet and Vic Williams

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## **Response to Comment**

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Dear Janet and Vic Williams:

Thank you for your comments regarding the Proposed Action at Paine Field.

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**From:** annie98026@aol.com <annie98026@aol.com>  
**Sent:** Thursday, November 1, 2018 1:49 PM  
**To:** Paine Field <paine@esassoc.com>  
**Subject:** Noise Solution

*To Whom,*

*As a resident down Fisher Rd. at 7220-151st SW, Edmonds, it is important that overflights be diverted over the sound and not pass over our neighborhood. The number of flights also seems excessive!*

*Regards,  
Richard Lund, MD  
Ann Lund*

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## Response to Comment

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Dear Ann and Richard Lund:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### **General Responses**

3-6: What Are the Existing and Future Noise Impacts?

6-11: Mitigation

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From: Sarah <sarah.merrihew@gmail.com>  
Sent: Thursday, November 1, 2018 2:44 PM  
To: Paine Field <painefield@esassoc.com>  
Subject: Meadowdale neighborhood

I live in the Meadowdale neighborhood and am concerned about the additional commercial flights from Paine field and how they will impact my neighborhood and the wildlife in it. I believe the excessive noise will destroy the ambience in our community and disrupt the natural habitats within South Snohomish County. If there is anything I can do to contribute to the redirection of the Paine field flight path over my neighborhood please let me know.

Thank you,  
Sarah Merrihew  
425.213.4279

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## Response to Comment

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Dear Sarah Merrihew:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### **General Responses**

3-6: What Are the Existing and Future Noise Impacts?

6-1: What are the Quality of Life Impacts?

6-5: What is the Impact on Wildlife?

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**From:** speedoville@frontier.com <speedoville@frontier.com>

**Sent:** Thursday, November 1, 2018 2:58 PM

**To:** Paine Field <painefield@esassoc.com>

**Subject:** New Flights out of Paine Field

We are VERY MUCH in support of flights out of Paine Field!!!!!!!!!!!!!!

Most people who live in Mukilteo and the surrounding area and are against these Commercial flights knew Paine Field was there when they moved there and that there would be additional air traffic.

Don't focus on the negatives of additional noise and traffic. Boeing already flies MANY planes in and out every day.

That's what Airports are used for!!

#### FOCUS ON THE POSITIVES

1. Easy access
2. Easy and less expensive parking
3. Less delay
4. Less driving time

Sea Tac is already overcrowded so Paine Field is great for people who live in the Everett & north area.

More people means we need more options!

PAINE FIELD IS A PERFECT ONE

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## **Response to Comment**

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Dear Commenter:

Thank you for your comments regarding the Proposed Action at Paine Field.

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**From:** Jason Erwin <jason.w.erwin@gmail.com>  
**Sent:** Thursday, November 1, 2018 3:46 PM  
**To:** Paine Field <painefield@esassoc.com>  
**Subject:** Increased flight concern

Hello,

I wanted to express my deepest concerns with the proposed increase in air traffic out of Paine field. The noise, pollution and safety of the area are my top concerns not just for me but the neighbors, businesses and the environmental effects.

Please consider to choose less or use alternative locations for commercial flights.

Thank you.

Jason

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## Response to Comment

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Dear Jason Erwin:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### **General Responses**

- 1-2: Scope of the Supplemental EA Analysis for Future Operations and Passengers
  - 1-10: Consideration of Other Airports
  - 3-6: What Are the Existing and Future Noise Impacts?
  - 4-2: Air Quality
  - 6-1: What are the Quality of Life Impacts?
  - 6-6: What are the Safety Impacts due to the Air Traffic Control Tower Hours?
- 
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**From:** Gretchen Bennett Guethner <gretchenbennettg@gmail.com>  
**Sent:** Thursday, November 1, 2018 3:59 PM  
**To:** Paine Field <paine@esassoc.com>  
**Subject:** Commercial flights in/out of Paine Field

To whom It May Concern:

There is already enough flight traffic over our neighborhoods, sometimes thundering over beginning 3:30 a.m. I hardly sleep a night through under these circumstances. "Soundproofing" the house is not an option in the near future, with a moderate income and no time to pursue a major re-construction project.

Why am I forced to pay for the profits of the airlines and the fun of leisure travelers with my health and well-being? I receive neither direct nor indirect benefit from additional air traffic, pollution, and noise stress.

I do not want commercial aviation at Paine Field.

Thank you,  
Gretchen Bennett Guethner

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## Response to Comment

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Dear Gretchen Bennett Guethner:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### **General Responses**

3-1: Existing Aircraft Noise Concerns

6-4: What are the Health Effects Associated with the Proposed Action?

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From: Jo Sunderlage <sunshine5714@gmail.com>  
Sent: Thursday, November 1, 2018 4:24 PM  
To: Paine Field <paine@esassoc.com>  
Subject: Paine Field FAA hearing

I couldn't come to Monday's hearing.

You are most welcome to come to my home in Lynnwood (no not to sleep) to be in my bedroom when planes wake you at ungodly early hours and to sit on my couch and look up at the planes flying over so low you can see the lights in the window with the noise loud enough to disrupt conversation. I talked to the lawyers in the opposition suit and was disappointed at the loss.

It's really not about quality of life or value of real estate or that the big guns really listen to the cons. It's about lining pockets cause money rules. Funny that the Herald recently talked about Lynnwood as being a desirable place to live. It may not be so when whole areas of the city are subject to 24 flights a day ... hmhhh 24 hours in a day but the planes won't be flying one per hour will they?

The funny thing is I'm a traveler. An airport closer than SeaTac? Sure. All for it ... yet oh boy I'm affected and it sucks. I'd be willing to bet the hearing Monday was to appease but in the end not really listen to those who object. For serious and very real reasons.

Lynnwood resident near Alderwood Mall

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## Response to Comment

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Dear Jo Sunderlage:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### **General Responses**

1-6: Draft Supplemental EA Did Not Reflect the Opposition of the Community

2-4: Aircraft Currently Fly Low and Very Close to Houses

3-1: Existing Aircraft Noise Concerns

6-1: What are the Quality of Life Impacts?

6-2: What is the Impact on Property Values?

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**From:** GUY FLEISCHER <guy.fleischer@comcast.net>  
**Sent:** Thursday, November 1, 2018 5:04 PM  
**To:** Paine Field <paine@esassoc.com>  
**Subject:** Comments RE Draft Suppl. EA

Annoyance (in addition to hearing, sleep, health, and learning) remains the single most significant negative effect associated with aviation noise. Community annoyance is the aggregate community response to long-term, steady-state exposure conditions.

The application of the stringent DNL 65dB criterion for aviation noise sells short the full range of impacts to the community from radiated aviation noise. This is an unfortunate, but significant oversight in the current Draft Supplemental EA for Amendment to the Operations Specifications for Air Carrier Operations and Amendment to a Part 139 Airport Operating Certificate (DAE) developed for Snohomish County Paine Field.

One key form of economic manifestation of such annoyance is in depressed residential property values. Understanding that the noise level at a given property location becomes one of many property features and amenities (e.g., number of rooms, crime rate, schools) that make up the total value of any given property, it is nonetheless well documented that aviation 'noise blight' can have a direct negative effect on surrounding property values. In a study on suburban communities in Chicago, Frankel (1991) classified noise-affected property owners into two groups: those who came to their location when the location was quiet and later became the subject of aircraft noise and those who purchased the property near an operational airport from a previous owner. The report concluded that it was the members of the first group who bore the true burden of airport noise. The proposed action to establish commercial flights (and now at an increased frequency) at Paine Field Snohomish County falls under the former, leaving the current community of residential property owners to carry this burden. This broad economic impact was not fully described or addressed in the current DAE.

Further, low frequency noise is an issue for observers located near an airport runway where jet noise at the start of takeoff roll and/or the thrust reversers may cause low frequency noise impacts. Low frequency noise is unique in that it may not be adequately described by the average-weighted decibel, and may cause structural vibration that could lead to increased annoyance owing to the rattling of windows or objects on shelves or hanging on walls. Such low frequency noise impacts were also not addressed in the current DAE.

Background: In 1981, the FAA established DNL 65 decibels as the guideline level at which federal funding is available for soundproofing or other noise mitigation. Aircraft noise is currently measured on a scale that averages all community noise during a 24-hour period, known as the Day-Night Average Sound Level (DNL), and exacts a ten-fold penalty on noise that occurs during night and early morning hours. The original study by T. Schultz, BBN Report No. 2005 R, Technical Background for Noise Abatement in HUD's Operating Programs, 8 November 1971, that formed the basis of this guideline stated about this criteria: "It should be emphasized that criteria in the NEF 30 [~ DNL 65] range must be regarded as provisional. In each of the national studies in which these limits were developed, these levels of noise showed up as 'maximum tolerable' and were regarded as turning points above which annoyance increased very rapidly; but sizable portions of the population were seriously disturbed at much lower levels."

It is obvious that the originator of the "DNL 65 dB" criterion understood that it was inadequate and did not fairly measure the threshold for determining obnoxious noise, also stating in his publication: "It is well known that serious public annoyance is prevalent long before official complaints are lodged. It is

therefore obvious that these criteria are not adequate for aircraft noise abatement in the long run, since they are deliberately permissive.”

Currently, there remains significant controversy over the use of the dose-response annoyance curve first developed by Schultz and then updated by others. Fidell and Silvati (2004) identified shortcomings of this criterion for predicting annoyance in populations exposed to aircraft noise that are well-understood and well-documented. The authors argue that the U.S. National Environmental Policy Act (NEPA) (1969) requires the use of the best-available technology for disclosure of noise impacts of major federal actions, even though reliance on current approach for meeting NEPA requirements does not use the best available technology.

In conclusion, the current Suppl. DAE is not forthcoming in that it is negligent in fully describing and assessing the best available understanding of likely impacts of aviation noise to the greater community in the necessary, proper and comprehensive manner. The determination of a Finding of No Significant Impact (FONSI) is therefore questionable. This oversight is furthermore concerning since under H.R. 4: FAA Reauthorization Act of 2018, The FAA is directed to address community noise concerns by examining dispersal headings or other lateral track variations, studying the potential health impact of overflight noise, and reviewing the relationship between aircraft noise and its effect on communities surrounding airports. The FAA is fully expected to revise their outdated standards for noise intrusion and set lower intensity modern noise standards that reflect current research and practice in other developed countries (e.g., Europe and Australia).

Contact Information:

Guy Fleischer

23249 39th Ave W

Brier, WA 98036

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## Response to Comment

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Dear Guy Fleischer:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### **General Responses**

- 1-1: Adequacy and Use of FAA Guidance
  - 3-2: Use of the DNL Metric
  - 3-3: Noise Measurements and Supplemental Metrics Requested
  - 3-4: Noise Analysis Methodology
  - 3-6: What Are the Existing and Future Noise Impacts?
  - 6-2: What is the Impact on Property Values?
- 
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**From:** B D KIRK <kirkesg@msn.com>  
**Sent:** Thursday, November 1, 2018 6:23 PM  
**To:** Paine Field <paine@esassoc.com>  
**Subject:** Draft Environmental Assessment comment 2

The Environmental Impact Statement for EA-18G “Growler” Airfield Operations at Naval Air Station Whidbey Island was recently released.

It includes the following statement:

“...65 DNL is the established federal standard for determining potential high annoyance...Consistent with this guidance, 65 DNL is used to show areas with potential high annoyance in this analysis. However, aircraft noise does occur outside the 65 DNL contour. In order to more fully reflect the noise environment, the Draft EIS included noise contours of 60 DNL as well as detailed noise analysis for specific points of interest (POIs). In response to public comments, the Navy has expanded the analysis in the Final EIS to show geographic areas subject to greater than 55 DNL and has analyzed 18 additional POIs.”

The 55 DNL contours show miles of affected areas, from the San Juan Islands in the north to east of La Conner to Camano Islyin the south.

It is clear from comments made during the public hearing for Paine Field that the noise impacts for the proposed commercial flights will extend far beyond the 65 DNL curve, which only encompasses the airfield.

If the Navy can incorporate public comment from a draft document and make changes to the modeling for their final document, the FAA can certainly listen to public concern about the noise impacts of commercial aviation at Paine Field and demonstrate good faith by requiring the airlines to model noise levels of 50 or 55 DNL. The FAA should use this information in any decision based on the final environmental assessment.

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## Response to Comment

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Dear B D Kirk:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### **General Responses**

1-6: Draft Supplemental EA Did Not Reflect the Opposition of the Community

3-2: Use of the DNL Metric

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**From:** B D KIRK <kirkesg@msn.com>  
**Sent:** Thursday, November 1, 2018 6:42 PM  
**To:** Paine Field <paine@esassoc.com>  
**Subject:** Draft Environmental Assessment comment 3

The Environmental Impact Statement for EA-18G “Growler” Airfield Operations at Naval Air Station Whidbey Island was recently released.

It includes assessments for classroom/learning interference for 10 area schools, and probabilities of sleep disturbance for 30 residential points of interest.

Noise above 50 dB was considered to impact classroom learning.

Sound exposure levels were converted to a probability of awakening a sleeping person.

Mukilteo and Everett children also deserve protection from airplane noise interfering with learning. Residents around Paine Field don't want to be woken up by commercial flights.

The fact that the FAA chose to conduct an Environmental Assessment rather than an EIS should not absolve the airlines or the FAA from conducting a thorough analysis of potential impacts. The FAA should require the airlines to determine classroom learning impacts and the probability of night time awakening. The FAA should consider these results in any decision.

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## Response to Comment

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Dear B D Kirk:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### **General Responses**

- 1-1: Adequacy and Use of FAA Guidance
  - 1-5: Additional Study Should Be Conducted
  - 3-7: Noise Impacts on Schools
  - 3-8: What are the Health Effects of Noise?
- 
-

**From:** Kelsey Beaman <beamanka@gmail.com>  
**Sent:** Thursday, November 1, 2018 7:46 PM  
**To:** Paine Field <paine@esassoc.com>  
**Subject:** Paine Field Flights

Hello,

I'm very concerned about the plan to have 24 flights a day out of Paine Field. This will negatively impact the environment and citizens living in the areas surrounding Paine Field. First, the noise pollution will greatly impact the numerous schools that are in the flight path. Furthermore, the test flights already being flown disturb people while they try to sleep. Will there be hours of operation or can planes fly at all times of day? Will homes in the flight path be given new windows?

Secondly, there is an increase in pollution from both the planes and more than 2,000 extra vehicles on the roads. Is there a plan to plant more trees and plants? How is the county accounting for increased traffic on the already crowded roads? How are we going to protect our rivers and the Puget Sound from the additional runoff?

When making the flight paths, I hope you take into consideration the thousands of local residents whose lives will be adversely impacted on a daily basis. Please look at creating flight paths over the water and away from residences.

We need to be looking at the bigger picture and not just focused on job creation for big business and convenience. We only have this one Earth and it is our duty to take care of it. I want my children and grandchildren to also be able to enjoy the beauty of South Snohomish County, but that will only happen if we stand up and become good stewards of the land. Please carefully pick the flight paths and limit the amount of daily flights.

Thank you for your time,

Kelsey Beaman

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## Response to Comment

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Dear Kelsey Beaman:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### **General Responses**

- 3-1: Existing Aircraft Noise Concerns
  - 3-6: What Are the Existing and Future Noise Impacts?
  - 3-7: Noise Impacts on Schools
  - 4-2: Air Quality
  - 5-1: Existing and Future Traffic
  - 6-11: Mitigation
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## Comment Form

Snohomish County Airport/Paine Field  
 Draft Supplemental Environmental Assessment  
 Public Information Workshop  
 Monday, October 29, 2018

Name: BOB MAYER  
 Address: 5520 EAST DR EVERETT WA 98203  
 Phone or  
 Email: redchev1@comcast.net

Please provide comments in the area below. (See back or attach additional sheets if necessary):

ON OCT 16, I submitted written comments by mail,

ON OCT 29, I attended the Public Hearing and submitted verbal comments to the court reporter.

Listening to comments at the hearing prompted me to provide more comments. I have attached a pdf file of those comments to this email  
 ( FAA Paine More Comments Bob Mayer . pdf )

I also attached a pdf file of my verbal comments  
 ( FAA Paine ~~More~~ Verbal Notes for Public Hearing . pdf )

Thank you.

*Bob Mayer*

The comment period ends on November 2, 2018. Comments may be submitted at the Public Information Workshop or to the following addresses:

EMAIL: [PaineField@esassoc.com](mailto:PaineField@esassoc.com)

MAIL: ENVIRONMENTAL SCIENCE ASSOCIATES  
 PAINE FIELD SUPPLEMENTAL EA  
 5309 SHILSHOLE AVE NW, SUITE 200  
 SEATTLE, WA 98107

When I attended the public hearing in Lynnwood WA on October 29, I planned to provide verbal comments supporting the acceptance in front of the audience. Once there I found that I had the option of providing my comments directly to the court reporter which I did. I also had mailed written comments in mid-October. Rather than leave after making my comments I stayed for a while to listen to the other comments. What I heard prompted more comments.

Most of the speakers were activists who oppose commercial passenger service at Paine Field. In my opinion their arguments actually support the validity of the 2018 supplemental assessment. Most based their arguments on how bad the existing traffic and noise conditions are now but those conditions are the baseline against which the incremental effects of the 24 daily commercial flights are compared. The worse the baseline, the smaller the incremental effects of the proposed action will be.

One speaker felt that car traffic to and from the terminal will increase air pollution but the baseline includes Boeing traffic which is much greater so the relative increase will be insignificant. Passengers using Paine Field instead of Sea Tac will shorten their drive by up to two or more hours of stop and go traffic and therefore greatly reduce overall pollution in the broader area.

One speaker complained that noise from Dreamlifter operations shakes him out of bed sometimes several times a night. Again, that noise is part of the baseline and all of the commercial airplanes proposed are far quieter than the Dreamlifter. None of the airlines propose using Dreamlifters.

Many other speakers complained about existing noise levels and the validity of noise calculations in the study. No one even mentioned the noisy sounds of the coal and oil trains that travel on tracks along the Mukilteo coastline several times every day and night. If people don't have faith in the calculations, then actually going and listening to the sound from the proposed airplanes and hearing how quiet they are will validate the conclusion of the assessment.

Several complained about reduction in their property values due to increased noise and traffic. The airport was there long before they were. The commercial service noise and traffic impact are small compared to the baseline. Buyers may actually pay more to live there due to the convenience of a short drive to a first class commercial airport.

The opposing activists will continue to try to put roadblocks in the way of commercial passenger service at Paine Field but the science-based analysis and "common sense" conclude that there is no significant impact from an action that will have the huge benefit of eliminating the long drive to and from Sea Tac airport for 1.3 MILLION arriving or departing passengers per year. This underutilized federally funded airport has existed for 80 years and was built to be a Super Airport to serve passengers. It's time this promise was realized. No more delays please.

## Public Hearing Verbal Comments

My name is Bob Mayer and I am here to express my support for the final FAA approval of commercial passenger service from Paine Field.

I was born and have lived all of my life in Everett. I am retired from a forty year career as an Electrical Engineer which involved frequent air travel through Sea-Tac airport. My air travel in retirement is exclusively for pleasure trips with my family. Due to the deteriorating experience of travelling between Everett and Sea-Tac, that part of the trip is no longer a “pleasure.” Driving to Sea-Tac to catch a flight is a totally unpredictable experience that has probably discouraged profitable job-producing businesses from locating here also.

Based on Table 3.5 in the September 2018 Draft Supplemental Environmental Assessment, over 650,000 commercial passengers will depart from PAE annually with approximately the same number arriving. That’s over 1.3 million passengers relieved of the stress of commuting to and from Sea-Tac every year. Taking these passengers off of I-5 is a huge positive result of the proposed action that assessment shows has no significant impact. The facility is already built. How many decisions yield such positive results for so many people?

We have been looking forward to commercial passenger service at Paine Field for decades. It will finally fulfill the original purpose of the “super airport” when built in the 1930’s.

We live about three miles from the north end of the runway and flights frequently pass over our home. It is great to know that soon some of those flights will be carrying commercial passengers. We are looking forward to joining them.

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## Response to Comment

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Dear Bob Mayer:

Thank you for your comments regarding the Proposed Action at Paine Field.

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From: Tim Carothers <tbcvette@comcast.net>  
Sent: Thursday, November 1, 2018 7:56 PM  
To: Paine Field <painefield@esassoc.com>  
Subject: Paine Field Expansion

Why isn't there a formal noise mitigation plan as part of the introduction of commercial flights at Paine Field? Our homes and schools will be significantly impacted with the increased noise.

Tim Carothers

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## Response to Comment

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Dear Tim Carothers:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### **General Responses**

3-6: What Are the Existing and Future Noise Impacts?

3-7: Noise Impacts on Schools

6-11: Mitigation

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**From:** Jaspal Hans <jshans@gmail.com>

**Sent:** Thursday, November 1, 2018 8:23 PM

**To:** Paine Field <painefield@esassoc.com>

**Subject:** Public Comment: 2018 Draft Supplemental Environmental Assessment for Proposed Commercial Air Service at Paine Field

Dear Madam/Sir,

How does the proposed subject assessment address the Economic Impact of reduction in Property values under your study areas defined in Chapter 5.1.2?

Does your recommendation for proposed action, take the significant adverse affect on property values into consideration and provide any mitigation thereof?

Thanks,  
Jaspal Hans  
Mukilteo, WA 98275

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## Response to Comment

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Dear Jaspal Hans:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### **General Responses**

6-2: What is the Impact on Property Values?

6-11: Mitigation

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**From:** Alison Lott <verb8mreporting@frontier.com>  
**Sent:** Thursday, November 1, 2018 8:34 PM  
**To:** Paine Field <paine@esassoc.com>  
**Subject:** Paine Field Flights

To Whom It May Concern:

I live at 15309 -63rd Ave. W., Edmonds, 98026. My property abuts Meadowdale Park, which is teeming with wildlife. One major concern I have with flights out of Paine Field is noise pollution and its effect on the wildlife. I recently read an article regarding the impact of noise pollution on animals who rely on their hearing for defense against predators. Adding more noise can only cause additional problems in the delicate balance of our wildlife population.

I am also concerned about the impact to traffic in this area. I have only one choice in routes to leave my neighborhood, and it involves heading east on 148th St. If I want to go north or south, I typically do so via 52nd Ave. W. (also known as Bev-Ed Road). My only other option is Hwy 99, which is quite out of the way for most of the driving I do. As a major route to Paine Field, I feel the impact on 52nd Ave. W. would be devastating.

Please reconsider the number of flights you will allow out of Paine Field, as well as the flight patterns over sensitive areas.

Thank you.

Alison Taylor

15309 -63rd Ave. W.  
Edmonds, WA 98026  
425-743-0887 (land line)  
425-218-2622 (cell)

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## Response to Comment

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Dear Alison Taylor:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### **General Responses**

5-1: Existing and Future Traffic

6-5: What is the Impact on Wildlife?

6-11: Mitigation

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**From:** laure haug <haugplus3@gmail.com>  
**Sent:** Thursday, November 1, 2018 9:05 PM  
**To:** Paine Field <paine@esassoc.com>  
**Subject:** Comments draft ea

The ea is not adequate for the scope of work that now has 24 flights, 48 noise events not 6 flights, which is an increase of 40% on the community. I think the analysis is flawed, not up to date with Oct 2018 current traffic, noise, air pollution and urban growth issues.

An eis would be the proper assessment vehicle.

Is the ea using data from 2009, yet dated 2012?  
Has the environmental impact of a commercial plane dumping fuel into Puget sound for an emergency been factored?

Will there be a noise abatement policy for window replacement due to increased noise events?  
Flight paths should depart north to mitigate noise.

Will the minimal traffic mitigation fee cover maintenance of roads and signals?  
The traffic chart showed that there would only be a decrease of 1 (one) mph with an increase of 700-2100? vehicles per day. This analysis is based on traffic on tue,wed,Thu from 7-9am and 4-6pm according to gentleman at chart. Was Boeing traffic considered since they start at 5-6am and get off 2-3pm. I can't believe the analysis showed no added congestion on highway 99, 525, or Beverly park road.

Tentative flight times are 5am to midnight, which isn't conducive to raising a family with you children or senior citizens.

Seems that ea analysis has low balled the impact and if this goes ahead, let's have another quick analysis to see if the assumptions were accurate or not, there should be accountability.

There was no chart showing flight paths which would impact noise 65 dba, plus it was stated there would be some new flight paths for the 24 additional flights, where they figured into the black 65 dba area, what about noise air spikes?  
Noise should be 50-55 dba not 65dba.

The noise chart is not accurate, the generalized existing land use is from? 2009 or 2012 and is exactly the same for 2019 and 2024. Were building permits counted from 2012 to 2018 to show the increase? Why no increase on existing land from 2019 to 2024?

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## Response to Comment

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Dear Laure Hauge:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### General Responses

- 1-2: Scope of the Supplemental EA Analysis for Future Operations and Passengers
  - 1-3: Flawed/Inadequate Supplemental EA
  - 1-5: Additional Study Should Be Conducted
  - 2-5: Would there be an Increase in Fuel Dump/Fuel Smell/Residue?
  - 3-2: Use of the DNL Metric
  - 3-4: Noise Analysis Methodology
  - 3-5: Where are Flight Tracks Shown?
  - 5-2: Traffic Analysis
  - 6-11: Mitigation
- 
-

**From:** jdewitt678 <jdewitt678@aol.com>  
**Sent:** Thursday, November 1, 2018 9:14 PM  
**To:** Paine Field <paine@esassoc.com>  
**Subject:** Traffic concerns

To the Paine Field Association,

My greatest concern is the traffic in and around the Paine Field corridor. I believe that with the addition of an estimated 2000 more daily commuters hurrying to/from the airport will most significantly stall any ability we have to freely move about our community.

The money provided to our cities to mitigate this leaves little confidence that any action of substance will actually occur.

Unfortunately the days of Mukilteo being one of the most desirable places to live are numbered.

Sincerely,

Julie DeWitt

Sent via the Samsung Galaxy S7 active, an AT&T 4G LTE smartphone

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## Response to Comment

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Dear Julie Dewitt:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### **General Responses**

5-1: Existing and Future Traffic

5-2: Traffic Analysis

6-11: Mitigation

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**From:** Mark Fussell <markfussell@rocketmail.com>  
**Sent:** Thursday, November 1, 2018 10:07 PM  
**To:** Paine Field <paine@esassoc.com>  
**Subject:** Comments on Draft Supplemental Environmental Assessment

To whom it may concern,

I am the president of the Lake Serene Community Association (LSCA), and my comments are below.

As a long-time resident, and also acting as the water quality monitor for Lake Serene through the County Surface Water Management (SWM), I am disappointed that there appears to be no thought about the impact to the lake and surrounding neighborhood.

The lake is home to the following:

- Otter
- Eagles
- Osprey
- ducks/geese (generally around 40 geese)
- turtles
- trout/bass

Aircraft are tremendous polluters and the water quality is sure to suffer with a flight path right over the lake. Where will excess fuel and waste be dropped? SWM can give you more exact information about impacts. Right now the water quality has been slowly degrading with all the new development in the area.

The basic problem we have with development of commercial aviation is that we have no say in how the airport is used and of its impacts on our neighborhood. The FAA could open it up to be Seatac North anytime they want.

- Will there be noise mitigation for our houses and schools?
- Will there be traffic mitigation for the speedway, 148th, Beverly Park Rd, Airport rd etc.?
- Can the flight path over Lake Serene be diverted over the Speedway and 99?

No doubt many more flights than the 48 listed will be added in the future, so we are apprehensive about our inability to have a say in the use of the airport in our neighborhood and the cumulative impacts.

I would appreciate the courtesy of a reply.  
Mark Fussell  
President LSCA

Lana Weed  
Treasurer LSCA

Sonja Voice  
Secretary LSCA

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## Response to Comment

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Dear Mark Fussell, Lana Weed, and Sonja Voice:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### **General Responses**

1-2: Scope of the Supplemental EA Analysis for Future Operations and Passengers

6-5: What is the Impact on Wildlife?

6-9: Water Quality Impacts

6-11: Mitigation

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**From:** Janet Crowley <Janay55@hotmail.com>

**Sent:** Thursday, November 1, 2018 10:19 PM

**To:** Paine Field <paine@esassoc.com>

**Cc:** Janet Crowley <janay55@hotmail.com>

**Subject:** Snohomish County Airport/Paine Field---Draft Supplemental Environmental Assessment

The expansion of air traffic to Paine Field should be contingent upon an Environmental Impact Statement, as the study done for the Environmental Assessment is incomplete.

The EA study analyzes data from the area immediately surrounding the airport; addressing birds, water, runoff, fuel storage, traffic delays, noise and other factors. But, the population impacted is much more widely spread from that area-just the city of Mukilteo alone has approximately 20,000 people who are already impacted by the airport-the combined Snohomish county area, including Everett, has over 900,000 people. Further from the airport, there are impacts to noise, animal habitats, nature and traffic, but these areas are not addressed from what I have read in the assessment. Why is the scope so limited in distance?

There should be a minimum of 5-10 miles from the airport in the schematic drawings of noise levels. Airplane noise has a long range effect, not only in the immediate vicinity of the airport. The take off and landing flight paths, which the FAA should provide, should be indicated, showing all directions from the airport. Why was this not given in the initial EA?

The dBA levels should also be indicated on the flight paths, including how long the noise levels would be noticed by someone on the ground, during take-offs and during landings. People can hear even lower levels of sounds, so all the decibel ranges should be indicated over the larger area impacted by the airport. In certain areas, flight paths of other planes already travel over many living in Snohomish county; the additional flights will certainly contribute to noise stress of these residents; so give the residents detailed charts of sound impacting decibels.

To fully understand the EA, which includes approximately 200 pages, including appendixes, takes some amount of time for the average person to read or even scan. This is an important first step in the expansion of flights to Paine Field and more time should be given for the community members to read and understand the information provided. A summary page should be simple to prepare and extremely helpful.

The Environmental Impact Statement should address traffic along the main corridor of travel in Snohomish county; I-5. In the future, 10 years or more, there will be some improvements made, using taxpayer dollars, to fund the Light Rail. The airlines who want to increase use of Paine Field for their benefit should shoulder costs to alleviate inconvenience to residents and others who travel near Paine Field for other reasons. The mitigation could be based upon per passenger or number of flights. The inconveniences to those living below air traffic and near airports should be mitigated by the airlines, at least to some extent.

Why do the airlines proposing this appear to be in such a hurry to start these flights? Yes, the airport has been improved upon and has limited available space for flights. The EA is a simple, and relatively quick way, to speed things along. But because this expansion is going to be forever, it should be thorough and easily understood to the community.

The EA doesn't fully delineate how it would limit more flights in the future, up from the 24 round trip or actual 48 take off/landings per day to start, to some unknown number based upon "demand". That should be addressed, with a definite upper limit set per day. Can the FAA limit these flights once the airlines state they need more of them each day? How do the airlines decide they need more flights? Is there some oversight to that?

One of the benefits of living in Snohomish county is because of the beautiful mountains, rivers, trails and other outdoor amenities. Snohomish county residents, in general, prefer to live in quiet, residential areas away from big city stresses. The addition of more airplanes flying over certainly decreases the health benefits, and the quiet of the parks and enjoyment of outdoor activities for many thousands of people. People probably don't go hiking and look up and say, "my, what beautiful airplanes there are flying overhead!" The environment further away from Paine Field should be studied to assess negative impact upon outdoor activities. Not just decibel levels-but pollution, fuel smells, jet exhaust and even fuel dumping by the airlines.

People chose to live in this area for many reasons. An ever growing airport, without planning, will certainly decrease the value people place on their residences. It is a concern of many that more air traffic decreases home values and not one airport ever made a community more enjoyable to live in.

In closing, the FAA should take the time to conduct a comprehensive Environmental Impact Statement, instead of using the limited scope EA, to address concerns of the very large community who live in the area directly and indirectly affected by any expansion of flights into and out of Paine Field. The benefits of a more thorough approach to this proposal would be beneficial.

Sincerely,

Janet Crowley  
4505 218th St. SW  
Unit B  
Mountlake Terrace, WA 98043

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## Response to Comment

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Dear Janet Crowley:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### **General Responses**

- 1-2: Scope of the Supplemental EA Analysis for Future Operations and Passengers
  - 1-3: Flawed/Inadequate Supplemental EA
  - 1-4: Adequacy of Public Involvement and Public Hearing
  - 1-5: Additional Study Should Be Conducted
  - 1-7: Study Areas
  - 3-4: Noise Analysis Methodology
  - 5-2: Traffic Analysis
  - 6-1: What are the Quality of Life Impacts?
  - 6-11: Mitigation
- 
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From: k@incardona.net <k@incardona.net>  
Sent: Thursday, November 1, 2018 11:17 PM  
To: Paine Field <paine@esassoc.com>  
Subject: Additional flights at Paine Field

Please, no more flights coming into or leaving Paine Field!! We've lived in this area for 30 years and love the quiet, the wild life, the pristine water and beaches of the Puget Sound. The flights coming and going have already impacted the enjoyment of this lovely area, don't add more! Our local wildlife, birds, pets, children shouldn't have to be disrupted by the noise, the traffic, the negative environmental effects, these additional flights that are proposed (to those already coming and going, are causing, and will additionally cause), are terribly disturbing and shouldn't be increased.

Sent from my iPad

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## Response to Comment

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Dear Commenter:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### **General Responses**

6-4: What are the Health Effects Associated with the Proposed Action?

6-5: What is the Impact on Wildlife?

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**From:** Fred Clark <fredoclark@gmail.com>  
**Sent:** Thursday, November 1, 2018 11:27 PM  
**To:** Paine Field <paine@esassoc.com>  
**Subject:** Public Comments on Paine Field Draft Supplemental Environmental Assessment

Comments Submitted by:

Fred Clark  
 1002 9th St,  
 Mukilteo, WA,  
 98275  
[fredoclark@gmail.com](mailto:fredoclark@gmail.com)  
 November 1, 2018

## Paine Field Draft Supplemental Environmental Assessment Comments

The draft Supplemental Environmental Assessment did not include adequate community involvement. FAA AC 150/5020-1 refers to FAA AC 150/5050-4 Citizens Participation in Airport Planning. Page 40 of FAA AC 150/5050-4 notes that a comprehensive program is suitable for complex and/or controversial studies. There were lawsuits against the original Environmental Assessment, so the proposed introduction of commercial aviation at Paine Field should be considered controversial, which should have included comprehensive program of community involvement. Public involvement should have occurred early in the process to help identify alternatives to the proposed action. The single public hearing on October 29, was called a workshop, but it did not involve anything which could be considered a workshop. Also, the time between the October 29th meeting first opportunity to ask questions, and the Nov 2nd deadline for submitting comments is too short. I request additional time to submit further comments. The Draft Supplemental Environmental Assessment should be redone with a comprehensive program of community involvement.

The Draft Supplemental Environmental Assessment shows 65 DNL noise contours for 24 passenger flights a day, and for the alternative, no passenger flights. The 65 DNL is an upper limit above which open space and residential zoning are not compatible. The draft indicates that because the land within the 65 DNL boundary is not zoned for residential or open space, there is no significant impact due to noise. After attending the hearing, I understand that this means that there is no significant impact to the parties wishing to introduce commercial aviation service at Paine Field. The Draft Supplemental Environmental Assessment should be revised to consider potential health impact due to noise impact to surrounding residents with 55 DNL as an upper limit that would show no significant impact. I copy below information that supports using 55 DNL:

Administrative Conference of the United States  
 Noise and Its Effects  
 Dr. Alice H. Suter  
 Conference Consultant  
 (November 1991)

“HUD, DOT and EPA recognize Ldn = 55 dB as a goal for outdoors in residential areas in protecting the public health and welfare with an adequate margin of safety (Reference: EPA "Levels" Document.) However, it is not a regulatory goal. It is a level defined by a negotiated scientific consensus without concern for economic and technological feasibility or the needs and desires of any particular community.

The Department of Transportation's Federal Aviation Administration (FAA) has adopted a DNL of 65 as the point above which residential land-use becomes "normally unacceptable." Below this level, the FAA does not require airport authorities to draw noise contours or discuss the impact of airport noise on the surrounding communities for purposes of compatibility planning or to receive grants under the Part 150 program. (20) Thus, public policy decisions, at least on the federal level, have not considered the annoyance of individuals living in the DNL 55-65 dB range.

Recent research confirms the findings of earlier investigations relied upon by the EPA, that annoyance is often generated at day-night average sound levels well below 65 dB (Fidell et al., 1985; Fidell et al., 1991; Hall et al., 1981). Figures 4 and 5 from Fidell et al. (1991) portray the responses from surveys of two mid-sized airports in California: Burbank Airport and the Orange County Airport. The percentage of respondents highly annoyed is depicted as a function of DNL, and compared to the Schultz curve. Both studies show significantly greater numbers of people highly annoyed than would have been predicted by the Schultz curve.

For example, at 60 dB, as many as 70 percent of the Burbank population described themselves as highly annoyed and some 40 percent near the Orange County Airport.”

Also Noise: A Health Problem (Office of Noise and Abatement and Control, 1978 states that:

“It is finally clear that noise is a significant hazard to public health” and “Truly, noise is more than just an annoyance”

FAA guidelines Order 5050.4 dictate that increases in noise levels in noise sensitive land uses of over 1.5 DNL are considered significant. The Draft should be revised to see if proposed action would cause an increase of over 1.5 DNL in noise sensitive areas.

The maximum noise levels should also be plotted for the surrounding neighborhoods. A sudden loud noise of an aircraft flying over residential areas can wake people up at night. If it is not possible to determine the maximum noise levels, then night flights between 10:00 PM and 7:00 AM should not be allowed except for emergency landings.

The Draft should also be revised to consider the social economic impact of commercial noise. Airport proximity is detrimental to residential real estate values. The economic impact is highest in moderately priced and expensive neighborhoods. The Draft should be revised to include the detrimental economic noise impact both for homeowners and for city and state real estate tax revenues. Some homeowners will need to leave the area due to aircraft noise, so in addition to lower sale value, the economic impact analysis should include costs for buying, selling and moving, which would be approximately %10 percent of the current home value.

The Draft Supplemental Environmental Assessment should be revised to study the effects of traffic flow on the Hwy 525. The traffic is typically congested throughout the day. The Draft only looks at intersections. Mitigation to increase the width of Hwy 525 to reduce congestion should be included. The Draft also states that the impact of increased traffic due to the proposed introduction of commercial aviation service will be of no significant consequence due to mitigation fees. The proposed increase in commercial aviation vehicle traffic should not be allowed until the mitigation construction is completed.

The Draft should be revised to consider the impact of increased pollution run off and the impact on endangered salmon in Big Gulch and Japanese Gulch drainages. Also the environmental impact of possible dumping of aircraft fuel over the surrounding areas, and the increased risk hazardous material leaks at the airport should be evaluated, with mitigation implemented.

The Draft states that the addition of commercial service will add .03% of US greenhouse gas emissions, and concludes that this is not significant, without providing a specific rationale. It also indicates that this increase will be compensated for by other reductions taken somewhere else, without stating how these reductions will be implemented. I disagree with this assessment. In Washington state, shellfish hatcheries are failing because of an acidifying ocean, record-breaking wildfires are destroying forests and communities, and declining snowpack and earlier snowmelt in the mountains are jeopardizing summer water supplies. Orcas and salmon runs are also endangered. Worldwide catastrophic climate change is predicted unless there is a dramatic reduction in greenhouse gases. Any further increases in greenhouse gas emissions is of major significance.

A handout at the October 29 meeting states that alternative sites were not considered because the FAA does not have the authority to direct or influence commercial service providers to provide service at a particular airport. This shows that an Environmental Impact Statement is needed for region wide growth management transportation planning.

Please acknowledge receipt of these comments.

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## Response to Comment

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Dear Fred Clark:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### General Responses

1-1: Adequacy and Use of FAA Guidance  
1-4: Adequacy of Public Involvement and Public Hearing  
1-5: Additional Study Should Be Conducted  
3-2: Use of the DNL Metric  
3-8: What are the Health Effects of Noise?  
4-1: Sources of Existing Air Pollution  
6-2: What is the Impact on Property Values?  
6-5: What is the Impact on Wildlife?  
6-9: Water Quality Impacts  
6-11: Mitigation

Please also see the following individual response.

### Greenhouse Gas Emissions

While the scientific community is generally in agreement that there is a human element to exacerbating the impacts of climate change on Earth; the incremental Carbon Dioxide Equivalents (CO<sub>2</sub>e) emissions increase from this action, as addressed within the context of the NEPA process, does not establish this as a “significant” impact.

The 2012 EA concluded that greenhouse gas emissions associated with existing and future aviation activity at Paine Field would be expected to represent less than 0.03 percent of U.S. greenhouse gases; therefore, GHG emissions associated with existing and future activity at Paine Field would not be significant.

The 2018 EA determined that there would be an increase of 20,610 and 22,993 metric tons of CO<sub>2</sub>e emissions respectively at Paine Field in 2019 and 2024 if the Proposed Action was to be implemented. Currently, there are no significance thresholds established for aviation GHG emissions, and the FAA has not identified specific factors to consider in making a significance determination for GHG emissions, especially as it may be applied to a particular project. Additionally, due to the negligible change the Proposed Action would have on Paine Field’s existing operational footprint, there would be little, if any, increase in vulnerability to future climate impacts on the Airport from the implementation of the Proposed Action.

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**From:** Shawna & Russell Brenneke <brenneke@windermere.com>  
**Sent:** Friday, November 2, 2018 12:03 AM  
**To:** Paine Field <paine@esassoc.com>  
**Subject:** Public Comments

To Whom It May Concern:

I am a local resident of Mukilteo and my house backs to the take-off and landing area above Japanese Gulch. The noise from the planes wakes me up in the middle of the night. When I'm enjoying my backyard and a plane is landing or taking off I have to pause my conversations to wait for the plane to pass. I know for a fact that the dB's are louder than the 65dB's used in the study... we have taken measurements and recorded over 100dB.

I am flabbergasted that you did not include areas just outside of Mukilteo that will be greatly affected by the noise and traffic. Speaking of traffic... it's awful already. I do not understand how the folks at the public meeting this week stated that there would be no noticeable increase.

Please consider timing the flights so that residents can sleep and that traffic doesn't become unbearable. The only way that we can get to our homes is the same way everyone will be going to get to the airport so there is no escape for us.

Sincerely,

Shawna Brenneke  
1278 Hill St.  
Mukilteo WA 98275

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## Response to Comment

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Dear Shawna Brenneke:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### **General Responses**

1-7: Study Areas

3-1: Existing Aircraft Noise Concerns

3-2: Use of the DNL Metric

3-9: Request for Noise Curfew/Activity Restrictions

6-11: Mitigation

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**From:** Jan Beaman <beamanjan@gmail.com>  
**Sent:** Friday, November 2, 2018 12:08 AM  
**To:** Paine Field <paine@esassoc.com>  
**Subject:** Paine Field Noise

To Whom it May Concern,

I am writing to register a concern for the addition of commercial flights out of Paine Field. This is a terrible idea on many levels and it is hard to imagine how the concept has gotten this far. It appears that there is more interest in making money than the welfare of the local residents. My guess is that none of the people making these decisions live in the Paine Field area, because if they did, they would never be promoting this idea. It is easier to think an idea is good if it does not negatively impact you personally.

Adding more cars for the passengers of these planes to already overcrowded roads makes no sense. The traffic in the Paine Field area is already impacted by growing local neighborhoods and Boeing traffic. There is no infrastructure in place to handle additional traffic. The additional congestion will cause more noise and pollution in an area that is already stressed.

Paine Field is located very close to several schools and the take off and landing noise will definitely impact the equality of learning for many children. They do not need to be subjected to noise pollution nor exhaust fumes from jet fuel while on the playground.

Our house is currently negatively impacted with the flights that operate from Paine Field. The noise can be deafening and has even woken us up at night. In fact, just this week our sleep was interrupted at 2:30am by an obnoxiously loud airplane that flew directly over our house. This is not ok now and will only become worse as more flights are added. As I write this email, there has been continuous plane noise going overhead for at least an hour, and that is with the current flights operating out of Paine Field. Once we give permission for a certain number of flights, before we know it, that number will be multiplied and the flight noise will be non stop.

Please do not approve the expansion of flights to 24 flights per day. Keep the original number which I believe was 12, which is 12 too many. Consider adding language that guarantees the number of flights will not be increased in the future.

Also, insist that the flight path for these flights is kept over the water and not over the residential areas full of schools and homes. People should not be subjected to additional noise and the traffic congestion resulting from any additional flights. Stop the mad rush to grab a buck and consider the quality of life for the residents of this area. We do not want to become the Sea Tac of the north. It is one thing to build and test planes in your local area. It is a totally different issue to become a commercial airport!

Thank you, Jan Beaman

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## Response to Comment

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Dear Jan Beaman:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### General Responses

- 1-2: Scope of the Supplemental EA Analysis for Future Operations and Passengers
  - 3-1: Existing Aircraft Noise Concerns
  - 3-6: What Are the Existing and Future Noise Impacts?
  - 3-7: Noise Impacts on Schools
  - 5-1: Existing and Future Traffic
  - 5-2: Traffic Analysis
  - 6-1: What are the Quality of Life Impacts?
  - 6-11: Mitigation
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**From:** Denise <drsteink@aol.com>  
**Sent:** Friday, November 2, 2018 12:35 AM  
**To:** Paine Field <paine@esassoc.com>  
**Subject:** Commercial flights

As a resident in the neighborhood I am obligated by noise constraints from 1000pm to 8am. I have been disappointed that as a commercial airfield you do not have to abide by these rules with the Dreamlifter. As you expand to even more flights with commercial airlines overhead I believe the neighborhood should be given the courtesy to respect the same hours of no flights from 10P to 8A so that we can sleep. Especially in summer when windows are open.

Additionally I am concerned with increased traffic on Beverly park Blvd and the speedway. During morning and afternoon rush hour it is full and ferry traffic arrival increases the backup, I can't imagine managing airport traffic increase without some infrastructure planning/adaptations. Please don't increase the road rage from high density housing and airport.

**Denise Steinkerchner**  
Lynnwood/Meadowdale

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## Response to Comment

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Dear Denise Steinkerchner:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### **General Responses**

3-9: Request for Noise Curfew/Activity Restrictions

3-10: Boeing 747 Dreamlifter Operations

5-1: Existing and Future Traffic

5-3: Ferry Operations

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**From:** Diane Hart <seagazer755@gmail.com>  
**Sent:** Friday, November 2, 2018 12:42 AM  
**To:** Paine Field <paine@esassoc.com>  
**Subject:** Increased volume of flights scheduled for Paint Field

To whom it may concern,

I am writing to express my deep concern over the doubling of flight capacity approved for commercial airlines out of Paine Field even before commercial flights commence. This is very disconcerting. The approval of this, knowing the public outcry from surrounding communities over the first approval, which was half the number, is exactly why the public has no faith in due process. Snohomish county has not only reneged on its original agreement with the people of this area by allowing commercial flights out of Paine Field, but is doubling down on this, proving it cares little about what the community thinks.. Money seems to be at the forefront of every decision made by the county; not quality of life, environment, health.

The public was initially baited with the idea that the number of flights would be limited to 12 a day. That was a sham and a lie. These were supposed to be smaller planes, but now even the size of the planes have changed, increasing traffic volume and infrastructure problems. We knew that once it was opened up to commercial flights at all, the envelope would continued to be pushed, slowly increasing the numbers until, before we know it, we are living nextdoor to another SeaTac airport. As usual, no thought is given to infrastructure, only greed. This is a snowball rolling downhill. What next now that all 24 spots have been filled with larger planes and greater volume? Does anyone bother to govern, or does business have free reign? This seems to be all about the dollar bill and not about the lives of the community impacted. We already have airplane noise, but infrequently, and most are small planes. No longer. Our roads in the Mukilteo area are already impossible because of the ferry. You should know this is already a problem, but it's obvious you don't care. The so called impact assessment by the FAA is equally a joke. I have little faith in the days of our current administration, that any attempts to look at impacts, or regulation of any kind, are sincere. The FAA isn't living in the area. The idea that "the roads are already clogged", so what's a little more traffic, is preposterous! Snohomish County has put the cart before the horse, money before planning, with no thought to the infrastructure to support it's new big venture. If you, who know our challenges, can't be thoughtful and proactive about them, you are not doing your job.. If you were going to put a commercial airport in, it should have been done before the community grew up around it. Now, it has to be your job to set limits. You didn't plan ahead at a time when the impacts we're not as great.

Snohomish County has a horrible reputation for rubber stamping everything. For no planning. For not caring about quality of life, green spaces, parks. Prove us wrong, and govern.

Diane Hart  
Resident  
Unincorporated county near Mukilteo

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## Response to Comment

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Dear Diane Hart:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### **General Responses**

1-1: Adequacy and Use of FAA Guidance

1-2: Scope of the Supplemental EA Analysis for Future Operations and Passengers

1-6: Draft Supplemental EA Did Not Reflect the Opposition of the Community

2-1: Why Can't the County Limit or Restrict Operations?

3-6: What Are the Existing and Future Noise Impacts?

5-1: Existing and Future Traffic

5-3: Ferry Operations

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**From:** Nancy McCutchin <songbird360@mac.com>  
**Sent:** Friday, November 2, 2018 1:45 AM  
**To:** Paine Field <paine@esassoc.com>  
**Subject:** Paine Field Commercial Service Plan

Hello -

We sent you a separate email outlining our personal concerns, now we have some questions for you regarding the expansion of Paine Field air service to include commercial flights.

- Given the magnitude of this change, why wasn't a more comprehensive EIS conducted?
- Many less impactful projects hold multiple public hearings to ensure public input. Why hold only one public hearing?
- Since starting scheduled commercial service at Paine Field is bound to produce many impacts, and the scope of those impacts will grow as scheduled service grows, what criteria is being used to define a significant impact?
- What assurances are there that the cumulative impacts of all scheduled service will be assessed with any increase in operations?
- Why wasn't the effect on home values studied?
- What is the mechanism for insuring mitigation money is actually paid?

Nancy and Bob McCutchin  
13417 45th Ct W  
Mukilteo, Wa

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## Response to Comment

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Dear Nancy and Bob McCutchin:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### **General Responses**

1-2: Scope of the Supplemental EA Analysis for Future Operations and Passengers  
1-5: Additional Study Should Be Conducted  
1-8: Significance of Project Impacts  
1-9: How Is Significance Defined?  
6-2: What is the Impact on Property Values?  
6-8: Cumulative Impacts  
6-11: Mitigation

Please also see the following individual response.

### **Implementation of Mitigation**

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). If mitigation is required, it would be documented in the Record of Decision to ensure proper implementation.

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**From:** Connan Pearson <connanp@gmail.com>  
**Sent:** Friday, November 2, 2018 3:26 AM  
**To:** Paine Field <paine@esassoc.com>  
**Subject:** Comments for Supplemental Environmental Assessment

As a tax payer and resident of Lynnwood, I do not support this commercialization of Paine Field and opt for the proposed alternative: No action. A proper investigation to the impacts of the proposed action is not only a matter of moral nature, but of the health of our future. Such an investigation can be accomplished with an Environment Impact Statement.

Under the 42 U.S. Code 7609 which regulates air pollution prevention and control, the provision for Environmental Impact states that newly authorized Federal projects for construction and any major Federal agency action must consult with the Council on Environmental Quality (CEQ). The final EA will be submitted by the FAA to the CEQ under misleading pretenses. The conclusions made by the EA say there is no significant impact, yet they limited their studies to the airport land only, used antiquated methods of noise measurement, and did not even do a preliminary evaluation of individual economic impact on real property.

I would also like to point out that the commercialization of Paine Field is in direct conflict with Snohomish County's Mediated Role Determination in 1978-79.

Respectfully,  
Connan Pearson  
15119 44th Pl W  
Lynnwood, WA 98087

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## Response to Comment

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Dear Connan Pearson:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### **General Responses**

- 1-5: Additional Study Should Be Conducted
- 1-7: Study Areas
- 1-8: Significance of Project Impacts
- 1-9: How is Significance Defined?
- 2-1: Why Can't the County Limit or Restrict Operations?
- 3-2: Use of the DNL Metric
- 3-4: Noise Analysis Methodology
- 6-2: What is the Impact on Property Values?

Please also see the following individual response.

### **Council on Environmental Quality**

The Supplemental EA is not submitted to the CEQ as part of the NEPA review process.

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**From:** Kay Kikumoto <keikiku6@gmail.com>  
**Sent:** Friday, November 2, 2018 7:17 AM  
**To:** Paine Field <paine@esassoc.com>  
**Subject:** Impact of Paine Field Airport on Communities

My family lives in the Picnic Point area, and we are very concerned about the dramatic increase in noise and air pollution the airport will inflict on all of us. We have resided in this area for nearly 30 years, and the primary reason for living in our neighborhood is it is quiet, peaceful and clean. I cannot imagine how we will be able to live with the noise of planes taking off and landing every 20 to 30 minutes. It is difficult enough to hear Boeing performing test flights and jet engine tests, as well as, periodically hearing transport planes taking off. Not only do we have to tolerate aircraft fly overs, but also the late night jet engine testing which wakes me from sleep. I, myself, have had to invest in custom earplugs to wear at night. I do not believe that I should be made to wear them 24 hours a day, everyday.

Studies have shown that aircraft engine emissions exceed the greenhouse gas emissions of all other forms of transportation, and this area is regularly impacted by weather inversion, which suppress air convection, trapping air movement and therefore creating a toxic air environment. We already have significant and dangerous issues with poor air quality - this past summer, our area was recorded to have the worst air quality in the entire US - during forest fire season and during the winters when people are using their chimneys. Having aircrafts taking off 24 times a day will significantly worsen the quality of our air, especially during those periods I have mentioned above, making this place intolerable to live.

With the ever increasing events of forest fires during the summer months and the regular weather pattern of inversion layers, if Paine Field Airport decides to go forward with the plan to allow 24 takeoffs and 24 landings, I believe there will be an enormous public outcry from the community, and I believe we will then take this matter to the courts.

Please do not increase the number of flights.

Thank you very much.

Brian and Kay Jellison  
5731 145th Pl SW  
Edmonds, WA 98026

Sent from my iPad

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## Response to Comment

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Dear Brian and Kay Jellison:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### **General Responses**

1-6: Draft Supplemental EA Did Not Reflect the Opposition of the Community

3-1: Existing Aircraft Noise Concerns

3-6: What Are the Existing and Future Noise Impacts?

4-1: Sources of Existing Air Pollution

4-2: Air Quality

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From: SALLY ESTEP <estep\_s@msn.com>  
Sent: Friday, November 2, 2018 10:46 AM  
To: Paine Field <painefield@esassoc.com>  
Subject: Statement

My name is Sally Estep and I would like to submit this statement.

There is not a lot of a buffer for planes to be taking off and landing in this highly populated residential area. While I believe the best direction for takeoffs and landing is over the Boeing plant why are you flying low in other directions over residential homes? I am violated when a plane is flying directly over my head while being at home. On multiple occasions and late at night I hear a plane overhead that is very loud- louder than others. Why is this happening? There have been several plane crashes at Paine Field and I am sure close calls. I foresee disaster happening.

Sally Estep  
4820 145th PL SW  
Lynnwood, WA  
98087

ph: 425.583-5526

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## Response to Comment

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Dear Sally Estep:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### **General Responses**

2-4: Aircraft Currently Fly Low and Very Close to Houses

3-9: Request for Noise Curfew/Activity Restrictions

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**From:** Peggy Russe <peggyr@pcmgmt.us>  
**Sent:** Friday, November 2, 2018 11:09 AM  
**To:** Paine Field <paine@esassoc.com>  
**Subject:** Paine Field Airport  
**Importance:** High

I am concerned about the EIS conducted and would like to know why it wasn't more comprehensive. The EIS study was streamlined and the public wasn't able to comment. There was only 1 public hearing.

What criteria defines what a significant impact is? It is obvious to the majority of impacted citizens that starting scheduled commercial service at Paine Field (or any airport) will produce many impacts that will grow as scheduled service grows.

What assurances are there that the cumulative impacts of all scheduled service will be assessed with any increase in operations? Why wasn't the effect on home values studied? What impact will this have on traffic? I work in Bellevue and now find it takes me more time to get from Alderwood to my Harbor Pointe house than it does from Bellevue to Alderwood. I no longer am able to go to the Mukilteo public market due to the traffic on the Speedway.

What is the mechanism for insuring any mitigation money is actually paid?

Peggy Russe  
Office – 425-460-2511  
Cell – 206-571-7489

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## Response to Comment

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Dear Peggy Russe:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### **General Responses**

- 1-1: Adequacy and Use of FAA Guidance
  - 1-3: Flawed/Inadequate Supplemental EA
  - 1-4: Adequacy of Public Involvement and Public Hearing
  - 1-5: Additional Study Should be Conducted
  - 5-2: Traffic Analysis
  - 6-8: Cumulative Impacts
  - 6-11: Mitigation
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**From:** Sharon Swann <swann2000@hotmail.com>  
**Sent:** Friday, November 2, 2018 11:16 AM  
**To:** Paine Field <paine@esassoc.com>; flish5@yahoo.com  
**Subject:** Paine Field Airport - Comments from Mukilteo Neighbours

Thank you for the public meeting last Monday. I do have some additional comments:

1. Why wasn't a more comprehensive EIS conducted given the magnitude of this change with out any PUBLIC input
2. Why only hold one public hearing when so many less impactful projects today hold multiple public hearings to ensure public input
3. What criteria defines what a significant impact is? It is obvious to the majority of impacted citizens that starting scheduled commercial service at Paine Field (or any airport) will produce many impacts that will grow as scheduled service grows.
4. What assurances are there that the cumulative impacts of all scheduled service will be assessed with any increase in operations?
5. Why wasn't the effect on home values studied?
6. What is the mechanism for insuring any mitigation money is actually paid?

Have a wonderful and blessed day!  
Sharon  
425.349.1807

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## Response to Comment

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Dear Sharon Swann:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### **General Responses**

- 1-3: Flawed/Inadequate Supplemental EA
  - 1-4: Adequacy of Public Involvement and Public Hearing
  - 1-5: Additional Study Should Be Conducted
  - 1-8: Significance of Project Impacts
  - 1-9: How Is Significance Defined?
  - 6-2: What is the Impact Upon Property Values?
  - 6-8: Cumulative Impacts
  - 6-11: Mitigation
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From: Kiran Asher <kiranasher@aol.com>  
Sent: Friday, November 2, 2018 11:24 AM  
To: Paine Field <painefield@esassoc.com>  
Subject: Paine field impact in Mukilteo/Edmonds

Sir/Madam,

We understand that there's been a proposal to increase commercial flights to 46 per day.

1. Could you please share the increased level of noise that this will cause.
2. Also share the decrease in the house values in the neighboring areas.
3. Specific maps of flight paths for incoming and out going flights, so we can charge the impact on our house, and the noise level one over outdoors

Kiran Ashe

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## Response to Comment

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Dear Kiran Asher:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### **General Responses**

3-5: Where are Flight Tracks Shown?

3-6: What Are the Existing and Future Noise Impacts?

6-2: What is the Impact on Property Values?

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**From:** denys hoistad <denyshoistad@yahoo.com>  
**Sent:** Friday, November 2, 2018 11:51 AM  
**To:** Paine Field <paine@esassoc.com>  
**Subject:** Commercial air traffic

I have a number of concerns regarding commercial air traffic at Paine Field.

We have lived in the area for 17 years and we are raising our family here. My husband works in Mukilteo and we choose it for the small town atmosphere, good schools, safety and beauty of the area. Of course, it would be convenient to have commercial flights out of Paine field, but my concerns are at what cost to the community. As a resident, I don't feel comfortable that the impacts have been thoroughly evaluated for all concerned.

Specifically, my concerns are:

1. Has there been a significant study that shows all of the implications of the service and how the airlines, airport or county will address the implications? I have only seen a very cursory study.
2. Should the airlines wish to increase their flights, what will the process be?
3. What are the anticipated effects on our home values? Do residents have a vote if they wish to see this service implemented and forego their home values and have increased traffic, air and noise pollution?
4. What about homes that are significantly impacted by the noise? Is there any sound barrier protection for these homes? When we purchased our home, the airport was not a commercial airport. Surely the airlines or county bear some responsibility to make this right for the residents. Where is all of the revenue for the county and airlines going - does any go back to the community?

I would like to see this issue have more complete thought and to be put on a ballot for the community to vote on it. If the majority wishes to have this service available at Paine Field so be it. Without a vote I feel that it's just being pushed on us. The county and airlines make all of the revenues and Mukilteo has to live with the negative fall out with no commitments or assistance provided. Doesn't seem right - who is representing our community?

Now is the time to perform complete studies and involved the area residents. It will go a long way in making it a community event and having residents embrace it for the long term. In the end, even those not in favor of the flights would at least feel heard and included in the tough decision.

I appreciate your response to these important questions.

Thank you.  
Denys Hoistad  
Resident of Mukilteo

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## Response to Comment

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Dear Denys Hoistad:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### **General Responses**

- 1-1: Adequacy and Use of FAA Guidance
  - 1-2: Scope of the Supplemental EA Analysis for Future Operations and Passengers
  - 1-3: Flawed/Inadequate Supplemental EA
  - 2-1: Why Can't the County Limit or Restrict Operations?
  - 2-2: Mediated Role Determination (MRD) Document
  - 3-4: Noise Analysis Methodology
  - 3-6: What Are the Existing and Future Noise Impacts?
  - 6-2: What is the Impact on Property Values?
  - 6-11: Mitigation
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November 2, 2018

Environmental Science Associates

5309 Shilshole Avenue, N.W. Suite 200

Seattle, WA 98107

Subject: Comments relative to the Paine Field Draft Supplemental Environmental Assessment (submitted via email)

As a resident of Mukilteo and steward of Japanese Gulch, I am submitting these comments to highlight what appears to be an oversight relative to the presence of species listed for protection under the Endangered Species Act (ESA) in the area and the potential water quality related risks to them associated with drainage from Paine Field. Since the time that the Environmental Assessment was published by the Barnard Dunkelberg Company in 2012, a major study (Beamer et.al. 2013<sup>1</sup>) was conducted that documents the presence of ESA listed species, specifically Chinook salmon, in multiple streams that receive runoff from Paine Field. These streams include Big Gulch and Japanese Gulch. This information supplements existing knowledge regarding the presence of Chinook salmon in the Lake Washington Watershed which also receives inflow from Paine Field via Swamp Creek. Per the materials distributed by Environmental Science Associates at the open house, this would fall in the category of a change in local environment or at least change in knowledge relative to the local environment. The final version of the Supplemental Environmental Assessment being prepared by Environmental Science Associates must incorporate this scientific information to be considered sound and valid.

While it is true that a significant increase in impervious area is not likely to occur, there is a risk from the increased level of activity on that impervious area. State of the art, effective treatment of the runoff from Paine Field is essential to the protection of these adjacent ESA identified critical habitats. In addition to water quality related concerns, there is the real risk that climate change induced increases in rainfall intensity may further exacerbate the alteration of hydrologic patterns in the neighboring watersheds. This excerpt from Beamer (2013) highlights the importance the Big Gulch and Japanese Gulch stream systems, as well as other similar systems:

*“These small streams appear to be one of the habitats used by fry migrant Chinook salmon after they have left their natal river. Protecting and restoring these streams would benefit the recovery of Whidbey Basin Chinook salmon populations because all rivers demonstrate existence – if not an abundance – of fry migrants in their populations. Providing habitat opportunity for fry migrants should improve survival of this life history type and improve overall viability of the populations through improved life history diversity.*

*The small coastal streams of the Whidbey Basin are often spatially and/or temporally intermittent. They could easily be overlooked as potential salmon habitat, especially for Chinook salmon, since no Chinook spawning occurs in these streams. The streams are small enough that instream habitat can easily be degraded through direct actions such as channel straightening, armoring, removal of riparian vegetation, and culverting.*

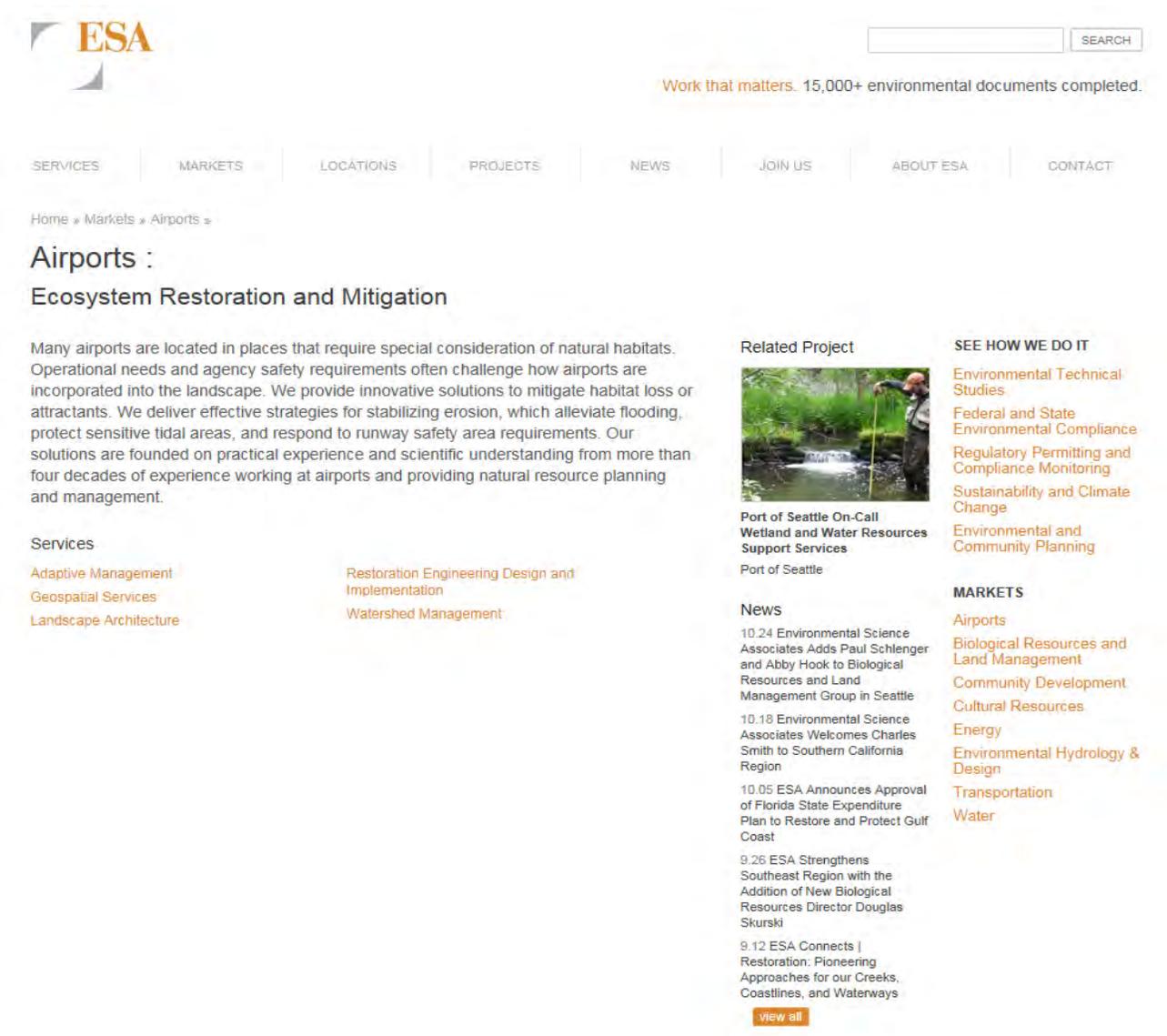
*The watershed areas of these streams are generally quite small and therefore more susceptible to development actions that change the hydrologic character of streams, such as rerouting flow when roads are developed in the watershed (e.g., not enough culverts, not the right location of culverts) or extending channels through ditching, resulting in a flashier hydrograph.*

Before being considered “final”, the Supplemental Environmental Assessment must be updated and revised to ensure that adequate measures are in place to ensure the full protection the habitats used by ESA listed stocks including not only directly impacted Chinook salmon but also the indirectly impacted Southern Resident Killer Whale population. As

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<sup>1</sup> Beamer, E.M., W.T. Zackey, D. Marks, D. Teel, D. Kuligowski, and R. Henderson. 2013. Juvenile Chinook Salmon Rearing in Small Non-Natal Streams Draining into the Whidbey Basin.

indicated below, it is clear that the consultants hired to complete the Supplemental Environmental Assessment are well equipped to address this deficiency.



**Services**

- Adaptive Management
- Geospatial Services
- Landscape Architecture
- Restoration Engineering Design and Implementation
- Watershed Management

**Related Project**

**Port of Seattle On-Call Wetland and Water Resources Support Services**  
Port of Seattle

**News**

- 10.24 Environmental Science Associates Adds Paul Schlenger and Abby Hook to Biological Resources and Land Management Group in Seattle
- 10.18 Environmental Science Associates Welcomes Charles Smith to Southern California Region
- 10.05 ESA Announces Approval of Florida State Expenditure Plan to Restore and Protect Gulf Coast
- 9.26 ESA Strengthens Southeast Region with the Addition of New Biological Resources Director Douglas Skurski
- 9.12 ESA Connects | Restoration: Pioneering Approaches for our Creeks, Coastlines, and Waterways

[view all](#)

**SEE HOW WE DO IT**

- Environmental Technical Studies
- Federal and State Environmental Compliance
- Regulatory Permitting and Compliance Monitoring
- Sustainability and Climate Change
- Environmental and Community Planning

**MARKETS**

- Airports
- Biological Resources and Land Management
- Community Development
- Cultural Resources
- Energy
- Environmental Hydrology & Design
- Transportation
- Water

Thank you for providing me with the opportunity to respond and comment on the Draft Supplemental Environmental Assessment.

Sincerely,

Keith Binkley

4628 75<sup>th</sup> Street SW

Mukilteo, WA 98275

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## Response to Comment

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Dear Keith Binkley:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### **General Responses**

6-5: What is the Impact on Wildlife?

6-9: Water Quality Impacts

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**P163**

From: Comcast <jsjd@comcast.net>  
Sent: Friday, November 2, 2018 12:53 PM  
To: Paine Field <paine@esassoc.com>  
Subject: Commercial Flights

I live in Meadowdale and am very concerned about opening Paine Field to commercial flights. I am really hoping that the airport will try to be a good neighbor, for that is what we are a neighborhood. I am sure there are things that can be done with flight patterns to minimize noise in neighborhoods. The airplanes we have now flying overhead are all I can stand. Traffic is also a big concern. We already have ridiculous congestion and the airport is going to cause backup problems on Beverly Park rd to be intolerable!

I appreciate your consideration of this  
Susan O'Hare  
15528 53rd pl  
98026

Sent from my iPhone

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## Response to Comment

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Dear Susan O'Hare:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### **General Responses**

- 2-1: Why Can't the County Limit or Restrict Operations?
  - 2-4: Aircraft Currently Fly Low and Very Close to Houses
  - 3-1: Existing Aircraft Noise Concerns
  - 3-6: What Are the Existing and Future Noise Impacts?
  - 5-2: Traffic Analysis
- 
-

From: Ron Savage <ronsavage@isomedia.com>  
Sent: Friday, November 2, 2018 1:05 PM  
To: Paine Field <painefield@esassoc.com>  
Subject: Paine Field Airport Commercial Flights

I am concerned about a number of issues, please address the following:

1. Traffic congestion at the intersection of Beverly Edmonds Road and Mukilteo Speedway is already a nightmare. Given that this problem is a huge safety issue and will become totally unbearable to the public with the additional airport traffic, what is the plan to alleviate this situation?
2. Is there any plan to compensate homeowners for the inevitable reduction in home values as a result of the increased, congestion, pollution and noise impact?
3. Given the scope of this airport expansion, why was a comprehensive environmental impact study bypassed despite the public making it clear that this was required and yet it was never done?

Ronald Savage  
3816 Serene Way  
Lynnwood, 98087

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## Response to Comment

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Dear Ronald Savage:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### **General Responses**

- 1-1: Adequacy and Use of FAA Guidance
  - 1-3: Flawed/Inadequate Supplemental EA
  - 1-5: Additional Study Should be Conducted
  - 5-1: Existing and Future Traffic
  - 5-2: Traffic Analysis
  - 6-2: What is the Impact on Property Values?
- 
-

**From:** Shannon Jay <shannonjay@comcast.net>

**Sent:** Friday, November 2, 2018 1:16 PM

**To:** Paine Field <paine@esassoc.com>; mayoly@aol.com; Shannon Jay <shannonjay@comcast.net>

**Subject:** Questions & Comments on Paine Field Supplemental Environmental Assessment

Please see our questions and comments below concerning the Paine Field Supplemental Environmental Assessment:

Why wasn't the effect on home values studied? Living in this area for over 20 years, we watched the SeaTac Airport expansions with home and property values dramatically decreasing there and the area changed, not for the better. Concerning traffic, the traffic in the morning and again early through late afternoon is already a steady flow on Beverly Park Road. It can be very difficult to get out onto Beverly Park Road from 47th Place W, a street we depend on to get out of our neighborhood. What will be done to help with increased traffic on Beverly Park Road and 47th Place W once the airport begins scheduled flights? It gets worse at Beverly Park Road and Mukilteo Speedway where the traffic is backed up for blocks. Is anything going to be done to help with the increased traffic on Mukilteo Speedway and especially around the Beverly Park Road once the scheduled flights begin?

What is the mechanism for insuring any mitigation money is actually paid?

What assurances are there that the cumulative impacts of all scheduled service will be assessed with any increase in operations?

What criteria defines what a significant impact is? It seems obvious to the majority of impacted citizens that starting scheduled commercial service at Paine Field, or any other airport for that matter, will produce many impacts that will only get worse as the scheduled service grows. To the point, that scheduled service already increased with news service would begin at Paine Field starting with a much lower number of flights per day jumping to the number it is now. What will be done to protect us from impact? Who will be paying for these costs?

Why only hold one public hearing when so many less impacted projects today hold multiple public hearings to ensure public input? We were not able to attend the one meeting and it would have been nice to have had another date to be able to attend such an important meeting with a project, a commercial airport, that impacts us greatly.

Why wasn't a more comprehensive EIS conducted given the magnitude of this change? It was conducted in such a streamlined EA and a Supplement without any public input on the scope of the study.

We feel very disappointed that we the public, especially the people of Mukilteo, have not been able to participate on this project since it will be impacting our home values and our quality of life. We also feel disappointed the Mediated Role Agreement was not used in the decision to expand to commercial service at Paine Field or in the EA, why not? We purchased our home, signing the Mediated Role Agreement, with the understanding that no commercial flights would

begin at Paine Field and that was ignored, Why was it ignored? There is an impact to us with Paine Field comensing with commercial flights.

Looking forward to your answers to our questions.Thank you,

Shannon & Mike Jay

13517 42nd Ave W

Mukilteo, WA 98275

[shannonjay@comcast.net](mailto:shannonjay@comcast.net)

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## Response to Comment

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Dear Shannon and Mike Jay:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### **General Responses**

- 1-1: Adequacy and Use of FAA Guidance
  - 1-2: Scope of the Supplemental EA Analysis for Future Operations and Passengers
  - 1-3: Flawed/Inadequate Supplemental EA
  - 1-4: Adequacy of Public Involvement and Public Hearing
  - 1-5: Additional Study Should be Conducted
  - 1-8: Significance of Project Impacts
  - 1-9: How Is Significance Defined?
  - 2-2: Mediated Role Determination (MRD) Document
  - 5-1: Existing and Future Traffic
  - 5-2: Traffic Analysis
  - 6-1: What are the Quality of Life Impacts?
  - 6-2: What is the Impact on Property Values?
  - 6-8: Cumulative Impacts
  - 6-11: Mitigation
- 
-

**From:** Paul Richer <paul.richer@gmail.com>

**Sent:** Friday, November 2, 2018 1:19 PM

**To:** Paine Field <painefield@esassoc.com>

**Subject:** Comments regarding scheduled commercial flights at Paine Field

My home is directly under the flight path for Paine Field. Clearly, the increased noise from additional flights will have a negative impact on the value of my home.

Why wasn't the effect of these increased flights studied?

What form of compensation can I expect to mitigate a decrease in my home's value?

How can I be sure that I will receive any mitigation money?

Regards,

Paul Richer

3418 W. Mukilteo Blvd

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## Response to Comment

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Dear Paul Richer:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### **General Responses**

3-6: What Are the Existing and Future Noise Impacts?

6-2: What is the Impact on Property Values?

6-11: Mitigation

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**From:** kcalawa <kcalawa@gmail.com>  
**Sent:** Thursday, November 1, 2018 11:22 PM  
**To:** Paine Field <painefield@esassoc.com>  
**Subject:** Paine Field Commercial Flights

I have concerns over the increased noise pollution in the area near Paine Field with the 48 commercial flights. Please consider keeping the flight paths over major roads like Mukilteo Speedway, Hwy 99 and Hwy 525, to protect the surrounding residential neighborhoods from the increased noise of additional flights.

Thanks,  
Kristine Calawa

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## Response to Comment

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Dear Kristine Calawa:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### **General Responses**

- 2-1: Why Can't the County Limit or Restrict Operations?
  - 2-4: Aircraft Currently Fly Low and Very Close to Houses
  - 3-5: Where are Flight Tracks Shown?
  - 3-6: What Are the Existing and Future Noise Impacts?
- 
-

**From:** Nancy McCutchin <songbird360@mac.com>  
**Sent:** Thursday, November 1, 2018 9:07 PM  
**To:** Paine Field <paine@esassoc.com>  
**Subject:** Commercial Flights at Paine Field

Hello -

We have been residents of Mukilteo for about 40 years. We chose our current neighborhood because it allowed us to live on a quiet cul-de-sac. We are approximately 5 miles south of Boeing, and we were aware of the airplane flights out of Paine Field for Boeing flight tests and deliveries. We were also aware of the daily small airplane flights and the annual aviation celebrations. The noise level was tolerable for many years.

However, the noise levels have substantially increased with the release of the 787. Boeing is taking 787 component deliveries via flights in/out on the Dreamlifter. Due to the age of this model of 747 they are not equipped with the newer, quieter engines and noise reduction packages. When "Big Ugly" (as I like to call the Dreamlifter) comes and goes the whole house reverberates with a very distinguishable, very loud sound. It happens at all hours of the day or night. I have been jarred awake from a deep sleep too many times to count. It is so loud it requires any conversation to stop or the participants are required to yell at each other to be heard. In addition, there are now a couple of aviation restoration companies operating out of Paine Field. On a lot of summer weekends, they fly their old model aircraft. As you can imagine, those old planes are extremely noisy. We chose to stay here because we love Mukilteo and our neighborhood. We chose to tolerate the increased noise levels. However, enough is enough!

I tell you all of this, because the current noise conditions are already much worse than when we moved in. It is bad enough already without adding commercial flights to the mix. Commercial flights of any kind will take the noise level way over the top. Several of the current Boeing flight paths are only a few blocks away from my house. Adding more flights will make this intolerable.

The proposed "acceptable" decibel level of 65dB is not acceptable in our environment, particularly when considering the noise level of the flights that already exist. Also, being able to fly in/out in early mornings or late evenings is not acceptable. We already have way too many sleep interruptions from current Dreamliner flights. When you combine the current noise levels with the proposed noise levels it is not acceptable for our quiet neighborhood.

The quantity of passengers on our roads will further clog an already congested city and surrounding areas. Airport road, Hwy 99, and the Mukilteo Speedway are totally congested at various times of the day. Also, the same is true for the surrounding main streets, on/off ramps for freeway access. This increase in traffic will make our area impassable. Also, the air pollution from airplane engine exhaust will devastate our current air quality.

In lieu of the major scope of this project, a full fledged environmental impact study should be completed. It is not too late.

The current cap on flights will not last. It will only get worse. The mayors of Mukilteo, Lynnwood and Edmonds are in opposition to this expansion, as well as many citizens impacted by this expansion. We firmly stand in opposition to this expansion.

Nancy and Bob McCutchin  
13427 45th Ct W  
Mukilteo, Wa

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## Response to Comment

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Dear Nancy and Bob McCutchin:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### **General Responses**

- 1-1: Adequacy and Use of FAA Guidance
  - 1-2: Scope of the Supplemental EA Analysis for Future Operations and Passengers
  - 1-3: Flawed/Inadequate Supplemental EA
  - 3-1: Existing Aircraft Noise Concerns
  - 3-2: Use of the DNL Metric
  - 3-4: Noise Analysis Methodology
  - 3-6: What Are the Existing and Future Noise Impacts?
  - 3-10: Boeing 747 Dreamlifter Operations
  - 4-2: Air Quality
  - 5-1: Existing and Future Traffic
  - 5-2: Traffic Analysis
- 
-

**From:** BABAK ARVANI <babak\_arvani@yahoo.com>  
**Sent:** Friday, November 2, 2018 1:49 PM  
**To:** Paine Field <paine@esassoc.com>  
**Subject:** Paine field Environmental studies

Hello,

I am a resident of Harbour Pointe in Mukilteo whom will be impacted by commercial Flights out of Paine Field airport.

I have the following questions for your association.

1- Why wasn't a more comprehensive EIS conducted given the magnitude of this change (they conducted a streamlined Environmental Assessment and a Supplemental without any public input on the scope of study)

2- Why only hold one public hearing when so many less impactful projects today hold multiple public hearings to ensure public input?

3- What criteria defines what a significant impact is? It is obvious to the majority of impacted citizens that starting scheduled commercial service at Paine Field (or any airport) will produce many impacts that will grow as scheduled service grows.

4- What assurances are there that the cumulative impacts of all scheduled service will be assessed with any increase in operations?

5- Why wasn't the effect on home values studied

6- What is the mechanism for insuring any mitigation money is actually paid?

I will wait for your replies.

Thank you.

Babak Arvani

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## Response to Comment

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Dear Babak Arvani:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### **General Responses**

- 1-2: Scope of the Supplemental EA Analysis for Future Operations and Passengers
  - 1-3: Flawed/Inadequate Supplemental EA
  - 1-4: Adequacy of Public Involvement and Public Hearing
  - 1-5: Additional Study Should be Conducted
  - 1-8: Significance of Project Impacts
  - 1-9: How Is Significance Defined?
  - 6-2: What is the Impact on Property Values?
  - 6-8: Cumulative Impacts
  - 6-11: Mitigation
- 
-

**From:** MICHAEL & DIANE Hoover <mrdghoover@comcast.net>  
**Sent:** Friday, November 2, 2018 2:04 PM  
**To:** Paine Field <paine@esassoc.com>  
**Subject:** Acceptance of the Supplemental Assessment

I am a homeowner in Mukilteo right near Paine Field. We bought our home in 1991 partly based on the realtor ensuring us that the airport was to remain general aviation and not include commercial flights, based on a Memo of Agreement with the airport and Snohomish county. We would have never purchased the home if we thought that agreement was to be welsed on. My family would like answers to the following questions:

1: Is the county prepared to pay possible damages to homeowners like me that may take part in class action litigation for loss of home value due to increase activity, noise, traffic and pollution from adding commercial flights? Given that all of Harbour Pointe and hundreds of other homes were built based on the MOU with the county, and the thousands of dollars drop in home values per house, is the county prepared to pay the millions of dollars if the homeowners win the lawsuit?

2: Why wasn't a more comprehensive EIS conducted given the magnitude of this change, and without any public input on the scope of the study? A streamlined Environmental Assessment and Supplemental assumes that the minimal amount of airline traffic first approved won't expand in the future as other airlines and more flights startup. We know that the FAA states that as soon as just one airline is approved for flights, no one can stop other airlines to come in with virtually an unlimited number of flights per day.

3: Why was there only one public hearing when so many less impactful projects today hold multiple public hearings to ensure public input?

4: I am 69 years old and grew up in Long Beach, CA. My parents lived near the Long Beach Airport and I witnessed the catastrophic changes in the neighborhood when commercial flights started at the airport. Home values dropped, traffic increased drastically, noise and pollution affected homes, schools, and businesses. My question is: What criteria defines what a significant impact is, and how will the cumulative impacts of all scheduled service be assessed with the inevitable increase of operations?

5: What is the mechanism for insuring any mitigation money is actually paid? Who is to pay for the inevitable widening of the Mukilteo Speedway, and numerous other roads and streets? Who will pay for rehab of schools for noise suppression? Who will pay for increase police protection when the numerous bars and cheap motels come in like exist around SeaTac?

I appreciate your answers to these questions. My wife and I are just citizens who thought that agreements made by the county and the airport like the MOU would be

kept. We keep our promises and taught our kids to do the same. I'm just wondering how many lawyers are going to jump at the chance to represent my wife and I, and countless other homeowners, in a class action suit against the county for renigging.

Thank you very much, Michael and Diane Hoover: 8703 53rd Pl W. Mukilteo, WA 98275

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## Response to Comment

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Dear Diane and Michael Hoover:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### General Responses

- 1-1: Adequacy and Use of FAA Guidance
  - 1-2: Scope of the Supplemental EA Analysis for Future Operations and Passengers
  - 1-3: Flawed/Inadequate Supplemental EA
  - 1-4: Adequacy of Public Involvement and Public Hearing
  - 1-5: Additional Study Should be Conducted
  - 1-8: Significance of Project Impacts
  - 1-9: How Is Significance Defined?
  - 2-2: Mediated Role Determination (MRD) Document
  - 6-2: What is the Impact on Property Values?
  - 6-11: Mitigation
- 
-

LETTER TO FAA REGARDING COMMERCIAL FLIGHTS AT PAINE FIELD

FAA

1601 Lind Ave. SW, Renton, WA 98057

Commercial flights at Paine Field! My worst nightmare is about to come true. I have opposed commercial flights at Paine Field many times in the past, writing letters and emails, contacting Paine Field, airlines and the FAA (see attached). There are many significant reasons not to allow commercial flights over the Lake Goodwin/Seven Lakes Area.

This action will destroy a beautiful, serene, ecologically sensitive and important area, the Lake Goodwin/Seven Lakes area of Washington. This area is a quiet, peaceful area, and home to many people and abundant native wildlife including nesting eagles, osprey, the rare Western Tanager bird, and countless other animals, sensitive wetlands and habitats. There are two County parks on the lake, one with a boat launch, used by people year-round. Fishing year round is extremely popular.

There is also a large Boys and Girls Club here that has many children there for summer camps, and after school activities at other times, also directly under the approach to Paine Field.

The noise, pollution and danger that these flights will cause is UNACCEPTABLE! (see attached article regarding living under airplane noise).

If my nightmare does come true, and they actually do start these unnecessary flights, YOU MUST RAISE THE MINIMUM ALTITUDE ABOVE THE LAKE GOODWINN AREA TO AT LEAST 10,000 FEET. The current allowed altitude is 3,000 MSL on the ILS approach and 2,000 MSL on the NDB approach when crossing the outer marker (RITTS) at Mission Beach, THE MARKER IS TOO FAR NORTH, AS ADMITTED BY PAINE FIELD OFFICIALS. (see attached). Lake Goodwin is at approximately 500 feet above sea level.

Even an occasional flight by a Boeing test plane is very disturbing and too low and noisy now, I can't imagine what will happen if the commercial flights are allowed over the area. There are also many small planes in the area (close to Arlington Airport), and seaplanes that land frequently on Lake Goodwin.

**YOU MUST RAISE THE MINIMUM ALTITUDE OVER THE LAKE GOODWIN AREA TO 10,000 FEET IF THESE FLIGHTS ARE TO COMMENCE; AND HOPEFULLY THEY WILL BE USING THE NEW GPS GUIDANCE SYSTEM.**

You are invited to come see this beautiful area that is about to be ruined by this decision. A foolish decision that will only benefit a few people. Let those few move closer to SeaTac if they cannot stand to drive there, or they can use the Airport Shuttle, the bus, etc.

This will also have a very negative effect on the cities of Mukilteo and Everett; more crime, more cheap hotels, pot shops, more drugs and prostitution, traffic congestion, look at the SeaTac area for proof.

Kathleen Prevette 15030 39<sup>th</sup> Avenue NW, Stanwood WA 98292

360 652 7374

[k.prevette@frontier.com](mailto:k.prevette@frontier.com)

cc: Mayor of Mukilteo, Mayor of Everett, Snohomish County Development and others.

Kathleen L. Prevette  
PO Box 638  
Stanwood, WA 98292

*Copy*

F Y I

P171

*re: Envir. Science Assoc.  
Paine Field Supp. EA*

P171

**Kathy Prevette**

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**From:** "Wray, Marty" <Marty.Wray@co.snohomish.wa.us>  
**To:** <k.prevette@frontier.com>  
**Sent:** Wednesday, February 27, 2013 11:35 AM  
**Subject:** noise complaints

Dear Kathleen,

I apologize for not being able to contact you sooner. I assure you that we follow up on all noise calls regardless of whether they are in our airspace at Paine Field or not. We experienced a fiber optic failure yesterday and I was unable to track via radar to determine the type, altitude etc. of the aircraft you enquired about. In addition we had no email or internet yesterday. I did call you but there was no one at the phone number provided.

I have this morning completed my investigation as to the aircraft you have described and have some information for you. I have also included some links for further contact to the FAA to voice any concerns you may have and some links to better understand traffic patterns and operations here at Paine Field Airport.

Feb. 24<sup>th</sup> @ 4:29pm:

LCF 747-400 arriving at Paine Field for parts delivery to Everett Boeing assembly plant. The aircraft was tracked at 2,894' adjacent to your address above ground level (AGL).

Feb. 26<sup>th</sup> @ 6:10pm.:

Boeing 777-300 on test flight from Portland airport arriving at Paine Field. Unable to radar track via Flightgraph but Flightaware graph indicates 4,200' @ 6:10pm.

Your address indicates you're approximately 13 miles from the Paine Field Airport runway 16R approach path. These aircraft are intercepting the instrument landing system at Paine Field for landing on runway 16R. Typically they intercept this navigation signal anywhere from 10-15 miles out from the airport and turn inbound at that point. The aircraft inbound are in contact with either TRACON approach control in Seattle or Paine Field ATC controllers. The Paine Field Delta airspace is a cylindrical area extends from the surface to 2,500 feet AGL. It is individually tailored for each airport but typically extends out 4 Nautical Miles from the primary airport.

The flight paths are determined by the runway location, and the direction of flight operations are dictated by the prevailing winds, opposite direction traffic and air traffic controller instructions. In most cases the aircraft are abiding by the prescribed standard arrival and departure procedures as instructed by the FAA and the control tower. There is not the option for re-routing traffic over different neighborhoods as the flight path is directly related to the location of the runway.

In the event that the aircraft is not abiding by FAA standards, we take steps to contact aircraft operators to discuss further. The Airport management has meetings with Tenants, businesses, museums and aircraft operators located on the airfield to discuss flight operations and noise complaints. We do also discuss what can be done to discourage late night operations, low altitude operations, and early morning flights, to make sure that flight departments are aware of the community reaction to those flights. ✓

The airport is limited to the authority we have over specific flight operations, we are mainly charged with ground operations here at the airport. Aircraft are responsible to use the airfield in compliance with both the standards set forth in the Federal Aviation Regulations, and the direction given to them by the air traffic controllers. However, we do make contact with the aircraft operators to let them know about the community feedback to certain flight operations and what they should be doing to minimize noise by adhering to Paine Field's voluntary noise abatement procedures when possible. The pilot's are normally very receptive to this feedback.

3/3/2013

**P171**

Our department has quarterly meetings with Boeing, ATS and other businesses on the airfield to discuss their flight operations and noise complaints. We also discuss what can be done to discourage late night/early morning operations and make sure that upper management and flight departments are aware of the community reaction to those flights.

Here's some links:

<http://www.portseattle.org/Environmental/Noise/Noise-Abatement/Pages/Aircraft-Monitoring-System.aspx>

[www.paineairport.com](http://www.paineairport.com)

<http://www.paineairport.com/noiseform.aspx>

[http://www.paineairport.com/pf\\_pdf/Paine%20Field%20NEMU%20PDF.pdf](http://www.paineairport.com/pf_pdf/Paine%20Field%20NEMU%20PDF.pdf)  
(page 12 depicts flight patterns)

The following link is to the FSDO office for the FAA.

[http://www.faa.gov/about/office\\_org/field\\_offices/fsdo/sea/](http://www.faa.gov/about/office_org/field_offices/fsdo/sea/)

If you have any questions about this or any other concern, please feel free to contact me so I may be of assistance.

Marty Wray  
Operations Specialist  
Paine Field Airport  
3220 100th Street S.W. Suite A  
Everett Wa. 98204  
(425) 388-5113



# PAINE FIELD

P171

3220 - 100TH STREET S.W., SUITE A  
EVERETT, WASHINGTON 98204

COUNTY EXECUTIVE  
Willis D. Tucker

(206) 353-2110  
FAX 355-9883  
AIRPORT MANAGER  
Don Bakken AAE

January 28, 1991

Mr. Tom Prevett  
P.O. Box 638  
Stanwood, WA 98292

Dear Tom:

This letter responds to your complaint this morning regarding an aircraft you perceived to be too low over Lake Goodwin while landing at Paine Field at 3:00 p.m. on 1/26/91.

The aircraft in question was a Thai Airways 747-400 making an ILS (Instrument Landing System) approach to Runway 16R at Paine Field. I have spoken with the FAA Air Traffic Controller on duty at the time and a Boeing pilot who discussed your complaint with a pilot on the flight in question. I have been assured by both that the aircraft was on a normal ILS approach at or above 3000' above sea level (MSL) in the Lake Goodwin area. I have attached copies of the Runway 16R ILS and 16R NDB (Non Directional Beacon) approach plates which we discussed. You can see that Lake Goodwin lies right under the procedure turn to the final approach path. Note the altitude is 3000' MSL on the ILS approach and 2000' MSL on the NDB approach when crossing our outer marker (RITTS) at Mission Beach. As I mentioned to you, our outer marker is located so far north because Mission Beach is the closest land surface on the approach course.

I was reminded by the Boeing test pilot that their pilots make every effort to minimize noise impacts on our neighbors and that the multiple redundant systems in the aircraft cockpit make it practically impossible for the aircraft to go below 2500' MSL over Lake Goodwin on our ILS approach without all kinds of annoying alarms going off. These alarms did not go off on the flight in question.

Sincerely,

William Dolan  
Airport Aviation Supervisor

WD/ka

Encl/2

cc: Production Flight Test  
FAA Tower



U.S. Department  
of Transportation  
**Federal Aviation  
Administration**

**P171**

Flight Standards District Office  
1601 Lind Avenue Southwest  
Renton, Washington 98055

March 12, 1991

Ms. Kathleen Prevette  
15030 39th Avenue NW  
P.O. Box 638  
Stanwood, WA 98292

Dear Ms. Prevette:

I regret that you were unable to meet with us today to discuss your complaint of low-flying jet aircraft near your residence.

Since this office is tasked with the investigation of incidents which affect aviation safety or violations of the Federal Aviation Regulations (FARs), I suggest that, in the future, you contact Mr. Mitch Barker, FAA Public Affairs, (206) 227-2807. He will be able to work with you and direct some of your questions to the appropriate personnel. I will gladly provide him all of your correspondence as well as the information I have gathered.

If you would like to reschedule a meeting with me, along with someone from our Air Traffic office, please don't hesitate to call me at (206) 227-2574.

Sincerely,

Candace C. Carrera  
Aviation Safety Inspector

*\*I started a full time job  
so couldn't meet with her.*

US Department of Transportation  
Federal Aviation Administration  
Flight Standards District Office  
1601 Lind Avenue, S.W.  
Renton, WA 98055-4056

Attn: Candace C. Carrera  
Aviation Safety Inspector

Re: Low Flying Jets over  
Lake Goodwin area  
Stanwood, Washington  
Kathleen Prevette

Dear Ms Carrera

Thank you for your response to my complaint about low flying jets and extremely loud noise pollution from them over my home.

The situation is still intolerable. On Tuesday July 31 at 7:10 pm a large silver jet with red markings (large stripe on the back section) went over my home extremely low, 30 seconds later a small plane headed West went over at approximately the same altitude - very frightening.

On Thursday August 2, the morning was especially bad with low noisy flights flying constantly from 7:30 am, at 10:45 am a huge silver 747 flew over extremely low. It was so low and loud it frightened an 11 year old house guest staying with me very badly. A small plane flew over less than 10 seconds later in the same area. I called Boeing Field to report this one (the low jet) and talked to Mr. Dan Simms. He confirmed that it was a 747, but said he didn't know the exact altitude when it was over my house. He said 1000 feet was the height restriction here and confirmed that this is a "congested area". When I talked to a gentlemen in your office (I didn't get his name) on my first call to you he said the height over this area should be 3000 feet not 1000 feet. If these 747's etc. are at 1000 feet then it is much too low. There is no reason for them to be that low this far from their landing field! Mr. Simms said he has had other complaints from this area also.

This is not an area of new homes. Many of the homes here have been on the lake for 40 or 50 years or more. Ours has been here since 1969. These low flying jets are a recent problem. We did not move into their territory, they moved into ours!!!

On Friday, August 3, a jet was so loud that I believe it could cause EAR DAMAGE! That was at 10:10 am.

On August 10, 8:30 am another extremely low jet went over, from 9:00 to 9:15 lots of noise, very loud. At 3:35 pm another went over very low and I got pictures of it. (pictures enclosed).

On Saturday August 11, a very low jet at about 2:30 pm went over, on Sunday August 12, at 1:20 pm another (2 engine, very low, very loud).

On Tuesday August 14, at 12:33 extremely loud and low, I also got a picture of this one (enclosed).

Page 2

I don't think the people responsible for these low flying jets realize the gravity of the situation here. The small craft traffic from Arlington Airport and float planes landing on the lake etc. make it extremely dangerous for these jets to be at these low altitudes. They also don't realize how completely disruptive this is to the people and wildlife living here.

I will organize a community action and get a list of signatures on a complaint if that is necessary. This dangerous situation must be changed!! These jets must be forced to fly higher or in a different area altogether!!

PLEASE, these jets must be higher or rerouted!!

1000 feet is not high enough for these jets in this area. Good grief, I can fly a kite at 1000 feet. If these jets I have taken pictures of are at 3000 feet, then that is too low. The noise and danger are unbearable!

I have enclosed a picture of two beautiful eagles flying over my home to remind you of one of the reasons I am writing to you.

Is it possible to have one of your investigators come and see this impossible situation in person? I believe it is the only way to understand the extreme noise and danger of mid-air collision here.

Hoping to hear from you soon, I remain....

"Frightened on Lake Goodwin"



Kathleen Prevette  
15030 39th Ave NW  
Starwood, WA 98292

Encl.



U.S. Department  
of Transportation  
Federal Aviation  
Administration

P171

Flight Standards District Office  
1601 Lind Avenue Southwest  
Renton, Washington 98055

October 10, 1990

Ms. Kathleen Prevette  
15030 39th Avenue NW  
Stanwood, WA 98292

Dear Ms. Prevette:

In response to your letter dated June 22, 1990, we have investigated your complaint of low flying jet aircraft near your residence.

The location of your residence is approximately 12 miles from the center of the Snohomish County (Paine Field) Airport, Everett, Washington. The approach path for aircraft landing to the south and the departure path, for those departing to the north, is almost directly aligned with the Lake Goodwin area. The minimum Air Traffic Control (ATC) radar vectoring altitude for that area, within a 10-mile radius is 3000 feet above sea level. This means that these jet type aircraft are not allowed below this altitude in your area.

With the help of Federal Aviation Administration (FAA) ATC, we were able to track and identify specific aircraft at the locations and times that you had documented. At no time did we locate any of these aircraft at altitudes of less than 3100 feet above sea level. Most aircraft were found to be significantly higher than the minimum radar vectoring altitude of 3000 feet. I have enclosed for your reference a copy of the Aviation Sectional and Aeronautical Chart with which you can note the location of your residence and the proximity of the airport. The FAA is tasked with the investigation of incidents which affect aviation safety or are in violation of the Federal Aviation Regulations (FARs). We do not have the authority to investigate noise complaints. We suggest that you may wish to contact the operator of the Snohomish County Airport with your concerns. Their address is 3220 100th Street SW, Everett, Washington 98204.

Sincerely,

Candace C. Carrera  
Aviation Safety Inspector

Enclosures



## PAINE FIELD

3220 - 100TH STREET S.W., SUITE A  
EVERETT, WASHINGTON 98204

COUNTY EXECUTIVE  
Willis D. Tucker

**P171**

(206) 353-2110  
FAX 355-9883

AIRPORT MANAGER  
Don Bakken AAE

January 28, 1991

Mr. Tom Prevett  
P.O. Box 638  
Stanwood, WA 98292

Dear Tom:

This letter responds to your complaint this morning regarding an aircraft you perceived to be too low over Lake Goodwin while landing at Paine Field at 3:00 p.m. on 1/26/91.

The aircraft in question was a Thai Airways 747-400 making an ILS (Instrument Landing System) approach to Runway 16R at Paine Field. I have spoken with the FAA Air Traffic Controller on duty at the time and a Boeing pilot who discussed your complaint with a pilot on the flight in question. I have been assured by both that the aircraft was on a normal ILS approach at or above 3000' above sea level (MSL) in the Lake Goodwin area. I have attached copies of the Runway 16R ILS and 16R NDB (Non Directional Beacon) approach plates which we discussed. You can see that Lake Goodwin lies right under the procedure turn to the final approach path. Note the altitude is 3000' MSL on the ILS approach and 2000' MSL on the NDB approach when crossing our outer marker (RITTS) at Mission Beach. As I mentioned to you, our outer marker is located so far north because Mission Beach is the closest land surface on the approach course.

I was reminded by the Boeing test pilot that their pilots make every effort to minimize noise impacts on our neighbors and that the multiple redundant systems in the aircraft cockpit make it practically impossible for the aircraft to go below 2500' MSL over Lake Goodwin on our ILS approach without all kinds of annoying alarms going off. These alarms did not go off on the flight in question.

Sincerely,

William Dolan  
Airport Aviation Supervisor

WD/ka

Encl/2

cc: Production Flight Test  
FAA Tower

# Paine 'alternative' finding few friends

## Hearings due on regional airport future

By **JIM MUHLSTEIN**  
Herald Writer

After an hour of explaining his fears about noise, traffic and everything else he found wrong with a proposal to create the region's next major airport less than a mile from his house, Patrick Donnelly realized one word said enough.

"Unacceptable," the Harbour Pointe resident said this week. "The whole idea is unacceptable."

The target of Donnelly's complaint is the "preferred alternative" of a panel seeking a solution to the crush of planes and passengers using Seattle-Tacoma International Airport.

The Puget Sound Air Transportation Committee's preference is to begin shifting an average of 50 flights a day from Sea-Tac to the Snohomish County Airport by the year 2000.

Sea-Tac would gain another runway in the plan. A search would also begin in Pierce and Thurston counties for a third regional airport site, though it is not expected to be needed before 2010.

The committee has scheduled two hearings in Snohomish County on the draft environmental impact statement with the proposals, the first from noon to 4 p.m. Saturday at Everett Civic Auditorium, 2415 Colby Ave.

A second hearing is slated for 6-10 p.m. Feb. 12 at the Arlington High School auditorium.

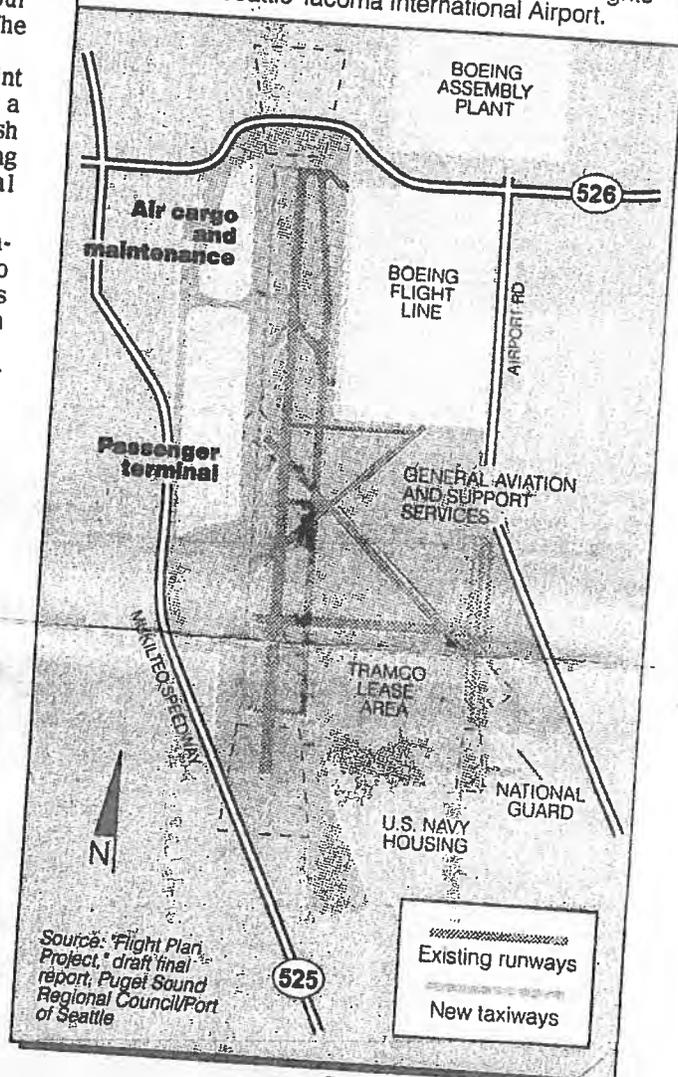
The Flight Plan Project, as it is called, was begun more than two years ago and is sponsored by the Port of Seattle and the Puget Sound Regional Council.

~~\_\_\_\_\_~~  
~~\_\_\_\_\_~~

See **PAINE**,  
back page, this section

### THE "NEW" SNOHOMISH COUNTY AIRPORT?

Consultants looking at possible sites for the region's next major airport give top marks to creating what some critics dub "Sea-Tac North." The proposal is to add passenger and cargo facilities at the Snohomish County Airport at Paine Field and divert flights there from Seattle-Tacoma International Airport.



The Herald/**JUDY STANLEY**

'LEARY  
iod.

# PAINE

from Page 1

matter, are waiting for the committee to present the agencies with a final recommendation in April.

This week, the Mill Creek and Mukilteo city councils took stands against expanding Paine. Mukilteo also canceled membership in the Snohomish County Economic Development Council to protest business support of the plan.

Snohomish County Executive Bob Drewel and county council members also have objected to expanding the county airport. The Everett City Council, whose domain includes the airport's biggest tenant, Boeing Co., has not taken a position.

Just in case the preferred alternative doesn't fly, the committee is offering a mix of "secondary alternatives." They include establishing a regional airport at Arlington, McChord Air Force Base, Fort Lewis, or at one of several sites near Olympia and in central Pierce County.

At Arlington, the scenario might include lengthening the municipal airport's existing runway and building a second landing strip.

If neither Paine Field nor Sea-Tac is allowed to expand, a total of two new regional airports would be needed, according to the alternatives laid out by the committee.

Project co-manager Peter Beaulieu of the Puget Sound Regional Council said the committee wants to hear reaction to all of the alternatives, not only those affecting Paine Field or Arlington.

"There are no good sites," Beaulieu said. "The committee recognized that all the sites are bad, that all the sites are painful."

"But no matter where we go, if we go to Sea-Tac or Pierce County or elsewhere, the question is the same: What do we do if people want to keep buying airline tickets a year from now or 10 years from now?"

"It's not a problem limited to any single community."

## Airport options considered

Although turning Paine Field into a regional airport is its preferred choice, the Puget Sound Air Transportation Committee offers these "secondary alternatives."

### NO PAINE FIELD EXPANSION:

- Lengthen Arlington Municipal Airport's runway and add a runway to Seattle-Tacoma International Airport.
- Build a runway for commercial aircraft at a central Pierce County site and another runway at Sea-Tac.

### NO NEW SEA-TAC RUNWAY:

- Convert Paine and a central Pierce County site into supplemental airports.

### NO PAINE AND SEA-TAC EXPANSION:

- Create two commercial runways at Arlington.
- Supplemental airports at Arlington and central Pierce County with one commercial runway each.
- Supplemental airports at Arlington and an Olympia-Black Lake site with one commercial runway each.

When the Trapps bought their home, they were aware of the airport, but they also knew of the 1978 agreement and that it was supposed to keep aviation in check. The uncertainty now bothers them most of all, she said.

"We want to do things to the house, but we're scared," said Trapp, vowing to move if airlines come to Paine. "It's getting to the point we're afraid to put in a rhododendron. I see everything going 'poof' at the hands of a bunch of people in Seattle."

Liz McLaughlin, the county council's acting chairwoman, declared the county will stick by its pact with the Paine Field community.

"We own and operate the airport. The Port of Seattle doesn't," McLaughlin said. "I think the Port of Seattle sees politically they can't put an independent runway at Sea-Tac, and they want us to share the pain at Paine. I'm not for sharing pain."

McLaughlin was one of a handful of transportation committee members who voted against making Paine Field a Sea-Tac backup. Sen. Larry Vognild, D-Everett, was one of the few Snohomish County members who did.

Vognild said two factors persuaded

him: cost and noise.

"What it boiled down to for me was this; can we ask the people in this state to spend literally billions of dollars to build a totally new airport when the facilities we already have can be used?"

As for the increase in aircraft noise, Vognild said he believes the problem won't be as bad as most people fear. By the time Paine Field is needed eight years from now, federal law will require much quieter engines on commercial jets, the senator said.

"I'm not going to say there won't be any noise impacts, but I honestly believe it will have a minimal impact on people around the airport," he added.

Vognild cautioned that making Paine Field a regional airport would depend on adding a new runway at Sea-Tac.

"The (preferred) alternative calls for both to be done simultaneously," Vognild said. "It won't be a matter of shifting heavy traffic to Paine and then fighting about building a new runway at Sea-Tac. If they don't build the runway, they can't use Paine."

Vognild said it was a tough decision and one that may have political repercussions for him.

"But when I looked at all the



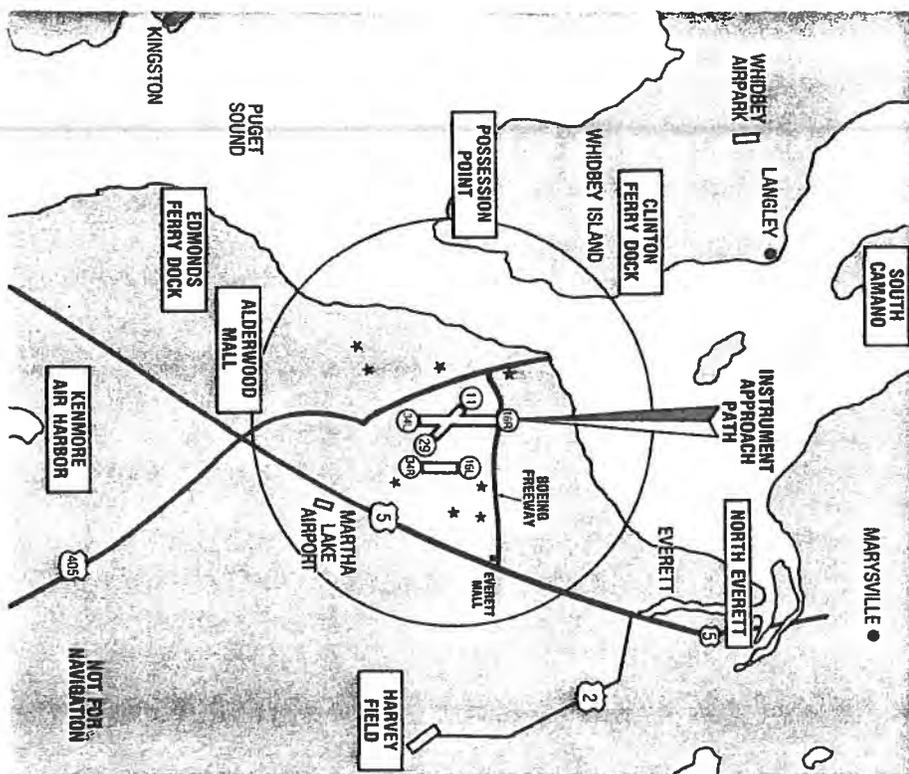




MARCH  
1990

**PAINE FIELD/SNOHOMISH COUNTY AIRPORT**

**TRAFFIC AREA MAP**



**ENTER THE ATA AT OR ABOVE  
1600' MSL**

**AIRPORTS**  
**REPORTING POINTS**  
**SCHOOLS**



Creative Printing Everett WA

**L A R G E - A I R C R A F T**

**The Following Businesses and Services are Located  
at Paine Field to Serve Your Aviation Needs**

NAME	RAMP LOCATION	BLDG NUMBER	PHONE	FREQUENCY
Airport Fire Dept.	South	Bldg 219	353-1606	
Airport Maintenance Dept.	South	Bldg 219	353-1607	
Airport Manager's Office	Terminal	Bldg C-1	353-2110	
Aircraft Radio Service	Central	Bldg C-51-1	353-4242	
Aviation Careers	Central	Bldg C-3	355-4392	
AvPrep	Central	Bldg C-57	355-1616	
Crown Aviation	East	Bldg C-14	355-4088	
FAA Control Tower	Terminal	Next to C-1	353-0414	
Fliteline Service - Chevron Fuel	Terminal	Bldg C-2	355-6600	122.95 (Unicom)
Geneva Aviation	North	Bldg C-72	743-3000	
Jet Deck Restaurant	Central	Bldg C-57	743-9500	
International Air Fair Office	Terminal	Bldg C-1	355-2266	
Museum of Flight	North	Bldg C-72	353-1345	
Paine Field Instrument Shop	Terminal	Bldg C-1	353-8611	
Precision Air-Motive	Terminal	Bldg C-1	353-8181	
Regal Air	Central	Bldg C-51-3	743-9123	
Sunwest Aviation	Central	Bldg C-51-3	355-4516	
Ted's Aircraft Sales	Central	Bldg C-57	745-0168	
Thunderbird Maintenance	Central	Bldg C-64-8	742-8222	
Thunderbird Aero Enterprises - Texaco Fuel	Central	Bldg C-51-2	353-4949	123.3 (Flt. Sch.)
Tramco Main Hangar #1	South	Bldg 208	347-3030	123.375 (Unicom)

**Seattle FSS 1-800-992-7433**  
**Paine Field ATIS 355-9797**

**U.S. Customs 259-0246**  
**Boeing Tour Center 342-4801**  
**Civil Air Patrol 353-6310**

Additional copies of Noise Abatement Procedures are available at FBO's or the Airport Office.

# Snohomish County Airport

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## Paine Field PAE

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### Frequencies

	VHF	UHF
Tower	121.3/120.2*	229.4
Ground	121.8	242.1
Sea. Ctr.	128.5	306.9
ATIS	128.65	387.0
Ramp	122.85	
VOR/DME	114.2	
ILS	109.3	
FSS (Seattle Radio)	122.55	

\* Primary/Secondary

### Runways

- 16R-34L    9010'x150' HIRL
  - 11-29      4514'x75' MIRL
  - 16L-34R    3000'x75' MIRL
- Acft. over **250 h.p.** use only **16R-34L**  
**16L-34R and 11-29 are closed**  
**when tower is closed**

### General

Elev. 606'    TPA 1600'  
 N47 54.5 W122 16.8'  
 Variation 20° East  
 Services – Major & Minor  
 Tower hours 0700-2100 (local)  
 Fuel 80/87 100/130 Jet A-B

## JET, TURBOPROP, AND LARGE PROPELLER AIRCRAFT

*Noise Abatement Procedures  
Unless Directed Otherwise by ATC*

### A. USE RWY 16R/34L.

Repetitive training flights are discouraged.

### B. APPROACHES

1. **Standard NBAA noise abatement** procedures should be used.
2. **Practice IFR approaches** during visual meteorological conditions.
  - a. **Circle to land** maneuvers are **discouraged**.
  - b. **Missed** approaches should maintain **runway heading to 3000'**.
3. **VFR Approaches**
  - a. **Downwinds** should be flown **mid-channel**.
  - b. **RWY 16R** make **turn to final North of shoreline**.
  - c. **Fly final** at or above **ILS glide slope or VASI**.
  - d. **Straight in – maintain** at or above **2000' MSL until intercepting ILS glide slope or VASI**.

### C. DEPARTURES (IFR and VFR)

1. **No intersection takeoffs**
2. **Standard NBAA noise abatement** procedures
3. **RWY 34L – avoid turns before** reaching the shoreline.
4. **RWY 16R – avoid turns** until reaching **3000' MSL**.

## ROTARY WING AIRCRAFT

### A. MILITARY

Copies of military procedure are available from the U.S. Army Reserve, Aviation Support Facility.

### B. CIVILIAN HELICOPTERS

Use the helipad shown on the map unless directed otherwise by ATC.

L  
A  
R  
G  
E  
  
A  
I  
R  
C  
R  
A  
F  
T

# CORRECTED FIGURE 10

The original Figure 10 in the PSATC Draft Final Report (pg. 33) contains an error in the Total Emissions of both CO and NOX for the Paine Field site. The correct figures are presented below and are highlighted with a box. The original Figure listed CO at 5 tons/day and NOX at .1 tons/day for both the one and two runway scenarios. We apologize for any inconvenience this may have caused.

## FIGURE 10

### Site Options Data Summary

SITES	OPERATIONAL/TECHNICAL			ECONOMIC/FINANCIAL				ENVIRONMENTAL				
	RUNWAY CAPACITY	AIRSPACE	ACCESS (%FOI) IN	CAPITAL COSTS	DELAY COSTS	FUNDS/COST	ECONOMIC IMPACTS	LANDS POP YR 2000	TOTAL EMISSIONS (TONS/DAY)		WETLANDS (ACRES)	SALMON STREAMS (FEET)
	(OPS)	(RANK)	60 MIH)	(\$MILLIONS)	(\$MILLIONS)	(RATIO)	(RANK)	(THOU FOI)	CO	NOX	Working Paper 13	Working Paper 13
	Working Paper 7	Working Paper 7	Working Paper 8	Working Paper 11	Working Paper 11	Working Paper 11	Working Paper 8	Working Paper 12A	Working Paper 12B	Working Paper 12B	Working Paper 13	Working Paper 13
<b>SEA-TAC</b>												
Existing with Dem. Mgt.	380,000	2	79	230	4,900	4	2	7	48	10	0	0
New Air Center Runway	480,000	2	79	818	1,500 - 2,900	2.8-3.1	2	118-130	25-38	8-8	0	0
<b>AFB INGTON</b>												
One Runway	250,000	2	14	156-252	30-50	0.8-1.4	3	0-107	3	1	0	0
Two Runways	900,000	2	14	201-358	30-50	0.7-1.1	3	0-05	3	2	0	0
<b>McCHORD AFB</b>												
One Runway	250,000	4	39	138-263	30-50	15	2	0-108	2	1	2	0
Two Runways	250,000	9	39	170-284	30-50	1.1-1.4	2	0-108	2	1	2	0
<b>PAINFIELD</b>												
One Runway	250,000	3	46	427-549	20-50	0.4-0.7	3	0-112	2	1	35	0
Two Runways	900,000	8	46	923-845	20-50	0.4-0.8	3	0-113	2	1	35	0
<b>CENTRAL PIERCE</b>												
One Runway	250,000	4	34	319-415	30-50	0.7-1.0	1	0-05	3	1	0	0
Two Runways	900,000	8	34	542-698	20-50	0.4-0.8	1	0-05	3	1	3	0
Three Runways	750,000	2	34	2078	1,600	13	2	28	78	18	28	0
<b>OLYMPIA/BLACK LAKE</b>												
One Runway	250,000	1	22	314-433	30-50	0.4-0.9	2	0-01	11	2	0	2,000
Two Runways	800,000	1	22	364-625	30-50	0.4-0.7	2	0-01	13	3	36	7,000
Three Runways	750,000	1	22	1809	1,600	15	3	03	85	17	81	21,600
<b>FT. LEWIS</b>												
Three Runways	750,000	4	34	1564	1,600	18	2	13	78	18	0	4,000

Powered by  
**WebMD**

Heart

## Tools and Resources

[Cardiovascular Health Assessment](#)

[Men's Health Assessment](#)

[Women's Health Assessment](#)

[WebMD Symptom Checker](#)

[My Health Assistant](#)

**WebMD**

**P171**

## Chronic Exposure to Airplane Noise May Harm Heart ✓

Levels of heart disease, stroke rose along with exposure, researchers say

By Robert Preidt

*HealthDay Reporter*

WEDNESDAY, Oct. 9 (HealthDay News) -- People who put up with the constant roar of aircraft overhead may be at higher risk for heart disease, two new studies suggest.

In one study, British researchers compared rates of stroke and heart disease among 3.6 million people who lived near London's sprawling Heathrow airport, one of the busiest transit hubs in the world.

The results showed that these people were at heightened risk for death and hospitalization from heart issues. The risk was highest among the 2 percent of the study population exposed to the highest daytime and night-time levels of aircraft noise, the team said.

In the second study, researchers analyzed data from more than 6 million people aged 65 and older who lived near 89 U.S. airports during 2009. On average, people who lived in zip codes with 10 decibel higher levels of aircraft noise had a 3.5 percent higher rate of hospitalization for heart disease.

As in the British study, the association between hospitalization for cardiovascular disease and aircraft noise was strongest among people exposed to the highest levels of aircraft noise, say researchers led by Dr. Francesa Dominici of the Harvard School of Public Health.

Heart experts weren't surprised by the findings.

"Despite the thought that perhaps aircraft noise might [only] be a cause of sleep disturbances -- of being disruptive or a mere irritation -- these studies are showing the real health threat of airport noise," said Dr. Suzanne Steinbaum, a preventive cardiologist at Lenox Hill Hospital in New York City.

"Certainly this information should become an important issue when deciding where to live, or in city planning for the future," she said.

Dr. Sripal Bangalore, a cardiologist at NYU Langone Medical Center in New York City, said the new research "adds to growing literature on environmental-related risk factors for cardiovascular disease."

"One is left to wonder whether aircraft technicians, maintenance personnel and ground crews who are not only at risk of job-related hearing loss, are also at high risk of cardiovascular disease," said Bangalore, who is also assistant professor in department of medicine at NYU.

The authors of the British study said that cities like London are under enormous pressure to meet the demands of the airline industry. "However, policy decisions need to take account of potential health-related concerns, including possible effects of environmental noise on cardiovascular health," wrote a team led by Paul Elliott of Imperial College London.

Both studies were published online Oct. 8 in the journal *BMJ.com*. While the studies showed an association between chronic exposure to aircraft noise and heart trouble, they were observational in nature and could not prove a cause-and-effect relationship.

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## Response to Comment

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Dear Kathleen Prevette:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### **General Responses**

2-4: Aircraft Currently Fly Low and Very Close to Houses

3-6: What Are the Existing and Future Noise Impacts?

3-8: What Are the Health Effects of Noise?

6-2: What is the Impact on Property Values?

6-3: What is the Impact of the Proposed Action On Crime?

6-5: What is the Impact on Wildlife?

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10/29/18

Re: Paine Field Supplemental EA

Our family opposes additional flights from Paine Field.

We live in the clearview area - 180<sup>th</sup> ST SE and Highway 9.

We already have multiple commercial flights over our area - home from flights to & from Seattle.

PLEASE NO MORE flights!

Thank you for allowing public comment.

BOBBARA HAWKINS  
P.O. BOX 1358  
SNODHISH WASHINGTON  
98291-1358

---

## Response to Comment

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Dear Barbara Hawkins:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general response that applies to your comments.

### **General Response**

2-1: Why Can't the County Limit or Restrict Operations?

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TO: Environmental Science Associates, Paine Field Supplemental EA  
5309 Shilshole Ave NW, Suite 200,  
Seattle, Washington 98107

Regarding Propeller Airports LLC Paine Field Terminal:

Boeing has been expanding production but has struggled to find ramp space for overflow aircraft production at Paine Field. This started when Paine Field temporarily closed runway 11-29 to provide additional ramp space for 787 overflow production. The runway closure was extended to 747 overflow production due to engine delays. Runway 11-29 was then permanently closed after Boeing needed more ramp space for KC-46 tanker overflow production. It should be noted that Boeing had previously expanded onto the same ramp space as the new passenger terminal is now located.

With Paine Field ramp space so limited, how can a small 2-gate terminal accommodate 48 new daily airline operations with weather delays, ATC delays, mechanical delays, late arrivals, late departures and the many other unforeseen delays without requiring overflow ramp space? Such delays will cause a "rippling effect" with no overflow ramp space to park passenger jets. When airliners at Paine Field stack-up on-the-ground and in-the-air, won't this affect passengers directly in negative ways?

In addition, with the 2-gate limitation, how can Propeller Airports LLC handle peak-loads at peak-travel-times (e.g. 7:00 to 10:00 AM and 4:00 to 7:00 PM)? We must consider that most other regional airport terminals support from 6 to 8 gates to handle such peak-loads.

Given ramp space and gate limitations at Paine Field, we recommend that Propeller Airports LLC operate with 24 total daily operations (12 turnarounds) instead of 48 daily operations (24 turnarounds) as was originally requested for regional service at Paine Field. We would also like to point out that Propeller Airports LLC has absolutely no prior experience operating a "live" airport terminal.

John Rotunda



13909 59<sup>th</sup> Ave SE

Everett, Washington 98208

Long time Everett Resident, Boeing, Pilot, Paine Field Tenant, Aviation Expert

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## Response to Comment

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Dear John Rotunda:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following individual response that applies to your comments.

### **Available Ramp Space**

The airlines developed their gate schedules based on each airline's individual operating parameters. The proposed operational levels are consistent with the expected throughput of the terminal and availability of aircraft parking. It is a business decision of the airlines to reduce their frequency of use based on the ability to operate with an acceptable level of delay.

Additionally, the Airport is aware that there are airfield constraints, particularly during weather events and other anomalies, and is considering areas with available space to be temporarily used to accommodate aircraft as necessary.

Regarding the suggestion to limit operations, as detailed in General Response 2-1, the County is not allowed to limit or restrict operations at Paine Field because it is a public use airport that has accepted Federal funding. 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)). As a result of these grant assurances, the Airlines and Propeller cannot be restricted to 12 operations.

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October 29, 2018

Subject: Paine Field Expansion

I would like to make a comment on the projected Air Traffic to and from Paine Field.

Attached is a copy of a Radar Vector Patterns as projected by N.A.C. Ltd.

Attached also are copies of Figures F-1 and F-2 from Appendix F – Noise, depicting arrivals and departures to and from Paine Field. These are from the 2018 Draft Supplemental Environmental Assessment documents as found on the web site: <https://www.paineairport.com>

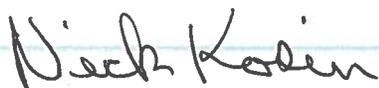
Figures F-1 and F-2 DO NOT SHOW the land areas of the flight patterns AFTER leaving or arriving into Paine Field. Why this was not done I do not know, but as shown on the Radar Vector Patterns the southern flights (San Francisco, Sacramento, and Los Angeles) travel over Kitsap County where I reside.

I reside in Manchester Community and would like to state that the jets that DO fly over my area DO MAKE NOISE and to know there could be a lot more of them (20 maybe daily) flying over Kitsap County is of MUCH concern as we enjoy the relative quiet of Kitsap County. The flight patterns projected are going over smaller communities which you folks probably thought would not complain or you figured you could sneak this proposal by without them knowing or even involving them. I don't think Bainbridge Islanders would appreciate more air noise!! A mile up is not that high and noise travels well on our side!

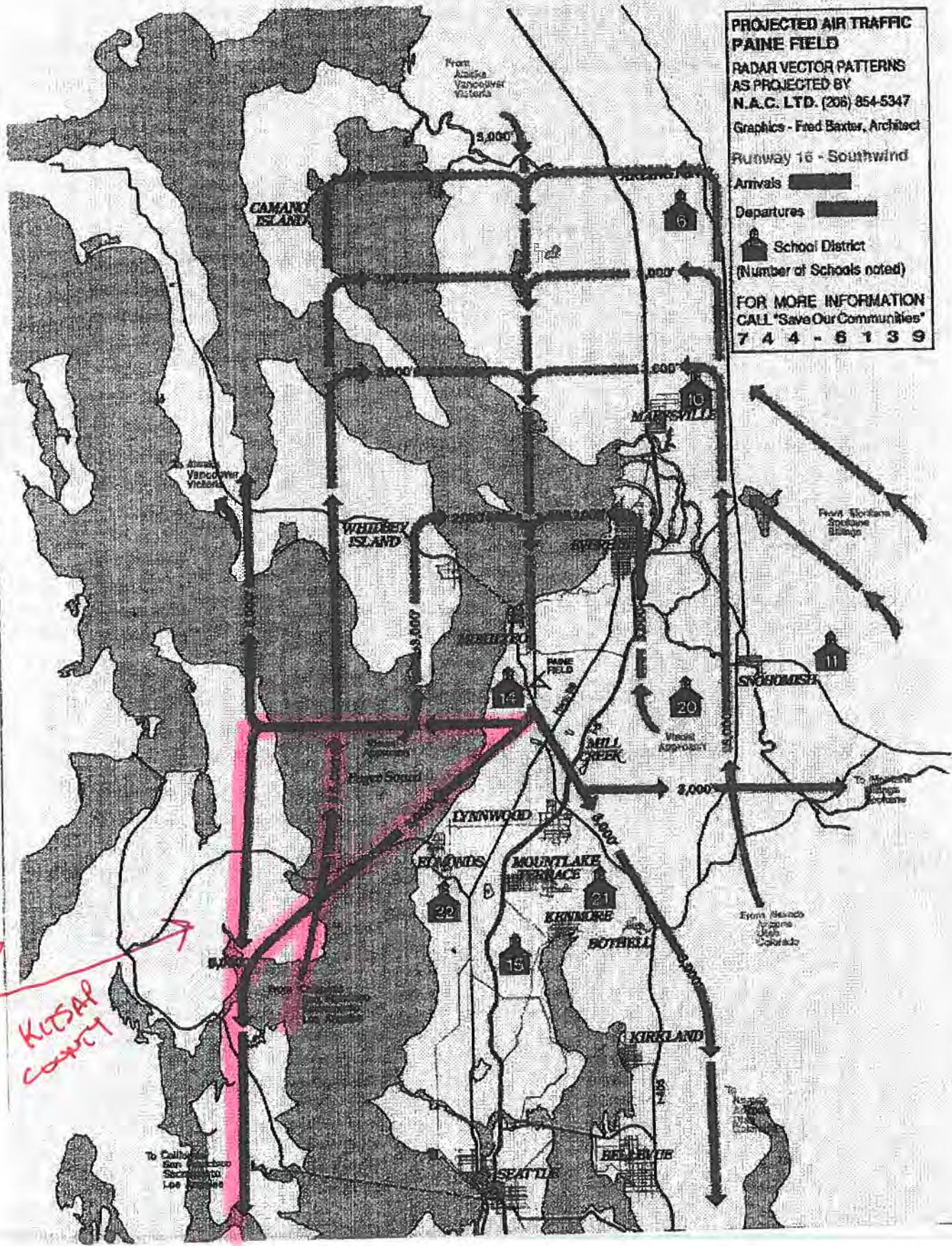
I object to the proposed commercial air service into and out of Paine Field. To the people who live in Everett and north of it that complain getting to SeaTac is hard, then they need to spend the night before at SeaTac to ensure they do not miss their flights! Simple as that.

Thank you.

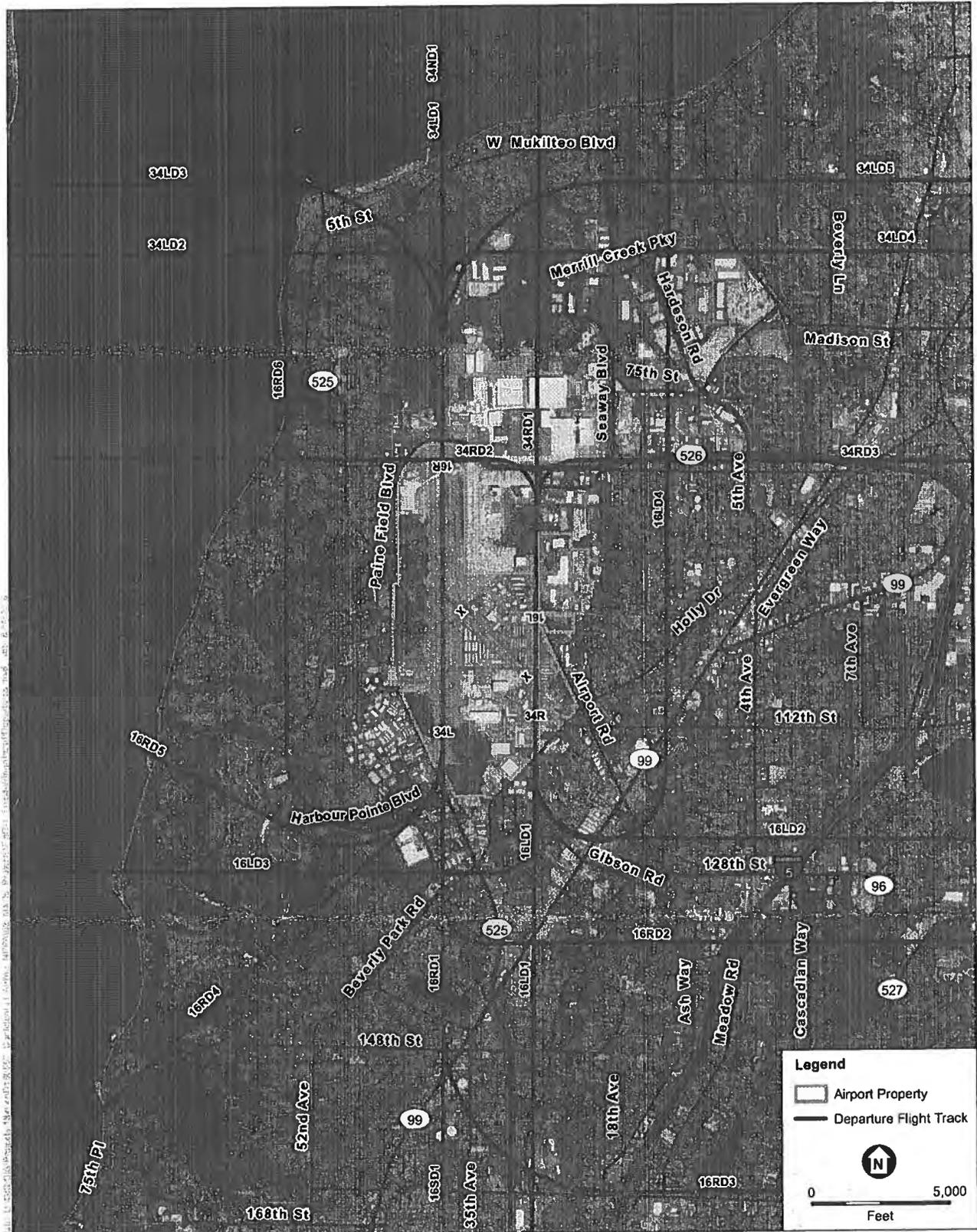
Nick Kosin  
7467 East Polk Street  
Port Orchard, WA 98366



**PROJECTED AIR TRAFFIC  
RADAR VECTOR PATTERNS  
AS PROJECTED BY  
N.A.C. LTD. (206) 854-5347**  
Graphics - Fred Baxter, Architect  
Runway 16 - Southwind  
Arrivals   
Departures   
 School District  
(Number of Schools noted)  
**FOR MORE INFORMATION  
CALL "Save Our Communities"  
7 4 4 - 8 1 3 9**



**NO!**  
**KUSAP COURT**



16LD3  
OUSA /  
WUSAP 0

16RD4  
OUSA /  
WUSAP 0

SOURCE: USDA NAIP (Aerial Imagery); AEDT 2d; ESA, 2018  
NOTE: Runway 11-29 closed indefinitely.

**Figure F-1**  
Fixed-Wing Aircraft Departures  
Snohomish County Airport (Paine Field)



3054



16RA3  
OUSA  
KUSAP!

SOURCE: USDA NAIP (Aerial Imagery); AEDT 2d; ESA, 2018  
NOTE: Runway 11-29 closed indefinitely.



4NA1  
4LA2  
4LA1  
+ LA1

OUSA  
KUSAP ?  
!

Figure F-2

Fixed-Wing Aircraft Arrivals  
Snohomish County Airport (Paine Field)



4 of 4

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## Response to Comment

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Dear Nick Kosin:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### **General Responses**

3-5: Where are Flight Tracks Shown?

3-6: What Are the Existing and Future Noise Impacts?

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October 28, 2018

P175

Environmental Science Associates  
Paine Field Supplemental EA  
5309 Shilshole Ave NW  
Suite 200  
Seattle, WA 98107

Greetings,

I live two miles from  
Paine Field and am  
enthusiastically in  
favor of the proposed  
commercial air service.  
Not having to make the  
long trip to Sea-Tac  
will be wonderful!

I am not at all concerned  
about additional noise  
of the airplanes that fly  
out of Paine Field now,  
the small propeller planes  
make far more noise  
than the commercial  
airliners.

Sincerely,

Ann Schmidt  
921-130th St SW #D201  
Everett, WA 98204  
425-348-5780

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## **Response to Comment**

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Dear Ann Schmidt

Thank you for your comments regarding the Proposed Action at Paine Field.

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**From:** Richard Potter <potterre@frontier.com>  
**Sent:** Friday, November 2, 2018 3:16 PM  
**To:** Paine Field <paine@esassoc.com>  
**Cc:** potterre@frontier.com  
**Subject:** Commercial air service impact comments

Will the law and government agency practice protect us from “death by a thousand cuts”?

In the future when additional flights are proposed, will the “impact” be measured from a starting point of today (2018 – before any commercial flights) or just from the then current level of activity? If the latter, “death by a thousand cuts” . . .

Is there an absolute limit of number of flights, noise levels and number of noise events, traffic, etc. at which the federal government will say “stop; no more”? If not, “death by a thousand cuts” . . .

Richard E. Potter

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## Response to Comment

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Dear Richard Potter:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### **General Responses**

1-1: Adequacy and Use of FAA Guidance

2-1: Why Can't the County Limit or Restrict Operations?

6-8: Cumulative Impacts

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**From:** Jeff Matheson <jeffdmatheson@gmail.com>  
**Sent:** Friday, November 2, 2018 3:16 PM  
**To:** Paine Field <paine@esassoc.com>  
**Subject:** Comments in support of regularly scheduled passenger flights

I support regularly scheduled flights out of Paine Field. Our home is to the south west of the airport and our business near the corner of airport road and Hwy 99 so we would share in the perceived negative aspects of the passenger service but we still support it for the following reasons

1. The proposed passenger jets are smaller and quieter than the larger jets that Boeing currently flies out of Paine for their manufacturing and testing operations.
2. Many of the complaints that I have heard from local residents have been related to Boeing test running engines at night. On average passenger planes will start and proceed as quickly as possible to the runway.
3. Looking at the noise complaints logged by concerned citizens on Paine Fields website won't go away if the passenger service is rejected. The Antonov and dreamlifter freighters are very loud and can take off at odd hours of the night and none of that will change under any of the scenarios under consideration. The passenger planes are smaller and quieter than the freighters. Other noise complaints have even been about small private aircraft that fly lower and slower than larger jets and, again, none of that activity will be affected by approving or rejecting passenger flights.
4. While vehicle traffic may increase around the airport total vehicle miles driven will go down because passengers will only have to drive to Paine field instead of all the way to Seatac to catch a flight.
5. Increased mass transit options in the area including the swift bus starting spring 2019 and the light rail option scheduled for the future will give people a car free trip option decreasing the pressure on local roads.

This increase in service will help passengers, including my family, looking to travel by air and I believe the passenger air service should be approved.

Thank You, Jeff Matheson 6104 Norma Beach Rd, Edmonds, WA 98026 425-422-9130

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## **Response to Comment**

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Dear Jeff Matheson:

Thank you for your comments regarding the Proposed Action at Paine Field.

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Dear Committee Members

I am writing as a concerned Mukilteo resident that the Environmental Review for increasing flights from 12 to 24 per day was not detailed enough or have a large enough scope and should have been an EIS as well as allow for more public comment.

Some of my concerns are:

The possibility of dumping fuel from the planes into the Salish Sea where the threatened ORCAs reside and are on the brink of extinction. One of the factors affecting the Orcas is pollution. Dumping of airplane fuel would definitely be detrimental to them as well as other marine life.

There is no guarantee that the flights will be limited to the 24, and although it may be capacity for the two gates, there could always be another gate built. We already saw it jump from 12 to 24 before it even got started.

The traffic in the Mukilteo area is horrendous in the Mukilteo area now. With the addition of 2,000 more cars a day it will be at a standstill. There will need to be more traffic lights installed and possibly streets widened. The Mukilteo residents, the ones that have been opposed to this runway from the beginning, do not want to be the ones paying for the traffic and noise mitigation. Propeller and the people and businesses in the surrounding areas such as Everett and Lake Stevens that are not impacted by the airport but insist it will be a benefit to all should be the ones paying for any mitigation that is needed.

What about the other “airport type” businesses this may bring to the area that will also bring down our home values. Has this been addressed so it cannot happen.

The night time hours of 9 flights seems excessive, why not zero flights between 10 p.m. and 8 a.m. just like the residents with Homeowners Associations must abide by.

As a 30 year resident of Mukilteo I have been strongly against the addition of commercial service to an airport that had an agreement in place when we bought our homes stating that this would not happen. Now that the interested parties have pushed this through the least they can do is be good to the citizens that live here and pay for any mitigation, limit the flights to no more than 24 (12 would be preferential) , zero at night and have no dumping in our precious resource the Salish Sea.

Respectfully,  
Darci Long

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## Response to Comment

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Dear Darci Long:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### **General Responses**

- 1-1: Adequacy and Use of FAA Guidance
  - 1-2: Scope of the Supplemental EA Analysis for Future Operations and Passengers
  - 1-3: Flawed/Inadequate Supplemental EA
  - 2-1: Why Can't the County Limit or Restrict Operations?
  - 2-5: Would there be an Increase in Fuel Dump/Fuel Smell/Residue?
  - 5-1: Existing and Future Traffic
  - 5-2: Traffic Analysis
  - 6-2: What is the Impact on Property Values?
- 
-

RECEIVED BY

ESA

DATE - 11/2/18

Kevin Dahl  
5619 Sound Ave.  
Everett, WA. 98203  
October 30, 2018

Environmental Science Associates  
Paine Field Supplemental EA  
5309 Shilshole Ave. N.W. suite 200  
Seattle, WA. 98107

Dear Associates:

I would like to comment on the supplemental environmental assessment for Paine Field. As a neighbor to Paine Field, and probably living one of the closest to the flight path, I would like to give my support to the commercial airline service at Paine Field. My wife and I have lived at this location for over 30 years. The noise level has been fine over this period of time, except for the occasional military plane and the dream lifter (especially early in the morning). I feel that the commercial airline service will enhance the lives of the area by providing additional safety, efficiency and convenience to area residents as well as cutting down on car trips on I5 from Everett to Sea Tac and their carbon footprint. I appreciate the consideration that has been given to the area residents for their input. I truly believe the support the airport will give to improve growth and safety for the area going forward is well worth the amount of flights involved.

If you would like to contact me for any further information, I can be reached at 425-347-1524 or at [kevin@3dsalons.com](mailto:kevin@3dsalons.com)

Sincerely,



Kevin Dahl

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## Response to Comment

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Dear Kevin Dahl:

Thank you for your comments regarding the Proposed Action at Paine Field.

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Environmental Science Associates  
Paine Field Supplemental EA  
5309 Shilshole Ave NW, Suite 200  
Seattle, WA 98107

October 30, 2018

RECEIVED BY  
ESA  
DATE - 11-2-18

To the parties at interest:

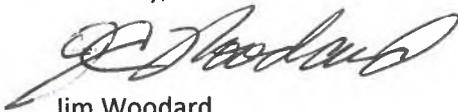
In regards to the proposed commercial passenger services at Paine Field for Alaska, United and Southwest Airlines, I am in complete support of implementing these services. Having lived in Seattle since 1953, worked for the architectural firm (TRA) who designed the late 1960's major expansion, and traveled by air extensively for work as well as leisure, I am well-aware of the challenges of having only one regional airport. Sea-Tac is essentially landlocked and expanded to its maximum footprint. Major cities such as the greater Seattle urban environment, which has limited land and functional space, need more than one airport facility.

Sea-Tac does not have the space for future expansion. Utilizing an existing facility like Paine Field is the most economic and common-sense solution to the continued demand for air transportation. Local residents have a legitimate concern about increased airplane noise, which my family has experienced being directly under the flight paths for both Sea-Tac and Paine Fields. The increased flights, since we moved to our current location in 1993, are noticeable occasionally when outdoors but are not impactful enough to deter normal conversation and not apparent when indoors. Street noise on our neighborhood road from the significant increase in traffic due to rampant development is far more of a factor. Unfortunately, a few of us will need to make some sacrifice for the benefit to all.

The benefits of a north end airport far outweigh the perceived problems. Reductions in traffic to Sea-Tac from the north areas might be minor in the beginning, but beneficial to all in the future. The future development and expansion of Paine Field will clearly be a significant benefit to the entire region in all commercial aspects.

Please contact me with any questions.

Sincerely,



Jim Woodard

24229 23<sup>rd</sup> Ave W

Bothell, WA 98021

206-910-2229

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## **Response to Comment**

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Dear Jim Woodard:

Thank you for your comments regarding the Proposed Action at Paine Field.

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P181

RECEIVED BY  
ESA  
DATE-11-2-18

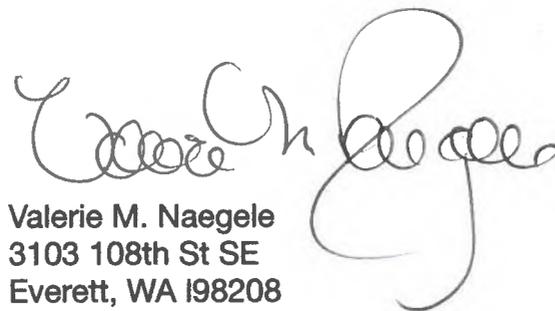
October 28, 2018

FAA  
Environmental Science Associates  
Paine Field Supplemental EA  
5309 Shilshole Ave NW #200  
Seattle WA 982107

To Whom it May Concern:

As a south Everett home owner I do not want to see commercial airport. I would ask that you review the Sunday 10/27 Seattle Times article regarding the addition of extreme amounts of additional flights. The total disregard and unimplemented "Greener Skies Plan".

The Paine Field Airport has not even been completed and the number of flights has been increase from 12 to 24. Who is going to be responsible for the decrease in my health and property values. The FAA or Snohomish County.. or both.



Valerie M. Naegele  
3103 108th St SE  
Everett, WA 98208

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## Response to Comment

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Dear Valerie Naegele:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### **General Responses**

3-8: What are the Health Effects of Noise?

6-1: What are the Quality of Life Impacts?

6-2: What is the Impact on Property Values?

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What about promises to cut noise, jet fuel use and greenhouse gas emissions over neighborhoods to the north?

## Comment Form

Snohomish County Airport/Paine Field  
Draft Supplemental Environmental Assessment

Public Information Workshop

Monday, October 29, 2018

Flying over Vashon Island? Give me a break. Fly over Bainbridge where all the attorneys live and you would be sued immediately

Name:

Kristie Simard

Address:

7307-174th St SW  
Edmonds, WA 98026

Phone or Email:

425 443 2743 KristieSimard1601@gmail.com

RECEIVED BY

ESA

DATE 10/29/18

10/30/18

Please provide comments in the area below. (See back or attach additional sheets if necessary):

Last night's Public Hearing was very obviously a box that had to be checked before the FAA gives final blessing to commercial flights at Paine Field. Old/out of date data was used, no consideration for water/pollution run off. It is not only ridiculous but an outright falsehood to say 24 round trip daily flights will not impact our way of life, our ability to enjoy our homes, our property values. Fortuitous timing was a front page article in the Seattle Times about the disastrous consequences of SeaTac expansion for south end neighborhoods. At least the international airport in their area was there when they bought their properties. Now you want to inflict similar damage to the north end. You will say Paine Field will have only domestic flights: for now. Only 24 round trip flights: for now — already double the original request. By allowing this expansion the floodgates will be opened. I bet none of the FAA and environmental people involved in this decision live in the flight paths proposed.

The comment period ends on November 2, 2018. Comments may be submitted at the Public Information Workshop or to the following addresses:

# TRAFFIC NOISE SOARS

P182

**A-TAC** | As airport booms, distant neighborhoods were promised relief that never arrived.



MIKE SIEGEL / THE SEATTLE TIMES

Ash Airways Boeing 777 approaches for a landing at Sea-Tac Airport as three other planes taking off are seen in the background.

**DOMINIC GATES**  
*Seattle Times aerospace reporter*

After more than two decades living in Shoreline, retired attorney Jean Hilde says plane noise in the past three years has reached disturbing levels. "I am one of those afflicted citizens, despite the fact that I live 25 miles from the airport," she wrote to the Port of Seattle last year.

Hilde and other residents to the north would have been spared this affliction if an innovative air navigation technology had been implemented, as proposed years ago, to guide inbound planes along a satellite-guided shortcut path over downtown Seattle.

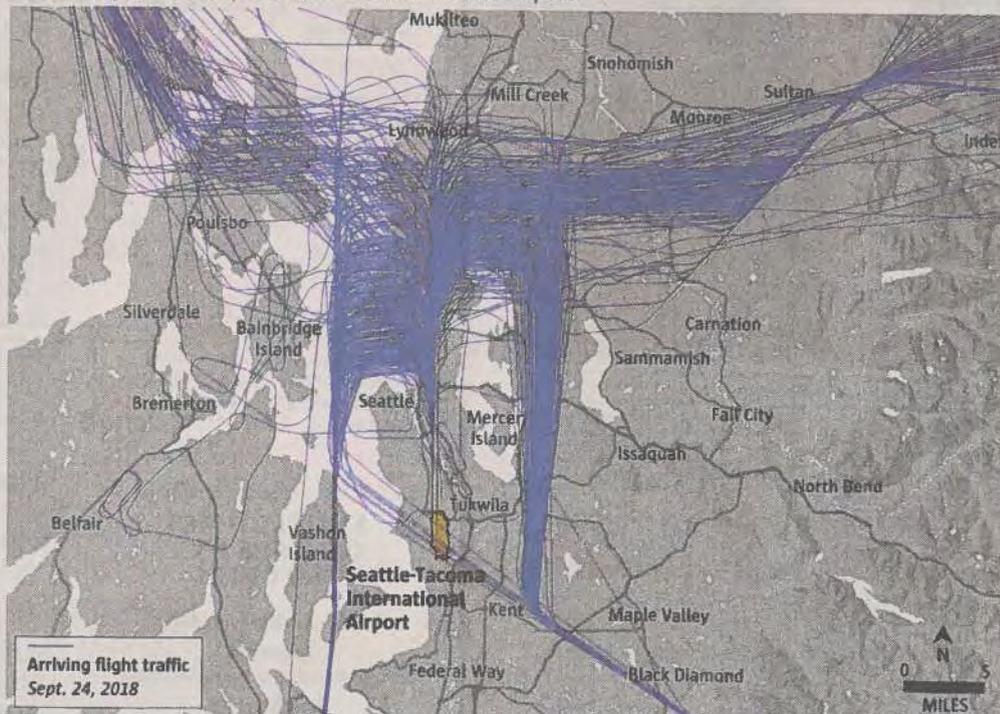
**STRONG**  
**Activists**  
**Protest new**  
**flight path**  
**14**

Meanwhile, the region's air traffic growth has continued unabated.

In the past five years, the number of aircraft flying into Seattle-Tacoma International Airport — one of the fastest growing in the U.S. — increased almost 30 percent and annual passenger traffic jumped from 35 million people to 47 million. Big new airport

## 24 hours of arrivals at Sea-Tac International Airport

The tracks for all flights arriving at Sea-Tac on Sept. 24, 2018, illustrate how the key phase of the Greener Skies plan for west-side arrivals has not been implemented. Most planes are not turning over Elliott Bay and downtown Seattle as touted, which would have reduced overflights north of the city. Instead, west-side planes fly as much as 15 miles farther north, turning at various points to head south to the airport.



SUNDAY, OCTOBER 28, 2018 | **The Seattle Times** | News A15

# Burien stirred up by roar from new Sea-Tac Airport overflights

By DOMINIC GATES  
Seattle Times aerospace reporter

The strongest protests from people affected by airplane overflights come when a sudden increase in noise is imposed apparently by fiat. That's what has happened in Burien.

In July 2016, without any notice to either the Port of Seattle or the city of Burien, the FAA directed all southbound Horizon Air Q400 turboprop planes taking off to the north to make an automated turn almost due west immediately after takeoff.

The intent was to move these planes more quickly out of the way of the faster jets, helping controllers

efficiently clear the airspace and avoid delays.

Instead of waiting for commands from air traffic controllers and then turning west at varying points, suddenly all these planes were flying due west on the same straight shot directly over Burien out to the waters of Puget Sound.

This instruction only applied when the wind was from the north, which is only about 30 percent of the time, mostly in the summer. And it applied only to the Q400s, about 2 percent of Sea-Tac departures.

Still, on those days, that means 35 to 40 of the planes follow a narrow westbound

track, mostly during peak hours, said Terry Plumb, a retired Seattle Department of Transportation project manager who lives in the well-off Seahurst neighborhood of Burien.

"We always had quiet," said Plumb. "That's why people live here." Though he believes the new noise has knocked 20 percent off the value of his home, he says he'll move if nothing changes.

His neighbor, retired Alaska Airlines pilot Larry Cripe, can usually hear the wind whisper in the trees behind his million-dollar house, which sits on a steep bluff overlooking Puget Sound. But not on days when

the planes take off to the north.

"If this airport continues to grow unbridled, we're going to destroy Puget Sound and everything we value here," Cripe said.

Cripe, Plumb and others formed an activist group, the Quiet Skies Coalition. And the city of Burien filed suit last year asking the U.S. Court of Appeals to review the FAA decision. The federal Department of Justice forced a suspension of the new automated turns while the FAA did an environmental-impact assessment.

The victory didn't last.

In April this year, the FAA reinstated the automated

turns, including only nighttime flights, after its analysis concluded that the new flight pattern would produce only "very minor changes in noise exposure levels."

"It seems the FAA is working for the airlines," Cripe said, calling this "an outright abuse of power."

While well-off residents are the most vocal and active in protesting, Burien has many immigrant and lower income residents, some of whom are more fatalistic.

East of Cripe's home overlooking Puget Sound, Burien's streets are flanked by very modest houses.

Sandra Aguila has lived in one of those for two years,

after moving from Des Moines, where she found the noise of airplanes overhead much worse.

In Burien, "This is one of my lesser problems," Aguila said. "I ignore them."

Paul Marquis, an immigrant from the Caribbean who has lived in his home in Burien for more than 40 years, likewise wasn't much concerned.

"What you cannot change, you ignore," Marquis said. "The rain is going to fall. You accept it."

Still, dozens of residents attended a public meeting in Burien in September. Many complained of the FAA's lack of responsiveness. The city's outside lawyer updated the meeting on the lawsuit, which continues.

Asked for comment on the Burien flight-path changes, the FAA declined, citing the pending litigation.

Dominic Gates: 206-464-2963 or [dgates@seattletimes.com](mailto:dgates@seattletimes.com); on Twitter: @dominicgates.

## < Sea-Tac

FROM A1

facilities are under construction, and plans for further expansion, including a second passenger terminal, are taking shape.

Community activists are mobilizing to protest the impact on the ground. The Port of Seattle, the Federal Aviation Administration (FAA), airline representatives and local city officials are exploring some potential noise reduction measures — but none matches the scale of the massive projected jump in air traffic.

### Frenetic growth

Surprisingly, fewer airplanes come in and out of Sea-Tac today than in 2000. The number dropped for some years last decade as airlines switched to bigger planes and packed in more people.

Since 2014, however, Delta has elevated Sea-Tac to a major hub and Alaska Airlines has matched its growth. In the past two years, seven international carriers flying big widebody jets have added service to Seattle, with three more coming in 2019. With that, the number of



MIKE SIEGEL / THE SEATTLE TIMES

A Delta Airlines Boeing 757 flies over South 188th Street on its final approach to Seattle-Tacoma International Airport.

## Passenger traffic at Sea-Tac swelled 65 percent between 2000 and 2017

With larger planes carrying more people, passenger volume has boomed. The number of aircraft is also on the rise in the past few years.

PASSENGERS	DOMESTIC	INTERNATIONAL	TOTAL	Landings and takeoffs	TOTAL

Vashon, using less fuel and producing correspondingly lower carbon emissions.

Yet even this successful part of Greener Skies has a downside.

paths, not the Port.

“I don’t get to set the policy,” she said.

The FAA responded to questions about noise impacts and Greener Skies only

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## Response to Comment

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Dear Kristie Simard:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### **General Responses**

- 1-3: Flawed/Inadequate Supplemental EA
  - 3-5: Where are Flight Tracks Shown?
  - 3-6: What Are the Existing and Future Noise Impacts?
  - 4-1: Sources of Existing Air Pollution
  - 4-2: Air Quality
  - 6-1: What are the Quality of Life Impacts?
  - 6-2: What is the Impact on Property Values?
  - 6-9: Water Quality Impacts
- 
-

**From:** jacollet <jacollet@ymail.com>  
**Sent:** Friday, November 2, 2018 4:01 PM  
**To:** Paine Field <paine@esassoc.com>  
**Subject:** EIS

Hello,

I am a homeowner on Debreton Lane/ Lamar Dr in Mukilteo. Our neighborhood was not included in the area of study, but we are definitely impacted. We are located in the flight path of runway 16 R.

We would like to ask for a fully scoped environmental impact study to be conducted in our neighborhood. There are at least 80 plus single family homes in the area that will be impacted by these flights.

We are concerned about the night and early morning flights. For instance, a noise abatement /curfews like SNA or SAN have in place, would be something to consider.

We love our neighborhood, with all of the wildlife, the great neighbors/ young families and the quality of life that all of which could very well be affected and disrupted.

Thank you for your consideration,  
J Collet

Sent from my Galaxy Tab® A

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## Response to Comment

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Dear J. Collet:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### **General Responses**

1-1: Adequacy and Use of FAA Guidance

1-2: Scope of the Supplemental EA Analysis for Future Operations and Passengers

1-5: Additional Study Should be Conducted

1-7: Study Areas

3-9: Request for Noise Curfew/Activity Restrictions

6-5: What is the Impact on Wildlife?

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**From:** Cheryl K. Lee <cheryl.k.lee.ckl@gmail.com>  
**Sent:** Friday, November 2, 2018 4:03 PM  
**To:** Paine Field <paine@esassoc.com>  
**Subject:** Paine Field Environmental Assessment

Please respond to the following:

1. Why was no Washington State environmental impact study performed?
2. Why was only the impact to Paine Field included in the Environmental Assessment rather than appropriately including impact to surrounding communities who will obviously be highly impacted by noise and increased air pollution?
3. How can commercial flights depart or land at night without an operating control tower? What is the increased risk to passengers, who have a reasonable right to expect optimum safety practices to be employed?
4. What is the plan for emergency response in a timely manner should an accident occur night, and it will, without a manned control tower?
5. How can a statement by the interested parties conclude that the safety of children is important when departing south bound flight patterns will take aircraft over at least 3 grade schools, 1 junior high school and 1 high school? And what about the rest of us? Do we not matter?
6. Why was a 50 year old, highly controversial model for noise used rather than doing the real work of studying current noise levels and assessing the real impact of increased air traffic, especially at night?

Current noise - and pollution - impact to surrounding communities including Whidbey Island, Mukilteo, Lynnwood, Mountlake Terrace, Brier and, to a somewhat lesser degree, Edmonds and Mill Creek will be highly significant.

7. How do Propeller/Snohomish County/United Airlines/Alaska/Allegiant/the FAA proposed to financially compensate homeowners for the loss of quiet, increase in pollution from uncombusted aircraft fuel and loss of home values?
8. How do the parties named in point #7 plan to pay for traffic flow studies and road improvements necessitated by traffic increases generated by increased operations at Paine Field?
9. The FAA can assign to itself the responsibility to write an operating rule that curtails night flights in urban/suburban areas; after all they've delegated themselves the power to impact all of airplane build processes, maintenance and operating. Why was the cavalier statement made that

the FAA does not interfere in airline revenue streams?

It is disingenuous of the FAA and Environmental Associates to presume and attempt to demonstrate no impact to the communities surrounding Paine Field. What a shame there is such a lack of respect for residents of these communities.

Respectfully submitted,

Ms Cheryl Lee  
4211 216th St.SW  
Mountlake Terrace  
WA 98043

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## Response to Comment

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Dear Cheryl Lee:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### General Responses

- 1-1: Adequacy and Use of FAA Guidance
- 1-3: Flawed/Inadequate Supplemental EA
- 1-7: Study Areas
- 2-1: Why Can't the County Limit or Restrict Operations?
- 3-4: Noise Analysis Methodology
- 3-6: What Are the Existing and Future Noise Impacts?
- 3-7: Noise Impacts on Schools
- 4-1: Sources of Existing Air Pollution
- 4-2: Air Quality
- 5-2: Traffic Analysis
- 6-6: What are the Safety Impacts due to the Air Traffic Control Tower Hours?
- 6-11: Mitigation

Please also see the following individual response.

### SEPA Analysis

The Supplemental EA was prepared in compliance with the National Environmental Policy Act. Snohomish County conducted SEPA compliance separately and issued a Mitigated Determination of Non Significance on 2/13/17. The link to the SEPA document is found at <https://fortress.wa.gov/ecy/separ/Main/SEPA/Record.aspx?SEPANumber=201700905>.

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**From:** Joel Hudson <jthudson@iu.edu>  
**Sent:** Friday, November 2, 2018 4:08 PM  
**To:** Paine Field <paine@esassoc.com>  
**Subject:** Commercial flights @ PAE

Good afternoon,

My name is Joel Hudson, a homeowner and commercial pilot who lives under the flight path of runway 16R. I was going through documents that my neighbors have been sharing regarding the environmental impact study that has been completed. One of the documents shows a purple square showing the area that encompassed the environmental impact study. My street which is very close the centerline of runway 16R was omitted. My neighborhood is full of single family homes with many young families. We have Bald Eagles, deer and several different species of birds and mammals that frequent the neighborhood. I believe that it would be in the best interest of all involved, would be to include all of the neighborhoods north of the previous study limit. There are at least eighty single households that have been omitted from the previous study, these areas should be included in a "fully scoped environmental study".

My main concern is the noise during late night and early mornings. John Wayne (SNA) and Lindberg (SAN) are two airports that have residential homes surrounding the airports. Strict curfews and noise abatements have helped both airport and communities. I believe that careful planning with a proper impact study to include everyone, would be the best outcome for everybody. I do not want to be waken late at night and have the value of my home decrease. Please consider curfews and noise abatement requirements so our quiet neighborhood remains so when we sleep.

Thank you for your time. regards, Joel

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## Response to Comment

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Dear Joel Hudson:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### **General Responses**

- 1-3: Flawed/Inadequate Supplemental EA
  - 1-7: Study Areas
  - 3-6: What Are the Existing and Future Noise Impacts?
  - 3-9: Request for Noise Curfew/Activity Restrictions
  - 6-2: What is the Impact on Property Values?
  - 6-5: What is the Impact on Wildlife?
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PO Box 326  
Mukilteo, WA 98275  
November 2, 2018

To Whom It May Concern:

My comments regarding the draft 2018 Draft Supplemental Environmental Assessment for Proposed Commercial Air Service at Paine Field are as follows:

Overall concerns:

-Scope is excessively narrow

-Seems as though study is in denial of prospect of potential growth.

-Propeller is a for-profit entity; Airlines are for-profit entities; The nature of business is to seek growth. Extremely unrealistic and/or naive to assume that expansion of airline service and terminal growth will not be sought

-If future growth is not planned, why was a modular terminal design chosen?

-Seems as though EA is crafted to support a predetermined outcome to initiate scheduled airline service at PAE.

-Good judgment and integrity dictate that a more thorough EIS needs to be completed rather than the "short form" EA.

-Cumulative analysis vs. incremental approach

-I find it difficult to believe that you can double the number of flights (and the consequential volume of activity, e.g. surface transportation and construction) and conclude that there is "no significant impact." What would be your thresholds for "significant impact" in the following areas?

-Aircraft noise

-Surface transportation

-New construction

-General aviation flight traffic; How much will increased airline traffic for RWY 34L/16R displace GA traffic to RWY 34R/16L? What will be the noise impact of increased GA traffic be to residents underlying the east traffic pattern?

-Need a better "process map"

-What are the "gates" of activity that define when a reassessment is required?

-Understood reassessment is triggered if the airlines seek to change the equipment they operate, e.g. upgrade from E175 to B737.

-How about for flight schedule changes? How many additional flights would trigger a reassessment?

-How about for surface transportation volume?

-Again, what are the criteria thresholds for “significant impact?” (Flights per day, traffic volume per hour, etc.?) Triple the number of flights? Quadruple the number of flights? Etc....?

Specific concerns:

- Terminal expansion and general aviation encroachment
  - Near certainty that airlines and Propeller will seek to expand operations, or they would not have wanted to operate here.
  - PAE already needs more GA hangar capacity
    - Median 2-2.5 year wait for GA hangar space
  - EA 1.2.2- “...On January 31, 2013, a petition was filed in the United States Court of Appeals for the Ninth Circuit challenging the FONSI/ROD.6...The FAA argued that it did not view the possibility of unlimited commercial service at Paine Field as reasonably foreseeable. The FAA pointed to a number of constraints and physical limits at Paine Field that limit the number of commercial air service operations that can be accommodated at the airport including the size and capacity of the proposed modular passenger terminal...”
    - Unrealistic assumption. Where there’s a will for expansion, there’s a way.
    - Please specify the “constraints” and “physical limits” that are referenced here. Such as...?
    - If it is to be assumed that there is no intent to pursue growth of airline operations and the terminal, then we need a legally binding document to say so. Not verbal assurances which are unenforceable.
      - If such a written document imposing such a constraint is not feasible, then
- MOTION NO. 18-313; AUTHORIZING THE EXECUTIVE TO EXECUTE AN AMENDMENT TO LEASE WITH PROPELLER AIRPORTS PAINE FIELD, LLC AT THE SNOHOMISH COUNTY AIRPORT
  - Passed by County Council on 09/12/2018 (slipped in under “New Business”)
  - Not factored into EA update according to ESA staff
  - Expansion of P4 parking lot appears to encroach on GA parking in central ramp
    - How many GA tie downs are impacted?
    - How will parking and ease of access for existing GA tenants and customers be assured?
    - Reports that existing GA tenants will now have to pay for background checks and/or annual fees for gate access? They did not incur this cost; it’s not their responsibility.
- Need a comprehensive GA encroachment mitigation plan which studies multiple projected terminal growth scenarios. We are told that the County cannot discriminate against airline operations. Neither can the County discriminate against GA operations which have been conducted here for decades if terminal and airline operations expansion is sought.
- Surface transportation

**-Where is Appendix E? (No link)**

-Discussion with ESA staff indicated a selection of arterial roads and select intersections were studied

-What about Mukilteo side streets (e.g. 80<sup>th</sup> & 76<sup>th</sup> SW) not addressed (spoke with ESA)?

- "Shortcut" traffic volume and content (including semis and tandem dump trucks) already encroaching on local neighborhoods and side streets surrounding PAE during peak traffic hours as they attempt to bypass nearby arterial intersections.

-What is impact of additional surface traffic to these side streets proximal to airline arrival and departure times?

-EA 6.13.1 "...The Proposed Action would add trips to four intersections that are anticipated to operate at deficient levels of service in the future even if the Proposed Action is not implemented – State Route (SR) 525 at Beverly Park Road, SR 99 at Airport Road, the I-5 northbound ramps at 128th Street SW/SR 96, and SR 525 at 84th Street SW."

-Maybe this rationale works from some kind of philosophical perspective. But not from the perspective of corporeal reality. Is this supposed to mean it's OK to dump more traffic into intersections that are already performing at a deficient level of service? (I laughed out loud when I first read this statement.)

-In the absence of a link to Appendix E, what is the plan to address the intersections which are already performing at a deficient level of service, which will logically become even more deficient once more airline passenger traffic starts dumping into them?

In conclusion:

-Many questions still in need of many answers.

-My professional experience includes over 20 years as an engineer, 8 years as a military officer, and 2 years on my union's executive board. Over the years my expectations for studies have evolved such that I perceive an abundance of excessively optimistic assumptions which rarely are a good match for what actually happens in practice and reality. In addition, like so many other studies this one appears to be drafted to support a predetermined conclusion.

-I agree fully with Save Our Communities (Mike Moore) and Mr. Fleischer. This is "déjà vu all over again." Or Einstein's definition of insanity, take your pick. Could we PLEASE do this properly and perform a full EIS? Or at least make the attempt?

Skeptically Yours,

Mike Shea

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## Response to Comment

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Dear Mike Shea:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### General Responses

- 1-1: Adequacy and Use of FAA Guidance
- 1-2: Scope of the Supplemental EA Analysis for Future Operations and Passengers
- 1-3: Flawed/Inadequate Supplemental EA
- 1-5: Additional Study Should Be Conducted
- 1-8: Significance of Project Impacts
- 1-9: How Is Significance Defined?
- 2-1: Why Can't the County Limit or Restrict Operations?
- 2-3: What are the Effects of the Proposed Project on General Aviation?
- 5-1: Existing and Future Traffic
- 5-2: Traffic Analysis
- 6-8: Cumulative Impacts

Regarding the availability of Appendix E, the Notice of Availability, locations of the EA document for review, and links to a digital copy of the entire document can be found at the following link:

<https://wa-snohomishcountyairport2.civicplus.com/220/2018-Air-Service-Environmental-Assessmen>

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**From:** Amy Gulick <amyg@nwlink.com>  
**Sent:** Friday, November 2, 2018 5:28 PM  
**To:** Paine Field <paine@esassoc.com>  
**Subject:** EA Comments: Increased Commercial Traffic at Paine Field

Hello:

Below are my written comments regarding the Environmental Assessment and Supplemental for the proposed increased commercial air traffic at Paine Field.

- 1) Given the magnitude of the proposed increase in commercial air traffic at Paine Field, why wasn't a more comprehensive Environmental Impact Statement conducted? The streamlined Environmental Assessment and Supplemental is not sufficient and was conducted **without** any public input on the scope of the study.
- 2) Why was only one public hearing held? Projects with less significant impacts than this conduct multiple public hearings so that public input is gathered and considered in the final study.
- 3) What criteria is used to define a "significant impact?" The project's proposed scope of increasing commercial air traffic at Paine Field will have multiple impacts that will compound as the air traffic increases over time.
- 4) How will the cumulative impacts of the increase in commercial air traffic be assessed? What assurances exist that these cumulative impacts **will** be assessed?
- 5) Why wasn't a study evaluating the impacts on the value of affected homes conducted?
- 6) What are the mitigation measures to address noise, air, and light pollution to affected communities?
- 7) If the project is approved, what is the mechanism for deciding how and when mitigation funds will be distributed to affected communities?

The Constitution of the United States ensures that all citizens have the right to pursue life, liberty, and happiness. Living in an area affected by severe noise pollution due to frequent and regular airline traffic has multiple impacts on the health and well-being of those affected, and severely diminishes the ability to pursue happiness. Projects like the one proposed at Paine Field do not benefit the surrounding communities; instead, communities suffer and pay the costs so that for-profit corporations can increase their bottom lines.

Growth for growth's sake is the definition of cancer.

I would appreciate a response to my comments.

Thank you,

Amy Gulick  
P.O. Box 1009  
Clinton, WA 98236

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## Response to Comment

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Dear Amy Gulick:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### **General Responses**

- 1-1: Adequacy and Use of FAA Guidance
  - 1-2: Scope of the Supplemental EA Analysis for Future Operations and Passengers
  - 1-3: Flawed/Inadequate Supplemental EA
  - 1-4: Adequacy of Public Involvement and Public Hearing
  - 1-5: Additional Study Should be Conducted
  - 1-8: Significance of Project Impacts
  - 1-9: How Is Significance Defined?
  - 6-2: What is the Impact on Property Values?
  - 6-7: Effect on Culture of Local Community
  - 6-8: Cumulative Impacts
  - 6-11: Mitigation
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**From:** GREY CHAPMAN <greyconn@comcast.net>

**Sent:** Friday, November 2, 2018 5:44 PM

**To:** Paine Field <paine@esassoc.com>; Grey and Connie Chapman <greyconn@comcast.net>

**Subject:** Flawed EA - Traffic Issues

If you did your homework regarding the Paine Field area (airport expansion) you would be aware how terrible the traffic is around there. One example,.. 5th avenue that runs between Old town Mukilteo, and I-5 (along the boulevard through forest park, to 41st and on) becomes an enormous choke point every afternoon when Boeing starts letting out. Just yesterday, I had to make a 180 turn (the neighbors love that!) to get out of that stop-an-go traffic...several others doing the same.

Your diagram at the Lynnwood workshop did not include the Mukilteo Boulevard, referenced above.? How can that be?

All of the roads in this area are struggling! ... and this is before the airport expansion.

Now throw some ferry traffic in here.. What a mess!

This area is so beyond capacity right now... and thousands more to come!

The area can not tolerate thousands more.

This is one of the most beautiful places on earth. I've been up and down I-5 a few times and seen what changes growth has brought..good and bad. This area has already seen its share. This is obvious.

Lets figure something out here, starting with a fair EA of the areas traffic.

Regarding compensation for the home owners in the impacted area. This needs to happen.

Homes surrounding the airport were bought in good faith based on the existing policy that included airport expansion at the time of purchase.

The residences of Mukilteo and the outlining areas have fought to prevent this expansion for good reason. It is irresponsible to allow further growth in an area that can barely support its existing traffic demands.

Sincerely,

Hank Chapman

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## Response to Comment

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Dear Hank Chapman:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### **General Responses**

2-2: Mediated Role Determination (MRD) Document

5-1: Existing and Future Traffic

5-2: Traffic Analysis

5-3: Ferry Operations

6-11: Mitigation

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**From:** P TS <pts88@msn.com>  
**Sent:** Friday, November 2, 2018 6:15 PM  
**To:** Paine Field <paine@esassoc.com>  
**Subject:** Additional Flights to Paine Field Comments  
**Importance:** High

Hi there,

I am currently living in Picnic Point areas. I am experiencing the air traffic that flown over our head with noise and disturbance. These included several test and delivery flights from Boeing and private small planes that were observed during the last 20 years. Due to these are not a frequent flight schedule, it can be tolerated. However, a new airport with 48 daily schedules that fly through our roof in future and it will be extremely disturbed our daily environment and this would give me a headache.

The comments on additional flights that fly through Paine Field and its neighborhood. This will jeopardize the neighborhood's living environment such as:

- increase of traffic congestion on Mukilteo Speedway, Beverly Parkway, Airport Road or neighboring areas; this create chaos and accidents that impact Boeing employees working schedules as well as other aerospace companies.
- disturbed the neighborhood environment by increasing the noise of 48 daily flights that fly over the neighborhood,
- decrease wildlife and habitat,
- increase crime rate and safety if there has any plane crash.

Do you have any arrangement for any road expansions to accommodate the future vehicles loads on these roads to release traffic congestion?? Any safety precaution about the planes that fly through our neighborhood in case of disasters??

Please reconsider and give us a response prior to the flights start in January 2019.

Thank you.

Pansie Schioler  
14714 53rd Ave W, Unit 111  
Edmonds, WA 98026

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## Response to Comment

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Dear Pansie Schioler:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### **General Responses**

3-5: Where are Flight Tracks Shown?

5-1: Existing and Future Traffic

5-2: Traffic Analysis

3-6: What Are the Existing and Future Noise Impacts?

6-3: What is the Impact of the Proposed Action On Crime?

6-4: What are the Health Effects Associated with the Proposed Action?

6-5: What is the Impact on Wildlife?

6-6: What are the Safety Impacts due to the Air Traffic Control Tower Hours?

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**From:** WENDY WERTTEMBERGER <mukilteowerts@comcast.net>  
**Sent:** Friday, November 2, 2018 6:47 PM  
**To:** Paine Field <paine@esassoc.com>  
**Subject:** Paine Field Supplemental EA

I have some questions and comments to submit regarding the Paine Field Supplemental EA.

How did the FAA determine that there would be no “significant” noise impacts from 24 additional daily round trip flights from Paine Field? How was “significant” determined? How can it be determined without a comprehensive review including observance of these flights above homes located directly under the flight path? These homes were purchased with the assurance of the “Mediated Role Determination” from Snohomish County that the airport would remain primarily used for light aircraft. Please describe the method used to make this determination.

How did the FAA determine that roads will not become more congested? Were you aware that traffic thru Highway 526 & I-5 North comes to a standstill every afternoon corresponding to Boeing scheduled shift changes? In addition, Hwy 525 thru Mukilteo is a thoroughfare for the Mukilteo/Clinton ferry, with boats running approximately every ½ hour. How will the roads NOT become more congested with an estimated 656,000 annual enplanements? That could mean approximately 1800 additional cars on the surrounding roadways DAILY, with no plan in place to alleviate the increase in traffic.

Noise and traffic will be adversely affected. Correspondingly, why weren't the impacts to home values studied?

How will mitigation be determined and applied? Who oversees that all adverse impacts are mitigated?

Thank-you,

Wendy Werttemberger

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## Response to Comment

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Dear Wendy Werttemberger:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### **General Responses**

- 1-8: Significance of Project Impacts
  - 1-9: How Is Significance Defined?
  - 2-2: Mediated Role Determination (MRD) Document
  - 3-6: What Are the Existing and Future Noise Impacts?
  - 5-1: Existing and Future Traffic
  - 5-2: Traffic Analysis
  - 6-2: What is the Impact on Property Values?
  - 6-11: Mitigation
- 
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**From:** Tom Bean <beantc@gmail.com>  
**Sent:** Friday, November 2, 2018 7:49 PM  
**To:** Paine Field <paine@esassoc.com>  
**Subject:** Comments on Paine Field draft Supplemental EA

I am writing to comment on the draft supplemental EA for proposed expansion of Paine Field operations to include 24 round trip passenger airline flights each day.

My comments are informed by having lived more than 30 years within the flight paths of this airport. I've been only one year at my current address within the general study area (GSA), but my prior home of 30 years was definitely impacted by Paine Field traffic. Depending upon the aircraft and on weather conditions, our home's windows sometimes shook as planes flew overhead. That home was far beyond the GSA boundary.

My first comment is that the GSA boundary is far too small. Its north and south boundaries are too close to the airfield. Impacts continue far beyond these arbitrary limits.

Second, the 65 dBA contour is instructive but insufficient. Prior noise mapping efforts have included 60 dBA and 55 dBA contours, which were much more reasonable in describing the extent of noise impacts. Even these contours do not reach the prior home I mentioned where our windows were sometimes rattled by Paine Field traffic. Showing only 65 dBA contours severely understates the extent of impact.

Third, this EA should include appropriate mitigations for impacts of the cumulative impacts of airport operations in total, not just the "new" flights. The addition of new passenger service should be mitigated by reduction of loud flights at night. Other mitigation opportunities should also be identified and applied.

Please revise to provide a more complete assessment of impact and to mitigate that impact with real improvements.

Sincerely,

Tom Bean  
13518 48th Place W, Edmonds WA 98026

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## Response to Comment

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Dear Tom Bean:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### **General Responses**

1-7: Study Areas

3-2: Use of the DNL Metric

3-3: Noise Measurements and Supplemental Metrics Requested

6-8: Cumulative Impacts

6-11: Mitigation

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# SAVE OUR COMMUNITIES

P.O. Box 482 Mukilteo, WA 98275

[www.socnw.org](http://www.socnw.org)

November 2, 2018

Environmental Science Associates  
Paine Field Supplemental EA  
5309 Shilshole Avenue NW, Suite 200  
Seattle, WA 98107

In response to the comment period for the Draft Supplemental Environmental Assessment for Snohomish County Airport/Paine Field, please find our comments and requests enclosed. We ask for a detailed response to our comments and questions and to our requests for additional action. Additionally, we request you extend the comment period at least 30 days.

Save Our Communities (SOC) is a non-profit organization of concerned citizens from communities throughout Snohomish, Island, and northern King Counties dedicated to preserving the quality of life in this primarily residential area of Puget Sound. We fully support the aerospace manufacturing and general aviation role of the airport which led to the rezoning and development of thousands of acres worth billions of dollars now.

## **Executive Summary**

This Draft Supplemental EA refers to the EA conducted in 2009 and finalized by the FAA on December 4, 2012 with Record of Decision (ROD) finalizing a Finding of No Significant Impacts (FONSI). Given the numerous references to that 2012 EA, it is appropriate and relevant to resubmit our comments on that EA. Our submission included other documents that were referenced and the entire package is attached (Attachment Two).

Part of concern then was the inappropriately limited scope of study that only considered 6.3 flights per day in year one and up to 11.5 flights per day in year 5. We argued that approach only counted on the airlines announced “planned” activity levels and did not consider past, present, and reasonably foreseeable future actions. We argued that activity levels would potentially be increased to much greater levels. It is clear that the same flawed approach is being repeated.

The 9<sup>th</sup> Circuit Court of Appeals in its decision admitted that under the National Environmental Policy Act and its implementing regulation, the FAA was required to analyze all “reasonably foreseeable” environmental impacts of its decision to open

Paine Field to commercial passenger traffic. The decision equated “impact” with “effect” and defined indirect effects as those that are “reasonably foreseeable”. The decision went on to cite a definition of “cumulative impacts” as those which result from the addition of impacts from current and past actions to those of “reasonably foreseeable” future actions.

It is therefore clear that reasonably foreseeable future actions must be considered. Yet, once again, this Supplemental EA repeats the fundamental flaw of the original EA by limiting the scope to the amount of flight activity announced by interested airlines. That is exactly the same flawed approach taken in the original EA. It is ironic that the FAA decision to conduct this expanded scope Supplemental EA actually validates our argument that the original EA was too limited in scope – an argument the FAA rejected. Exacerbating this flaw is the fact that this Supplement EA assumes that a full 5 years after startup there will be absolutely no increase in flight activity whatsoever through increased use of the two gate terminal or expansion of the terminal.

These decisions collectively provide prima facie evidence that “reasonably foreseeable” activity levels were excluded from this assessment. The FAA’s own policy (Order 1050.1F) states past, present, and reasonably foreseeable future actions must be considered in determining whether there are potential cumulative impacts. This was not done in the EA and it was not done in this Draft Supplemental EA. This FAA pattern leads to a conclusion that the FAA does not want to open the cumulative impact door as it would require additional impact and mitigation identification; this needs to change.

Primary Request: We therefore request this Draft Supplemental EA be modified to fully consider past, present, and reasonably foreseeable future actions in order to address potential cumulative impacts. If completed objectively, then we are confident that significant impacts will be identified as noise, emissions, traffic and other impacts will only be greater than what is depicted in the EA or this Draft Supplemental. Identification of significant impacts would lead to a Supplemental EA conclusion that a full EIS should be conducted. That is the part of the purpose of conducting an EA – to either determine a FONSI or recommend an EIS.

Social and Economic Impacts: We fully realize the EIS is more comprehensive and requires a more in depth assessment of potential impacts which not only includes the factors in the Draft Supplemental EA (noise, emissions, traffic, etc.) but also often include the social and economic impacts to local communities, such as impacts to available housing stock, economic impacts to businesses and property values. This would also include costs and timelines involved in mitigating expected impacts.

Impacts and Mitigation Costs: We strongly recommend that these economic impacts and all impacts be identified along with mitigation options and costs. At the public hearings for the EA and the one public hearing for this Draft Supplemental EA, you

heard this concern brought up several times and echoed through the showing of support for such statements (hands raised per the instructions of the moderator).

In order to minimize repeat comments, please read our submission in 2010 and respond to the requests articulated there as they apply to this Draft Supplemental EA – see Attachment 2.

In addition, we make comments and ask a number of questions of this Draft Supplemental EA (Attachment 1). We would expect that an EIS would address these substantial concerns by identifying all impacts, mitigation options and costs. A failure to do this represents an unacceptable social, economic, and environmental liability to the taxpayers and municipalities of Snohomish County.

Sincerely,

Save Our Communities (SOC)  
President, Officers, Board  
On behalf of SOC members

Attachment 1: Comments and Questions on Draft Supplemental EA  
Attachment 2: SOC Submission to the EA that was finalized in December 2012

Cc:	Mayor (Mukilteo)
FAA	Mayor (Edmonds)
Snohomish County Council	Mayor (Lynnwood)
Snohomish County Executive	Mayor (Woodway)
Senator Marko Liias	Mayor (Mountlake Terrace)
Representative	Mayor (Brier)
Representative	Secretary (WSDOT)

**Attachment 1: SOC Additional Comments and Questions to the Draft Supplemental EA**

*Please Respond to all Questions*

**Comment 1: the FAA could have chosen an EIS instead of an EA.****Questions:**

1. Does the FAA find that starting up scheduled commercial service is a significant role change for an airport? If not, then why are so many federal actions required?
2. Why did the FAA choose an EA instead of an EIS?
3. How often does the FAA choose an EA and then proceed with an EIS?

**Comment 2: The FAA approach is required to “facilitate and encourage public involvement”.****Questions:**

1. Was the public invited to provide comment on the scope of study? If not, why not?
2. If not, then how does this approach “facilitate and encourage public involvement”?
3. Was the public input solicited at all other than providing a 30 day comment period and one 2-hour public hearing in one location with a one hour workshop beforehand? If not, why not?

**Comment 3: In addition to NEPA and the Council for Environmental Quality and Code of Federal Regulations, the FAA’s own policy (Order 1050.1F and Handbook) states past, present, and reasonably foreseeable future actions must be considered in determining whether there are potential cumulative impacts.****Questions:**

1. How does limiting evaluation to just the announced intended numbers of flights by the airlines comply with this requirement?
2. Why was there no consideration for expanding the number of flights either through multiple planes handled simultaneously at a gate and/or the expansion of the terminal?
3. Is there an absolute requirement for more NEPA analysis if there is ANY expansion of flight operations and/or passenger throughput?
4. Does the FAA have full discretion to avoid expansion of these proposed operations or to set their own threshold on how much expansion is required to initiate another environmental review?
5. How can incremental increases in activity avoid creating cumulative impacts?

**Comment 4: The Council on Environmental Quality (CEQ) Regulations define a cumulative impact as “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” (see 40 CFR § 1508.7). Cumulative impacts can be viewed as the total combined impacts on the environment of the proposed action or alternative(s) and other known or reasonably foreseeable actions. Cumulative impacts should be considered as early as possible in the project development process, as early identification of potential cumulative impacts may help in the design of alternatives or mitigation measures that minimize a project’s impacts on the environment. If it is determined that there would be no cumulative impacts, clearly document the basis for that conclusion.**

**Questions:**

1. How does the EA or this Draft Supplemental EA address cumulative impacts?
2. Will incremental increases in activities be evaluated in combination with impacts being created with this proposed action?
3. If this leads to a FONSI, then how can incremental activity less than this proposed activity lead to a significant impact determination?

**Comment 5: Social and Economic Impacts are often included in Environmental Impact Statements and one purpose of the EA is determine if there are significant impacts and thus the need for an EIS or not. EA’s are by definition shorter and more streamlined.**

**Questions:**

1. Why weren’t the social and economic impacts to local communities, such as impacts to available housing stock, economic impacts to businesses and property values considered?
2. Why weren’t mitigation options, costs and timelines included?
3. Under what conditions would mitigation options, costs and timelines be included?

**Comment 6: The approach to assess noise impacts is based on averaging noise over a 24 hour period. There are efforts to save the Southern Resident Killer Whales and one of the mitigating actions is to reduce vessel noise so they can communicate better when foraging. The mitigation actions are when vessel noise is being produced close to the whales when they are foraging and not averaging that noise over 24 hours.**

**Questions:**

1. Why is aircraft noise averaged over 24 hours instead of assessing impacts of repeated singular events?
2. What is the scientific basis for this and how old is the research on this approach?

3. Aren't humans impacted by repeated singular noise events more than averaging noise over a day, a week or a year?
4. Do humans have different sensitivities to noise at different ages? How is this accounted for in this assessment?
5. Why aren't humans treated in similar fashion to the Orca's?

**Comment 6:** The Draft Supplemental EA anticipates the addition of 12 million plus more local miles traveled with over 2,100 more car trips per day.

Questions:

1. How can this additional traffic avoid causing measurable and significant impacts particularly during peak roadway use times?
2. Queuing theory shows that adding vehicles to a congested and building lineup at an intersection taking more than one light sequence to move cars through will increase delays very rapidly – in a significant fashion. Why doesn't queuing theory apply here?
3. How does claiming an intersection will get worse in the "do nothing alternative" alleviate the impacts and mitigation associated with the proposed activity?
4. Is the \$676,465.08 traffic mitigation fee a one-time payment? Is that supposed to be the entire mitigation action for transportation for this entire proposed action (and growth potential)? In fact, is that the only mitigation fee in this entire EA?

**Comment 7:** FAA 1050.1F states that while significant impacts of FAA actions tend to be primarily in the airport vicinity, the consideration of cumulative impacts is not limited to the airport or near the airport.

Questions:

1. Why was the study area so limited?
2. Several outside the study area commented at the public hearing. Did the study area exclude impacted areas? If so, why?
3. How does excluding impacted or potentially impacted areas comply with FAA policy stating that cumulative impacts are not limited to the airport or near the airport?

**Comment 8:** The Draft Supplemental EA claims that flight activity in Year 5 will be the same as Year 1 although passenger throughput will be greater. This forecast makes it appear that the airside of the terminal is physically limited to a certain level of operations. Plenty of ramp space is available for accommodating additional ground-level access flights. Using buses to move passengers to/from remote aircraft has been utilized for years at many airports (Dulles, et al).

Questions:

1. What is the basis for ignoring potential increases in flight activity over 5 years?

2. Why is the study timeline only 5 years?
3. Why does passenger throughput grow over 5 years? Will the mix of planes be getting bigger?
4. This draft states that 3 airplanes can be handled simultaneously so why doesn't that lead to more potential flight activity?
5. Historically, the FAA has used "straight line" projections in TAF forecasting for PAE showing a steady increase in operations based on overall macroeconomic factors. The macroeconomics of the PAE market are extremely favorable now (see proponent's arguments!), and Propeller's \$40M+ private investment was certainly not made on just a zero growth scenario. However, the FAA believes now that the airlines' zero growth operations numbers are valid. Why the stark contrast? How can zero growth be reconciled with this?
6. Without detailed terminal/ramp diagrams and information (sharing of ticket counters, gates, baggage carousels, TSA throughput, etc.) it is impossible to accurately determine the maximum terminal throughput. Where are the detailed terminal/ramp diagrams and information? Why were they not included?
7. This dearth of essential information suggests that these estimates are overly pessimistic by design. Why wasn't the terminal's full operational capability studied?

**Comment 9: Section 2.2.1 states that Snohomish County had limited discretion to deny and airline request to operate at the airport. However, the FAA has stated in writing that all direct and indirect costs of mitigation can be incorporated into rates and that the FAA can't force local tax dollars to be spent on such mitigation. The identification of impacts and mitigation is a critical NEPA requirement and a central reason for NEPA. So, reasonable rates include the ability to recover direct AND indirect costs.**

Questions:

1. Given the law has not changed in this regard, please explain why this reality was not included in your statement about what Snohomish County can and cannot do?
2. Costs cannot be directly thrust upon local taxpayers due to FAA and other federal laws, court rulings, rules and policy. Can you explain the absence of calling out this reality given the direct nexus to NEPA requirements and a huge concern of surrounding communities?

**Comment 10: The rectangular study area around the runway conveys landing and takeoff flight paths being in line with the runway. There are multiple flight paths shown with percentages of use. As we have learned from the SeaTac, flight paths create significant impacts as those experiencing them are voicing significant concerns; see the Seattle Times front page article on Sunday October 28, 2018.**

Questions

1. Can you clarify if the expected flight paths are lined up with the runway with no significant banking on or shortly after takeoff or landing?
2. Was consideration given on the south end of Paine Field to safely modify takeoff and landing flight paths to maximize being safely overhead of the ambient noise generated by main roadways like 525, 99 and I-5 in order to minimize noise impacts to quieter residential areas? If not, why not given this is a mitigation measure?
3. To the north of the runway, land use is predominately residential to the west and industrial and manufacturing to the east. Was consideration given to safely adjusting takeoff and landing flight paths to maximize time over industrial and manufacturing areas in order to be farther way from residential areas? If not, why not given this is a mitigation measure?
4. Was consideration given to procedures to balance takeoff using less runway to better contain the noise footprint depicted on Figure 5.8.2? If not, why not consider this potential mitigation measure?

**Comment 11: According to Section 5.2.3.1, air quality monitoring stations are located far from Paine Field.**

Questions

1. Can you provide specific explanations as to how monitoring stations 10 miles away in Marysville and 9 miles south in Lynnwood measuring only PM<sub>2.5</sub> are of benefit in evaluating emissions impacts from Paine Field?
2. Section 5.4 provides information on “existing condition (2017) indicating 120,288 metric tons of CO<sub>2</sub>. Can you explain how 120,288 tons of CO<sub>2</sub> emissions which is roughly the equivalent GHG emissions of 20,000 cars annually, was determined to be of no significant impact?
3. Can you explain what GHG emissions threshold the FAA determines to be significant and what methodology was used to determine that threshold?
4. The CO<sub>2</sub> emissions of roughly 20,000 cars is supposed to be an estimate of proposed action emissions yet the statement indicates that these are based on “existing” 2017 conditions. Can you explain why you did not evaluate proposed activity and reasonably foreseeable potential activities?
5. Can you please clarify how much of this inventory estimate is exclusively from proposed actions or from existing 2017 conditions or some mixture?
6. Why did APPENDIX D (Air Quality Analysis) only discuss methodology and protocol but did not include analysis and numbers. Where is the actual analysis?

**Comment 12: The Draft Supplemental EA states that the 2012 EA (which studied less activity) concluded that Paine Field would generate .03% of U.S. greenhouse gases and would not be significant.**

Questions:

1. The proposed activities would be greater than that studied in 2012 so what percentage of greenhouse gases would it be in 2024?
2. TABLE 6.4-1 and TABLE 6.3-2 are not able to be reconciled. How can the no action alternative GHG emissions in 2019 grow to the no GHG emissions for the no action alternative in 2024 by 13,000 tons while the proposed action contribution goes from 20,609 tons down to 1,935 tons in 2024? This reduction is calculated by determining the contribution of the proposed action numbers. That would require a “reduction” of over 90% for what this supplemental reports as the exact same activity. Does this error demonstrate an error in methodology?
3. After correcting the GHG emission contributions estimates for the proposed action (see above question), the analysis on the contribution to the targets set by the Washington State legislature and the City of Everett Climate Action Plan for Municipal Operations and the city of Everett’s 2035 Comprehensive Plan and Snohomish County’s Sustainable Operations Action Plan (SOAP) must be recalculated. Can you accurately report the actual contributions of the proposed action and how it would impact these targets and plans?
4. After correcting the calculations can you identify mitigation measures so this proposed activity does not undermine all of the climate action and sustainable action plans listed above? Can you include the estimated costs of such measures and who will pay for them?

**Comment 13: Section 5.15 discusses Water Resources, Stormwater and Drainage: The State of Washington is updating the Industrial Stormwater General Permit and has indicated some of the changes being considered.**

Questions:

1. How is Paine Field and Propeller complying with the current ISGP and preparing for the new ISGP?
2. Will taxpayer dollars be spent complying with the existing and/or new ISGP as they pertain to these proposed activities?
3. Does Propeller have a Stormwater Pollution Prevention plan and an Industrial Stormwater permit and shouldn’t that be described in the EA?

**Comment 14: Flight times have not been announced but the Draft Supplemental EA discussed overall and peak hours traffic without knowing or listing a range of flight times.**

Questions:

1. Without knowing flight times, how was the conclusion reached that 12.5% of the trips would be during peak-hours?
2. Can you define peak hours for each roadway and intersection?
3. Can you confirm that you did not just use one peak hour and instead looked at the entire peak load periods?

4. Was there a correlation to market demand for specific flight times coupled with the capacity to provide flights at those times?
5. How can only 278 vehicle trips be added to “peak hour” in both 2019 and 2024? Is this really just a peak hour?
6. Peak traffic will only get longer in the future so isn't using the estimate of 278 vehicle trips in 2019 and again in 2024 evidence of flawed methodology and artificially low estimate?
7. Did the vehicle trip estimates fully consider the reality that a percentage of travelers will be dropped off and then that vehicle proceeds onto a trip away from Paine Field and then repeats the two trips when the passenger returns generating the potential of 4 trips for a single passenger?

**Comment 15: Mitigation options were not specifically described.**

Questions:

1. Please list mitigation options for each impact?
2. Can you describe mitigation options that include things like flight paths over high ambient noise corridors instead of neighborhoods, time of day agreements with airlines, noise abatement programs and ongoing traffic mitigation funding?

**Comment 16: An appendix includes e-mails and correspondence to address tribal consultation. In a July 31, 2018 e-mail from the consultant Environmental Science Associates to Cayla D. Morgan, FAA Environmental Protection Specialist for the Seattle Airports District Office. One e-mail stated “Because the current project differs only slightly from the option evaluated earlier, we relied on the 2012 NEPA Environmental Assessment...”. The Draft Supplemental EA states the proposal without any increase in flights over 5 years will result in 656,235 annual enplanements in 2019 and 736,316 annual enplanements in 2024. The 2012 EA had proposed 112,000 annual enplanements for the initial year (2013) and 238,200 annual enplanements for the fifth year (2018).**

Question:

1. Given the proposed activity is almost 400% more than the startup activity studied in the original EA, does the FAA agree with its consultant that this nearly 400% increase is only a slight difference?
2. How much of difference is required to be considered significant?

**Comment 17: The FAA stated the EA had dated analysis.**

Question:

1. Is the Draft Supplemental relying on the original EA and dated analysis?
2. If so, why?
3. Can you identify which sections of the EA were relied upon and which were considered dated?

**Comment 18: Section 5.12 discusses Children’s Environmental Health and Safety Risks. Subsection 5.12.2.5 lists the schools closest to the terminal. There are many other schools and a ballpark (and others) that will be impacted by disruptive noise that stops activities and creates distractions which can increase safety risk.**

**Question:**

1. Why use a metric of proximity to the “terminal” only thereby leaving out ballparks, parks and schools with close proximity to the runway and noise profiles or impacts of increased traffic safety risks to children?

November 5, 2008

The Honorable Aaron Reardon  
Snohomish County Executive  
3000 Rockefeller Avenue  
Everett, WA 98201

Dear Executive Reardon,

We are writing to express our unified support for Paine Field's current role as an industrial airfield that supports Washington State's aerospace industry, general aviation and our communities. We expressly oppose efforts to bring scheduled passenger air service to Paine Field.

A significant concern is the impact passenger air service at Paine Field may have on Boeing and its operations. As the Prosperity Partnership noted in its signature report in September 2005: "the Central Puget Sound region is one of the world's few epicenters of aircraft and parts manufacturing." The heart of that epicenter is Paine Field, which Boeing uses to test and deliver its wide body planes. Snohomish County should do all it can to maintain and enhance Boeing's presence and primary assembly facility.

Commercial passenger aircraft would need to use the long runway at Paine Field, the same runway Boeing uses to test and deliver its production planes from the adjacent assembly facility. While there are other options than Paine Field for commercial passenger service, Paine Field is the only place Boeing uses for testing and delivery of wide body planes. With delivery deadlines slipping and order backlogs growing, it is unwise to further encumber Boeing and its workers.

Once the door to commercial passenger service at Paine Field is opened, the County and its citizens will find a slippery slope on the other side of the door. It will be difficult to control or limit the growth of commercial passenger service, and eventually commercial passenger flights will impede or somehow restrict Boeing activities. Whether that happens in five years or 25 years, it won't be a good thing for Boeing and for Snohomish County. The economic benefits from Boeing's presence at Paine Field clearly dwarf any net economic benefits from allowing commercial passenger service at Paine Field. These impacts and threats must be fully considered and communicated to the public.

We urge you to make every effort to implement vigorously the county's policy of "strongly discouraging" scheduled passenger air service at Paine Field. We do realize you and your staff are obligated to negotiate in good faith with the airlines that express interest in providing commercial air service to or from Paine Field. However, we are concerned that some believe FAA rules lock you into accommodating any airline that wants to schedule flights at Paine Field — this belief is wrong! Instead, we believe you can "strongly discourage" while still negotiating in good faith pursuant to FAA regulations by doing at least the following:

- Legally discourage scheduled air service by refusing to pay one dime towards subsidizing it. Investments in a passenger terminal, security facilities, baggage handling facilities, parking upgrades and related facilities are not appropriate, particularly now when the County is facing a budget deficit of at least \$21 million and perhaps considerably more. In addition to not having the money, the County has no way of ensuring continuing use of the facilities by commercial airlines, who are greatly impacted by economic and market conditions.
- Reject any offers that include subsidies of any kind from any source including efforts to subsidize the funding of capital improvement costs or guaranteed ticket purchase programs through publicly financed agencies such as the Economic Development Council.
- Reject any pleas for reduced or waived landing fees or other fees. The County should not offer any inducements to any airlines, particularly any which reduce expected income to the County. Fees should be reflective of the market rate using Sea-Tac Airport as a pricing standard.
- Require a full cost analysis to ensure you have identified all costs that must be paid for by the airline applicant(s). Include indirect costs in the analysis to determine what degree any such costs can be incorporated into county demands of the airline applicant(s).
- Embrace the role of lead permitting agency. Because Snohomish County owns and operates Paine Field, it is unquestionably the lead permitting agency for any proposed use of Paine Field for commercial air service. Snohomish County needs to be assertive in its role as the lead permitting agency and require adequate studies, environmental impact statements and full noise mitigation assessments to ensure understanding of all the impacts that will come with commercial air service. Once studies are completed, the County must then identify and require appropriate mitigation activities for these impacts.
- Require airline applicants to pay for environmental impact studies, noise studies, traffic studies and remediation studies, not only for a small number of flights but for the full potential of flight activity, particularly given the inability to limit flights once they begin.
- Implement aggressive passenger fees. Because the County will be on the hook for the potential of billions of dollars in noise mitigation costs, fees should reflect that liability.

These actions are consistent with the Mediated Role Determination, Federal law and FAA regulations. Your own attorney, Kaplan Kirsch Rockwell, issued an opinion in 2006 that validates this point:

“...airport proprietors have considerable discretion in deciding whether and when to make capital improvements. Equally important for present purposes, airport proprietors generally can decide on the precise nature and scope of the capital improvements. Indeed, airport users typically are responsible for reimbursing an airport proprietor for its costs to build new projects serving those users even if the users consider such projects to be imprudent and unnecessary.” (KKR Memorandum to Sno. Cty dtd 12 Oct 06, pp 27-28.)

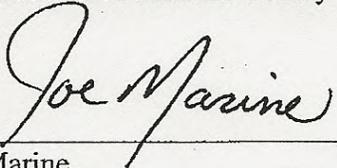
Snohomish County as proprietor of Paine Field has a wise policy to "strongly discourage" a change in the airport role thereby keeping commitments to citizens and communities while avoiding costly litigation, indirect costs, lost tax revenue from reduced property values, school, health, environmental, transportation and other adverse impacts. This policy induced our cities to rezone thousands of acres surrounding Paine Field (or under the flight paths) from light industrial to residential housing. Now this policy protects the billions of dollars of investment it created.

The policy also protects Boeing from being "crowded out" by passenger service as they ramp up production of the 787 and continue production of the 747, 777, and 767 (especially if Boeing wins the tanker contract). Boeing requires time on the main runway for taxi testing, flight testing and other important activity required for FAA flight certification. If Paine Field offers commercial service, would Boeing need to wait for inbound and outbound airlines? Or would airlines circle our neighborhoods while waiting for Boeing to clear the runway? Flight testing and scheduled airline service don't mix and we don't have clear answers about how to make it work. It's a risky proposition to impose costly delivery delays on our region's biggest employer.

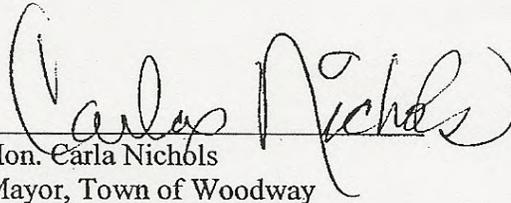
No wonder the county and our cities have supported the policy set forth in the MRD. Brier, Edmonds, Mukilteo, Lynnwood, Mountlake Terrace and Woodway, (representing more than 120,000 residents) have passed formal resolutions in support of the MRD and the current role of Paine Field and opposing scheduled passenger service.

We request you fully consider the bipartisan concerns and recommendations made on behalf of so many cities and Snohomish County citizens.

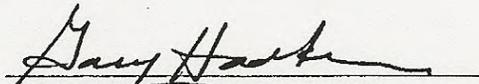
Sincerely,



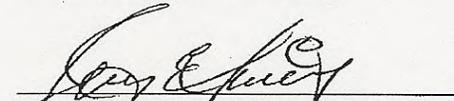
Hon. Joe Marine  
Mayor, City of Mukilteo



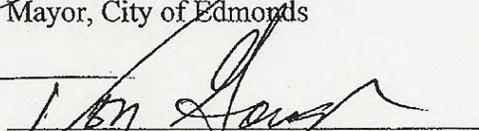
Hon. Carla Nichols  
Mayor, Town of Woodway



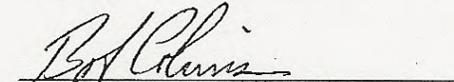
Hon. Gary Haakenson  
Mayor, City of Edmonds



Hon. Jerry Smith  
Mayor, City of Mountlake Terrace



Hon. Don Gough  
Mayor, City of Lynnwood



Hon. Bob Colinas  
Mayor, City of Brier

Enclosures: Resolutions opposing expansion of Paine Field from Brier, Edmonds, Lynnwood, Mountlake Terrace, Mukilteo and Woodway.

- c: Everett Herald
- Seattle Times
- Seattle P-I
- Mukilteo and Edmonds Beacon
- KIRO, KOMO and KING TV/Radio



U.S. Department  
of Transportation  
Federal Aviation  
Administration

P192

Northwest Mountain Region  
Seattle Airports District Office  
1601 Lind Avenue S.W., Suite 250  
Renton, Washington 98055-4056

December 12, 2005

Mr. Gregory W. Hauth  
President  
Save Our Communities  
P. O. Box 482  
Mukilteo, WA 98275

Dear Mr. Hauth:

Your November 19, 2005, letter, requesting clarification of the Federal Aviation Administration's (FAA) role in Snohomish County's management of its airport, has been forwarded to me for response. My responses to your questions are below. You may find additional information on an airport owner's obligations in FAA Order 5190.6A, Airport Compliance Requirements, Chapter 4.

1. Does the FAA actively force a change in the role of any airports from general aviation to commercial air passenger or air cargo?

*While the FAA provides expertise and guidance on growth planning, and compliance with grant assurances to airport sponsors, we do not force an airport to change its role from general aviation to commercial air passenger or air cargo. However, the FAA does have a statutory mandate to ensure that airport owners comply with Federal grant assurances under Title 49 USC subtitle VII, as amended, and surplus real property agreements. In order to receive Federal grant funds, an airport sponsor must agree to make the airport available as an airport for public use, on fair and reasonable terms, and without unjust discrimination, to all types, kinds, and classes of aeronautical activities.*

2. Is the FAA a party in community discussions about the future role of a general aviation airport? If not, can Snohomish County proceed to pass ordinances and resolutions without involving the FAA (assuming Snohomish county is aware of grant assurances regarding Paine Field.)? If so, would the FAA participate on a voluntary basis or on a required (regulatory) basis?

*During the master planning process, the FAA discusses the future role of the airport with the airport sponsor. At the request of the airport sponsor, the FAA occasionally participates in community discussions about the future role of an airport and may also review and comment on current or proposed ordinances and resolutions. However, our contributions are limited to providing guidance on regulatory requirements surrounding the airport's compliance with its grant assurances. These grant assurances apply to Snohomish County and as the sponsor of the airport, they should take appropriate action to assure that their rights and powers related to the grant assurances are not limited by other local jurisdictions. Snohomish County or other local governments are not required to*

*necessarily involve the FAA in developing its ordinances and resolutions, however, Snohomish County could be found in non-compliance if they were to approve of any ordinance or resolution that is contrary to their grant assurances.*

3. If a commercial carrier asks the FAA to enforce grant assurances, would the FAA require the airport operator (such as Snohomish County) to pay for upgraded facilities, terminals, baggage, parking, road and traffic improvements, and other direct or indirect costs necessary for an air carrier to operate?

*The prime obligation of the airport sponsor is to operate the airport for the use and benefit of the public. While the owner is not required to construct or upgrade facilities, it has the obligation to make available suitable areas or space on reasonable terms to those who are willing and otherwise qualified to offer flight services to the public (i.e., air carrier, air taxi, charter, flight training, crop dusting, etc). The airport sponsor has a duty to negotiate in good faith for the lease of such premises as may be available for the conduct of aeronautical services.*

4. Is it possible for the airport operator to allow operations on a non-discriminatory basis only if an interested air carrier(s) pay(s) for all such direct and indirect costs necessary to assess, plan, execute, operate and/or compensate the operator for all expenses and liabilities associated with such operations?

*Generally, yes. While an airport sponsor must allow all aeronautical users access to the airport on fair and reasonable terms without unjust discrimination, it may make reasonable distinctions among aeronautical users (such as signatory and non-signatory carriers) and assess higher fees on certain categories of aeronautical users based on those distinctions. The allowable rates and charges must be allocated by a transparent, reasonable, and not unjustly discriminatory cost allocation methodology that is applied consistently.*

*For costs that are not directly attributable to a specific user group the cost allocation methodology cannot require any aeronautical user or user group to pay costs properly allocable to other users or user groups. Indirect costs can only be included in the fees for aeronautical use if the cost allocation formula is consistently applied to other units or cost centers within the control of the airport sponsor.*

*There are many factors that may impact whether or not a specific rate or charge is allowable. For more detailed information please see the FAA's Final Policy Regarding Airport Rates and Charges published June 21, 1996 in 61 Federal Register 31994.*

5. If one or more air carriers ask the FAA to enforce grant assurances of an airport, and the airport operator chooses not to comply, what are the potential penalties for such non-compliance? What are the costs to the operator? Does the FAA have any history on imposing grant assurance enforcement penalties and if so, can you describe what those penalties and circumstances have been?

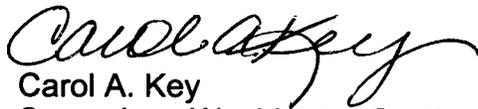
*If the FAA determines, after investigation, that an airport is in violation of its grant assurances and the airport sponsor refuses to implement corrective action, the FAA would place the airport in non-compliance and could withhold future federal funding.*

*Generally, the FAA seeks to obtain voluntary compliance from airport sponsors. However, the FAA has imposed enforcement penalties where the airport sponsor refuses to voluntarily comply with its grant assurances. These cases may be reviewed on the Department of Transportation's Docket Management System at <http://dms.dot.gov/search/searchFormAdvanced.cfm>. All formal complaints of compliance can be found by selecting "Advanced Search" and selecting the following information: At "return matching" select "Dockets"; for "agency" select FAA; for "category" select "non-rulemaking"; and for "subcategory" select "formal complaints". You may limit the search by date.*

6. If commercial air service flights commence at Paine Field, for either passenger service or air cargo, can the airport operator impose restrictions on operations, such as type of aircraft that can fly, the frequency of flights or time of day on operations?

*Generally, the airport may not impose restrictions on the type of aircraft, the frequency of flights, or the time of day of operations. The exception to this rule is if the restrictions are necessary for the safe and efficient operation of the airport. In such cases, the airport must have concurrence from FAA that the restriction is reasonable. In the event that FAA receives a complaint, Flight Standards and Air Traffic representatives will be consulted and appropriate studies (e.g., airspace, ground safety) may be initiated to determine if the restriction is reasonable and related to the safe and efficient operation of the airport.*

Sincerely,



Carol A. Key  
Supervisor, Washington Section

cc:

Paul Johnson, Seattle Airports District Office  
Matthew Cavanaugh, Manager, Safety and Standards Branch  
Dave Waggoner, Airport Director, Paine Field  
Tom Fitzpatrick, Snohomish County  
Donald L. Doran, Mayor, City of Mukilteo  
Ray Stephanson, Mayor, City of Everett

JAY INSLEE  
1ST DISTRICT, WASHINGTON



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FAX: (202) 226-1806

Jay.inslee@mail.house.gov  
www.house.gov/inslee

February 6, 2009

Ms. Carol Suomi  
Manager, Seattle Airport District Office  
Federal Aviation Administration  
1601 Lind Avenue, S.W., Suite 250  
Renton, Washington 98057

Dear Ms. Suomi:

Thank you for taking the time yesterday to address my concerns regarding the Federal Aviation Administration's perception of the negotiation process between Snohomish County and commercial air service providers at Paine Field.

Per our conversation, it was my understanding that the FAA had concerns regarding granting compliance and the length of time that the negotiation process has taken thus far. I am happy to hear that the FAA has not received any complaints from either airlines throughout this process and has received regular updates from Snohomish County. Further, it is my understanding that:

1. Snohomish County is currently and has consistently acted in good faith throughout its negotiations for commercial air service at Paine Field. The County was and continues to be compliant with the "good faith" negotiation requirement specified by FAA and statutory regulations.
2. At this time, Snohomish County remains in full compliance with all statutory requirements attached to FAA funding.
3. The current concerns regarding negotiations between Snohomish County and commercial air carriers have been resolved and will not prejudice Paine Field in FAA consideration of future discretionary funding or other potential funding streams.
4. The future of commercial flight activity at Paine Field lies with Snohomish County. However, if statutory requirements and grant assurances are not met at some future date, Snohomish County is aware of the potential consequences that may lead to a denial of future FAA discretionary funds.

Ms. Carol Suomi  
February 6, 2009  
Page 2

**P192**

While this process is a difficult one and it will take time for the County to reach consensus, I have the utmost confidence in the local elected officials and their intent to reach a timely and appropriate resolution. Thank you for your hard work and diligence on this issue.

Very truly yours,

A handwritten signature in black ink, appearing to read "J. Inslee". The signature is written in a cursive style with a large initial "J".

JAY INSLEE  
Member of Congress

JRI/pm

# Board of County Commissioners

## SNOHOMISH COUNTY, WASHINGTON

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ROLE FOR  
DEVELOPMENT OF  
PAINE FIELD SELECTED

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WHEREAS, Findings and Recommendation of the Snohomish County PLANNING COMMISSION have been filed with the Board of Snohomish County Commissioners in the matter of the SELECTION OF AN AIRPORT ROLE FOR PAINE FIELD, and,

WHEREAS, the Board did on the 29<sup>th</sup> day of March, 1978, set this 11<sup>th</sup> day of April, 1978, at the hour of 10:00 o'clock a.m., as the time for considering the Findings of fact and the Recommendations of the Planning Commission concerning the role for Paine Field, and,

WHEREAS, at such public meeting held this date, the Board of County Commissioners carefully considered the recommendations of the Planning Commission, the Airport Commission and all written material received thus far, and,

WHEREAS, the Planning Commission, after two public hearings at which several hours of citizen input and testimony were received, recommended to this Board that the Commissioners adopt a role for Paine Field to be entitled "General Aviation" (combination of Revised general Aviation and Do Nothing role), and,

WHEREAS, after having received and considered all documents and testimony submitted to this Board by the Planning Commission, Airport Commission and others, it appears to this Board that the recommendation of the Planning Commission should be followed with two modifications and two additional conditions being made by this Board of Commissioners:

1. There is widespread and well founded public concern in the Paine Field Study Area about the possible expansion of airport operations and/or facilities at Paine Field.
2. The Environmental Analysis Summary, supplemental technical evidence, and statements from the public indicate that any expansion of Paine Field, if not strictly controlled, could impose substantially increased adverse environmental impacts on a large number of existing and future Paine Field area residents.
3. There is a demand for improved and expanded light aircraft general aviation facilities in the Seattle - Tacoma-Everett region.
4. There is no clear justification for providing additional large transport air carrier or air cargo facilities at Paine Field, or at any airport in the region other than SEA-TAC, during the foreseeable future.
5. The Paine Field Study Area has been designated by elected officials of Snohomish County and affected cities as a major urban growth center. Major public and private investment, including development of an extensive system of public utilities and educational facilities, has already occurred to implement this growth policy. Furthermore, urbanization of the study area is continuing.

6. Failure to reduce the adverse impacts of airport operations on the community and control negative residential growth impact on aircraft activities will result in unnecessary social, environmental and economic hardship for the community, while jeopardizing legally and financially the County's substantial investment in airport facilities at Paine Field.
7. Future use and development of Paine Field must recognize and protect the rights of the Boeing Company to use these facilities as provided for in their long-term contract with the County.
8. The needs and interests of the municipalities surrounding Paine Field, including Everett, Mukilteo, Lynnwood and Edmonds, must be given full consideration by the County in determining the future use of this facility.
9. A wide assortment of noise abatement measures are available which can and should be effectively used at Paine Field to substantially reduce the adverse impact of present and future aircraft noise on the surrounding community.
10. Testimony by pilots based at Paine Field and affected residents of the community has raised serious doubt about the accuracy of the airport noise contour forecasts generated for this study and hence supports enactment of a major continuous noise monitoring program at Paine Field.
11. Citizen confidence in the commitment of the Airport staff, Airport Commission, and elected County officials to aggressively pursue programs to make the airport and surrounding community compatible must be created to avoid long-term major confrontations that will poorly serve the airport, County and community.
12. Serious unanswered questions have been raised by professional aviators based at Paine Field regarding location of a proposed new 3,100 foot light aircraft, general aviation, runway on the Bomarc site. Substantial doubts exist concerning:
  - A. development of a safe flight pattern to avoid a potentially dangerous intersection of aircraft using the new runway and those using runway 11-29;
  - B. The provision of adequate fixed based operator flight services to aircraft using the Bomarc runway;
  - C. provision of eventual taxiway access to the Bomarc runway from the main airport;
  - D. The acceptability of this runway for student pilot training stemming from such factors as
    - (1) The increased crosswind conditions caused by the 6! Canting of this runway away from the prevailing winds;
    - (2) The need for a second air traffic control radio frequency; and
    - (3) ...

In light of these findings and our knowledge gained from many hours of testimony and review of evidence, we recommend that a redefined aviation role for Paine Field be selected which would achieve some of the primary objectives of the Revised general Aviation role, while also protecting the interests of the Paine Field residential community, the airport, and the County by incorporating key elements of the Do Nothing role. We entitle this new role “General Aviation.”

The principal aviation objectives of the General Aviation role would be to retain and enhance light aircraft general aviation as the dominant aeronautical activity at Paine Field. This role would provide for a reasonable amount of airport facility expansion and modernization to accommodate the expected growth of this activity. Future aircraft operations would be keyed to the substantial growth rate projected in the Do Nothing role. This approach would impose strict control on any aviation activity with potential for adverse environmental impact.

In the event further analysis justifies its need, the principal new aviation facility provided under the general Aviation role could be a new light aircraft utility runway 3,100 feet in length. This new runway would be located west of Airport Road, rather than on the Bomarc property. The preferred site would be located approximately 3,300 feet east of the existing main north/south runway 16-34.

Expansion or improvements of other airport facilities primarily for light aircraft general aviation use would also be permitted under this role, subject to adequate mitigation of adverse environmental impacts. New or improved facilities would include new T-hangers, tie-down space, taxiways, navigational aids, and other necessary ground support facilities for light aircraft aviation. This role does not propose extension of the main north/south runway 16-34 or other existing runways.

Other aviation activities which would be encouraged to continue operation and expansion at Paine Field include: aircraft related industries, business and corporate aviation, public service aviation and air taxi service. Reasonable expansion of these activities would be permitted.

Existing aviation activities at Paine Field which would be strongly discouraged from expanding because of their inconsistency with the airport’s primary aviation role, as well as their unavoidable adverse impact on the surrounding community, include supplemental/charter air passenger service, large transport crew training, air cargo aviation, and military aviation.

A vigorous noise abatement program embodying the elements described in the Planning Department’s position statement should be included as an integral part of this redefined general Aviation role. We earnestly recommend to the Board of County Commissioners that steps be taken to begin implementation of this program before the next phase of the study is permitted to begin. It is our firm belief that all affected sectors of the airport community should be directly involved in developing and, as possible, implementing the detailed elements of a noise abatement program. The program should include at least the following:

1. Staffing of an Airport Noise Mitigation Program
  - A. The county should engage the services of a professional mediator when needed to work directly with the Paine Field Area community to resolve any differences that may arise between the operation of Paine Field and the citizenry.
  - B. The County should form a permanent Paine Field Advisory Council composed of local residents and airport users to provide advice to the County on important airport related issues.
  
4. Land Use Controls and Land Acquisitions **[Per the Mediation Panel, the “Land Use Controls and Land Acquisitions” section is to be amended according to the Snohomish County Planning Commission recommendations dated November 14, 1978]**
  - A. All noise impacted land inside Zone C Noise Exposure Forecast (NEF) 40+ should be converted to an airport-compatible, non-residential land use either by private development or through purchase by the County with a staged acquisition program following FAA guidelines.
  - B. Based upon the results of the noise monitoring system, the most severely impacted portions of noise impacted land inside Zone B (NEF 30-40) should be converted to airport-compatible, non-residential land uses whenever consistent with accepted land use planning principles.
  - C. The County should require or purchase appropriate aviation easements when granting approval of residential property requests inside Zone B (NEF 30-40).
  - D. The County should require that special noise insulation be added to all new residences constructed inside Zone B (NEF 30-40).
  - E. The County should pursue efforts to require that disclosure of airport noise impact be included on title reports for all property located in Zone B or Zone C when development or subdivision is proposed.
  
5. Community Assistance Program
  - A. Existing Residences located in noise impacted areas with aircraft noise levels of NEF 35-40 should be provided with a guarantee of purchase by the County if so desired by the affected owner.
  - B. A County sponsored cost sharing program to purchase noise insulation materials should be offered to the owners of all existing residences in Zone B (NEF 30-40).
  
6. Control of Military Aircraft Activities at Paine Field **[The “Control of Military Aircraft Activities at Paine Field” section is replaced with the Paine Field Noise Abatement Procedures developed by airport users and adopted by the Snohomish County Airport Commission on September 13, 1978]**

The County should attempt to renegotiate the lease with the U.S. Army Reserve Helicopter unit dated March 22, 1978 for a period of time shorter than the 20 years specified.

In conclusion, we present our findings, which expressly support the selection of the new redefined General Aviation role:

1. The General Aviation role will permit reasonable airport expansion to continue at Paine Field
2. The General Aviation role will impose a minimum amount of adverse environmental impact on the Paine Field area community.

3. The General Aviation role will cause the least disruption to existing land use patterns around Paine Field.
4. The General Aviation role will provide the best opportunity to both preserve and expand the existing airport industrial park.
5. The General Aviation role will provide the greatest economic benefits to the County with the least economic and environmental costs.
6. The General Aviation role will best serve the future needs of light aircraft general aviation. The principal aeronautical activity at Paine Field.
7. The General Aviation role will ensure that light aircraft general aviation will remain the dominant aeronautical activity at Paine Field for the foreseeable future.
8. The General Aviation role will limit the expansion of aviation activities at Paine Field which are least compatible with its dominant aviation role and which would impose the most severe adverse environmental impacts on the surrounding community.
9. The General Aviation role will provide the County with the best opportunity to successfully implement an aggressive, long-term noise abatement program at Paine Field.
10. The General Aviation role will protect the rights of the Boeing Company to use the airport facilities at Paine Field as outlined in their long-term contract with Snohomish County.

It is further recommended by the Planning Commission that the Paine Field Annual Air Show and other such community sponsored events continue to be permitted at the Snohomish County Airport at Paine Field.

On a motion duly made, seconded and UNANIMOUSLY approved, the Planning Commission further recommends to the Board of County Commissioners of Snohomish County that should at any future date further study be done relative to the Paine Field Community Plan, the body studying said Plan be constituted in such a manner as to involve local citizens, airport users, qualified technical staff and an advisory committee; and be patterned along the lines of the Citizens' Advisory Committee which drafted the Snohomish County Shoreline Master Program.

Board of County Commissioners Conditions:

1. Two additional members are to be added to the Airport Commission - one to represent the residents in the immediate area of the airport and the other to represent the Airport pilots.
2. This Paine Field Community Plan shall be subject to periodic review, so once noise levels and patterns are set at an acceptable level, Paine Field may take advantage of technological and operational improvements.

W H E R E A S, it further appears to this Board that:

1. There were no irregularities in the action taken on this matter, and the Hearings by the Planning Commission were conducted fairly and in good faith.
2. The Findings of the Planning Commission are in the best interests of the general welfare of the people of Snohomish County.

N O W T H E R E F O R E, B E I T R E S O L V E D, that pursuant to the Findings of fact as set out above, this Board hereby ADOPTS the "GENERAL AVIATION" role for the PAINE FIELD COMMUNITY PLAN.

COPY RECEIVED:

PLANNING\_\_\_\_\_

AIRPORT\_\_\_\_\_

EVERETT PLANNING DEPARTMENT\_\_\_\_\_
(Gary Doughty)

Done in regular Session this 11th day of April, 19 78

ATTEST:

HENRY B. WHALEN
County Auditor and Ex-Officio Clerk of the Board

Chairman

Commissioner

By: \_\_\_\_\_

Commissioner

Constituting the Board of County Commissioners
of Snohomish County, Washington

# SAVE OUR COMMUNITIES

P.O. Box 482 Mukilteo, WA 98275

[www.socnw.org](http://www.socnw.org)

February 5, 2010

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

Dear Ms. Morgan:

In response to the request for comments on the draft Environmental Assessment (EA) for Snohomish County (Paine Field) airport, please find our comments and requests enclosed. We ask for a detailed response to questions posed and to our requests for additional action.

## **Executive Summary**

Our comments focus on three major issues based not only on the EA, but also on the process used to begin the EA.

First, the FAA engaged in coercion of Snohomish County to sway a vote by the County Council in favor of terminal construction. The FAA pre-empted its own rules and, by forcing that vote, created the basis to start the EA. Details that demonstrate such coercion are provided herein. Although internal FAA communications demonstrate restraint and a commitment to a more fair process by most, there are others in the FAA seemingly committed to getting airlines into Paine Field no matter what the cost to the public.

Given the documentation we have, we will be recommending an independent agency, such as the GAO and/or Washington State's Auditor, initiate an investigation immediately into the overall process and conduct of all involved officials at the FAA, Paine Field airport or third-party contractor to determine compliance with applicable rules, policies and existing laws. Upon completion, the investigating agency needs to refer findings to the Department of Justice or other appropriate law enforcement agency.

The FAA's overzealous drive includes the failure to hire a truly independent third-party contractor and the failure to direct that contractor to pursue a fair, unbiased and comprehensive analysis that genuinely meets the intent and purpose of NEPA. We ask that a new, qualified contractor be identified based on a proper bidding process.

In view of these findings, the EA should be negated in favor of a properly scoped Environmental Impact Statement (EIS). The County Council's vote was coerced, so the entire process leading up to such coercion should be reviewed with the Council having the opportunity to reconsider its vote.

We are copying the Snohomish County Council and County Executive on this letter. As stated in our letter of January 15, 2010 to the County, we urge the County to rescind its request for FAA terminal construction funds that effectively subsidize Horizon and Allegiant. The County's position of discouraging commercial service within FAA's legal requirements includes the County's stated policy to "insist that an airline pay its own way and mitigate its impacts." (MRD Report May 16, 2007.)

In support of the County's freedom to act without coercion, we specifically request that the FAA demonstrate clearly to the County that discretionary funds are, in fact, not jeopardized by any action that the County takes, or does not take, with respect to funding a terminal, and that the County fully complies with FAA rules whether or not the County chooses to subsidize terminal construction. The FAA must take whatever other steps necessary to reverse the poisonous atmosphere it created by its coercive actions.

Secondly, we believe the EA is fatally flawed based on its scope. Full details are provided herein. We ask that if actions proceed to change Paine Field from a Class IV to a Class I airport that an EIS is conducted with a scope based on full capacity of the airport and full impacts and mitigation accounted for. The FAA rules on economic non-discrimination do not allow for local restrictions other than those that are safety related. That means no restrictions on the number and frequency of flights or the time of day they occur. The potential activity levels associated with changing the role of the airport are akin to looking at the maximum activity of a new commercial airport or new runway at SeaTac. The limited scope of the draft EA based on airline intentions hardly gets at this larger picture. Sea-Tac's 3<sup>rd</sup> runway analysis was not based on a few daily flights so it is reasonable to expect opening another "new" scheduled service runway/airport in the region would get no less of an analysis. Additional specific requests for the EIS are included in the "Conclusions" section of our comments.

Finally, we provide comments outlining a number of substantial environmental concerns that the draft EA failed to address adequately due to the modest scope and/or flawed assessment methodology. We would expect that an EIS would address these substantial environmental concerns by outlining a plan to analyze, mitigate, and assess payment for them to the airlines at Paine Field. A failure to do this represents an unacceptable

social, economic, and environmental liability to the taxpayers and municipalities of Snohomish County.

Sincerely,

Save Our Communities (SOC)  
President, Officers, Board  
On behalf of SOC members

Cc:

Snohomish County Council  
Snohomish County Executive  
Senator Patty Murray  
Senator Maria Cantwell  
Congressman Jay Inslee  
Congressman Rick Larsen  
Governor Christine Gregoire  
Senator Paul Shinn

Representative Marko Liias  
Representative Mary Helen Roberts  
Mayor Joe Marine (Mukilteo)  
Mayor Gary Haakenson (Edmonds)  
Mayor Don Gough (Lynnwood)  
Mayor Carla Nichols (Woodway)  
Mayor Jerry Smith (Mountlake Terrace)  
Mayor Bob Colinas (Brier)  
Secretary Paula Hammond (DOT)

## Table of Contents

<b>Process Flaws and Violations of Law/Policy/Precedence.....</b>	<b>5</b>
<b>Part I: FAA Threats Forced Snohomish County to Pass Terminal Resolution .....</b>	<b>6</b>
<b>FOIA Obtained Documents; Flawed EA Consultant Selection .....</b>	<b>6</b>
<b>Part II: EA Scoping is Improper, Creates Fatal Flaw: Does Not Comply with NEPA .....</b>	<b>13</b>
Sole Source Consultant Selection a Conflict of Interest Violation – EA Invalidated.....	21
<b>Part III Comments on impacts that the EA failed to address.....</b>	<b>24</b>
Compatible Land Use: Significant Land Use Compatability Issues exist.....	28
<b>SOC’s Overall Conclusions .....</b>	<b>47</b>

## **Process Flaws and Violations of Law/Policy/Precedence**

These comments point out flaws and violations of law, rules, orders and policies involved throughout this entire EA process. We have acquired documents and communications through the Freedom of Information Act (FOIA) and will reference only a portion of those in our comments, reserving the ability to use them in different actions in the future. As a result, these comments are not intended to convey an exhaustive listing or description of all the flaws, violations and concerns. Given the possibility of formal complaints and/or legal actions we reserve the right to add to or modify this list in the future. In addition, since these comments are provided in response to NEPA and not in response to a SEPA hearing, (which has not occurred yet), we reserve the right to provide additional information pertinent to SEPA at a later date. For ease of reference the following list summarizes the major issues discussed in this document.

**Part I** FAA threats forced Snohomish County to pass terminal resolution

FOIA obtained documents; Flawed EA consultant selection

**Part II** EA scoping is improper, creates fatal flaw: does not comply with NEPA

**Part III** Comments on impacts that the EA failed to address

## Part I: FAA Threats Forced Snohomish County to Pass Terminal Resolution

### FOIA Obtained Documents; Flawed EA Consultant Selection

#### *Without a resolution would there have been an EA?*

Summary. The FAA coerced Snohomish County into authorizing the construction and payment of a terminal against both the County's wishes and against FAA's own rules. Its actions poisoned the atmosphere for negotiations and for unbiased consideration, creating bad faith and forcing a decision by the County Council that may not have happened in a less threatening environment. The FAA should acknowledge that such threats were improper and the County Council should have the opportunity to reconsider its decision to pay for a terminal, or have the prospective airline applicants pay for a terminal, in an environment devoid of threats from the FAA. The FAA, and specifically Carol Suomi, Manager, Seattle Airports District Office, has taken positions that seem to pervert the discretionary grant program by misuse of the grant assurances in an effort to compel and direct the County to do what she wants. Under such circumstances, this entire EA should be invalidated since it is premised on wrongful actions and on a terminal that have significant design changes if airline applicants pay for its construction. Support for this argument is provided below.

In a legal memorandum written by Kaplan Kirsch Rockwell<sup>1</sup> on 7 Jan 2009 for the County about its obligations with respect to scheduled air service, the law firm writes:

"In summary, the FAA has opined that, when it receives a proposal to initiate commercial service, an airport sponsor like Snohomish County:

- **Is not required to construct facilities to accommodate the carrier if such facilities do not already exist."**

This finding is consistent with a letter from the FAA to Save Our Communities dated 12 Dec 2005 (enclosed), where the FAA stated the following:

**SOC:** "Does the FAA actively force a change in the role of any airports from general aviation to commercial air passenger or air cargo?"

**FAA:** "While the FAA provides expertise and guidance on growth planning, and compliance with grant assurances to airport sponsors, **we do not force an airport to change its role from general aviation to commercial air passenger or air cargo.**"

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<sup>1</sup> Memo from Kaplan Kirsch Rockwell to Snohomish County, "Obligations to accommodate commercial Air Service", 7 Jan 2009, p. 4

**SOC:** “If a commercial carrier asks the FAA to enforce grant assurances, would the FAA require the airport operator (such as Snohomish County) to pay for upgraded facilities, terminals, baggage, parking, road and traffic improvements, and other direct or indirect costs necessary for an air carrier to operate?”

**FAA:** “The prime obligation of the airport sponsor is to operate the airport for the use and benefit of the public. **While the owner is not required to construct or upgrade facilities**, it has the obligation to make available suitable areas or space on reasonable terms to those who are willing and otherwise qualified to offer flight services to the public (i.e. air carrier, air taxi, charter, flight training, crop dusting, etc.) The airport sponsor has a duty to negotiate in good faith for the lease of such premises as may be available for the conduct of aeronautical services.”

Finally note: The County only has an obligation to “negotiate in good faith” with prospective air carriers. The County’s own attorney states:

“... federal law and FAA regulations **do not require that negotiations with a prospective carrier be successful**...”<sup>2</sup>

**Summary:** the County is not required to fund a terminal, negotiations in good faith need not be successful, and the FAA does not force a role change. A reasonable “arms length” negotiation between the County and prospective air carriers should take place.

However, in February of 2009, the County Council is suddenly considering a motion to pay for funding a terminal. According to the January legal memo:

“FAA staff has explained that, if the County is unwilling to make the minimal investment to build a terminal for these carriers, FAA will reconsider its historical level of funding for Paine Field. More seriously, as explained above in footnote 3, the County could jeopardize over \$70 million in *discretionary* funding under the proposed federal economic stimulus package. The FAA is watching the actions of the County closely; the agency has a long track record of using discretionary grants to convince an airport proprietor to act in a manner consistent with the FAA’s policies.”

“If the FAA were to withhold discretionary grants, the County would risk losing funding for projects that directly support Boeing’s operations and provide an incentive for Boeing to remain at Paine Field.”<sup>3</sup>

On January 7, 2009, Carol Suomi wrote:

“... I believe it is time to push them harder to move towards commercial service. There is a County Council Meeting next Monday, and I would really like to have this out by Friday of this week.”

And in another quote:

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<sup>2</sup> Ibid 1, p. 7

<sup>3</sup> KKR memo p. 11

“... In conclusion, the bottom line is that county must provide concrete evidence, such as a signed contract, that they will meet their grant obligations before we would award discretionary funds towards any requested projects”<sup>4</sup>

Apparently, the FAA has created a basis for funding a terminal or ... risk losing Boeing.

The FAA has provided discretionary grants to Paine Field for 45 years. It then threatens to withhold those grants unless the County builds a terminal for private commercial carriers. This is very troubling because the FAA is essentially blackmailing the taxpayers of Snohomish County. This also violates the FAA’s Airport Improvement Handbook (FAA Order 5100.38C) that states in part 25 (g):

“(1) Projects funded with any discretionary funds should be based on the national priority system in Paragraph 320.”

In other words, the FAA should manage discretionary funds according to its objective rules, not according to subjective desires of its local administrators.

**Please respond:**

1. Why did the FAA claim that \$70 million of discretionary funding from the stimulus package was at risk?
2. How did the FAA know this on January 7, 2009 before the new President was inaugurated and before Congress passed the stimulus bill?
3. Are Boeing activities considered high in the national priority system?
4. How much of the discretionary funding given to Paine Field was for projects necessary to ensure Paine was in serviceable condition for Boeing and related activities?
5. Is the FAA intending to circumvent its own AIP Handbook to fund a terminal beyond the limit of \$200,000 per year?
6. Did the FAA successfully suggest using entitlement funding from other airports to help fund the terminal? Did any airports that gave up their entitlement funding of \$150,000 receive “any” discretionary funding after transferring their funds to Paine Field for terminal construction?

As of February 4, 2009, no stimulus bill had passed, yet these fictional dollars are at risk.<sup>5</sup> This denies them any credibility. They have created fact out of fiction to sway the County Council and the public.

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<sup>4</sup> E-mail from Carol Suomi (FAA) to Donna P. Taylor (FAA) dated 02/03/2009

<sup>5</sup> The American Recovery and Reinvestment Act of 2009, abbreviated ARRA (Pub.L. 111-5), is an economic stimulus package signed into law by President Obama on February 17, 2009

The FAA's threat to remove discretionary funding at Paine Field, when they KNEW it could negatively affect Boeing, was a pre-emptive move to force a role change. This violates FAA's own policy. As shown by documents obtained by SOC from a Freedom of Information Act Request, the FAA gets involved in discussions with an airport proprietor only AFTER a carrier has filed a formal complaint AND the airport proprietor has failed to resolve that complaint. The quote from an FAA memorandum shows this:

**Enforcement** – "If Snohomish County declines Allegiant Air's proposal Allegiant may pursue a formal complaint under 14 CFR Part 16, Rules of Practice for Federally Assisted Airport Enforcement Proceedings, against PAE. 14 CFR Section 1623(a). Allegiant must "initiate and engage in good faith efforts to resolve the disputed matter" with PAE prior to filing a Part 16 complaint. 14 CFR Section 16.21(a). If the FAA determines under Part 16, that PAE is in violation of its grant assurances, the agency may issue a compliance order terminating eligibility for future grants or suspend payment of grant funds."<sup>6</sup>

The airlines had not formally complained yet the FAA, under Carol Suomi's direction, persisted. Even internal FAA memoranda confirm that Ms. Suomi was over-stepping her authority. See below. (Emphasis added)

"Carol,

I have numerous concerns with this letter and do not believe it is wise for us to send it. While I agree that we need to ensure that the airport does not deny access to either Horizon or Allegiant, I believe we need to be careful not to enter into the political fray. The following are my initial concerns with the letter:

1. Have we received correspondence directly from Horizon or Allegiant claiming that the County has not been negotiating with them or has been denying them access? **If we haven't, we really don't have much to go on in alluding to the idea that the County is not negotiating in good faith or is denying them access.**
2. We mention Horizon's goal to initiate service on April 1, 2009 and stress that it's important to complete negotiations and move forward. Since this is Horizon's timeframe goal and not an FAA goal I do not believe we should have a role in pressing for or encouraging the timeframe. **These are private sector negotiations that we should not take a position on.**
3. We refer to any delay or lack of negotiations could be perceived as action contrary to your grant obligations. Do we have any information from Horizon or Allegiant on how the County is delaying or not negotiating? This is a pretty general statement and not tied to denying access.
4. The 2<sup>nd</sup> paragraph is a bit unclear as it discusses the stimulus package (which I don't think we have confirmation of yet) being discretionary funds. This is true, however, one could read the paragraph to mean that we would withhold any discretionary funds. **In order to withhold discretionary funds we need to have found: (1) formal non-compliance under Part 16, (2) Land Use violations on the report to congress, (3) that the airport clearly remains in**

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<sup>6</sup> FAA Memorandum To Associate Administrator for Airports From Donna Taylor, ANM-600 Prepared by: Joelle Briggs, ANM-626, 425-227-2626 Friday, May 23, 2008

**non-compliance despite FAA requests for corrective action or (4) the violation must be so egregious as to preclude additional Federal financial assistance until the issue is resolved.** I don't think we've reached these points yet at Paine Field. Especially, if we haven't received any request for assistance from Horizon or Allegiant.

5. In the 3<sup>rd</sup> paragraph, I do think it is fine to provide guidance to the airport on aspects that should be in the ground lease if they choose that route. Our bullets in this paragraph are good and could be conveyed to the County as something that they should seriously consider if they structure a ground lease.
6. **Finally, our statement that a failure to negotiate in good faith may subject them to enforcement action is a bit general and strong.** Instead, it is the denial of access that results from a refusal or failure to negotiate that would be the basis of a complaint. We would not take the enforcement action, unless a complaint was filed. **The first sentence sounds like we would take the enforcement action.”**<sup>7</sup>

At SOC's request, Congressman Jay Inslee called Ms. Suomi on February 5, 2009 to discuss concerns raised by the FAA's heavy-handedness the day AFTER the County Council voted for the terminal. Representative Inslee memorialized his conversation with Ms. Suomi in a letter dated February 6, **copy enclosed**. This confirms further that the FAA had received no complaints from the airline applicants and that Snohomish County was negotiating in good faith.

These documents also confirm that the FAA was acting pre-emptively against Snohomish County to force a role change of Paine Field. They enforced this threat with the potential loss of discretionary funds. The following email further supports this:

**From FAA Seattle Airports District Manager (emphasis added):**<sup>8</sup>

“I was discussing the issues with Paine Field with Roman, and he explained to me that there is another tactic that we could take (and is one that the Denver ADO has found to be very effective). To me, it's even a harder line...but maybe it works better for you all.

**The suggestion is to just tell them that we will hold back from giving them any additional discretionary funds until they have successfully negotiated leases with both Allegiant and Horizon Air.** Simple as that – and put the burden back on the County.”

A Snohomish County EDC e-mail confirms the threat as follows:

“Today, I caught wind that the FAA has moved beyond ‘will or may’ suspend federal discretionary dollars to they “have suspended” those dollars. So I called Carol Suomi, Manager of the Seattle district office of the FAA, who manages the grants for the northwest. She confirmed with me that the FAA had indeed **suspended** discretionary grants .... and that until there is a deal struck with

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<sup>7</sup> Joelle Briggs/ANM/FAA memo to Carol Suomi and cc to others in the FAA 01/08/2009

<sup>8</sup> Carol Suomi/ANM/FAA email to Roman Pinon, Stan Allison, Tim Shaw, Cayla Morgan, Bill Watson all FAA on 01/08/2009

Horizon for a lease and an adequate terminal **that** those dollars and any stimulus dollars will not be issued.”<sup>9</sup>

The FAA’s heavy-handed tactics worked. In a 4-0 vote of the County Council on February 4, 2009 the Council voted to build a terminal.

As reported in the Everett Herald (2/5/09)

“The Snohomish County Council **had no realistic choice** Wednesday when it gave the county executive directions for negotiating a deal to bring commercial passenger service to Paine Field. It had to follow the law, and by a 4-0 vote, it did.

Dave Gossett, ever the practical voice of the council, put it best when he said, ‘**I’m not willing to play a high-risk game of chicken with the FAA that could result in a loss of airport grant money** and help push the Boeing Co.’s widebody manufacturing to another state.’

Later, in a written statement -- notable for its conciliatory tone toward the council -- Executive Aaron Reardon pointed out that the Federal Aviation Administration ‘**has strongly warned that Snohomish County cannot stand in the way of commercial flights, or it risks losing tens of millions of dollars in federal grants**’ for airport improvements, funding that’s critical to Boeing’s long-term success here.”

***Please respond:***

1. Why did the FAA violate the public trust, its own rules and possibly Federal law, while creating a high stakes, high-risk game involving the nation’s largest aerospace manufacturer?
2. Why is the FAA advocating so aggressively for Horizon & Allegiant airlines?
3. Why did the FAA break its own stated rules in the AIP Handbook and its stated position to SOC in its letter of Dec 5, 2005 letter that it does not force a role change?
4. Why did the FAA act pre-emptively when it had received no complaint by any airline?
5. In view of these findings, why should the EA not be negated? Alternatively, why should an EIS not be done?
6. Has the County now received \$70 million of stimulus funding that the FAA allegedly held in abeyance pending the County’s vote? What is the status of the \$70 million of stimulus funding that the FAA said was in jeopardy?

The County Council’s vote was coerced, so the entire process leading up to such coercion should be reviewed with the Council having the opportunity to reconsider its

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<sup>9</sup> Mike Deller, Bank of Everett e-mail to Snohomish County EDC February 02, 2009 4:53 PM obtained via FOIA request as Airport Director Waggoner forwarded to FAA

vote. The Council should be able to consider giving the airline applicants the opportunity to pay for the terminal and other improvements at Paine Field without taxpayer subsidies. Following such decisions by the County, only then can an EIS be considered, possibly based on a terminal paid by the airlines themselves.

We specifically request that the FAA apologize for such coercion, that the FAA demonstrate clearly to the County that discretionary funds are, in fact, not jeopardized by any action that the County takes, or does not take, with respect to funding a terminal, and that the County is in full compliance with FAA rules whether or not the County chooses to subsidize terminal construction. The FAA must take all necessary steps available to clear the poisonous atmosphere it created by its coercive actions.

## **Part II: EA Scoping is Improper, Creates Fatal Flaw: Does Not Comply with NEPA**

### **Public Considered the Opposition**

After forcing a County Terminal Resolution, the FAA turned towards addressing NEPA barriers and dealing with the “opposition”, a term Ms. Carol Suomi used in internal communications. Apparently, the very public being protected by NEPA is considered the “opposition” by the senior FAA official responsible for threatening the County and influencing the scoping of the NEPA process – a process that minimized the public’s role.

### **Please respond:**

1. Is Ms. Suomi the official responsible for making the final decision on the EA disposition (FONSI or EIS)?
2. What are the criteria and procedures for requesting that an official be recused from a decision if they are found to be compromised in their ability to make an unbiased and objective decision?

### **FAA Denies Wanting Airlines in Paine Field**

The FAA spokesperson following the third EA hearing was quoted in the Everett Herald stating that the FAA was not taking a position on whether airlines should be at Paine Field but was following the law – apparently, this spokesperson had not checked with the FAA Seattle Airports Manager, Ms. Suomi, who built a record through multiple internal and external FAA communications demonstrating a focus on getting airlines into Paine Field.<sup>10</sup> This is just one thread of communications that reveal a mindset and focus on a predetermined outcome. The preponderance of documented communications creates the inescapable conclusion that this same mindset and focus influenced the approach to NEPA and the limited, flawed design and scope of the EA.

### **FAA Seeks Least Resistance NEPA Compliance Path**

FAA considered no EA at all: FAA internal discussions demonstrate an inconsistent understanding of NEPA requirements. This conclusion is based on FOIA obtained internal FAA discussions that initially focused on using a Categorical Exclusion determination. A Categorical Exclusion approach would have allowed the FAA to avoid having to do an Environmental Assessment (EA) or a more comprehensive Environmental Impact Statement (EIS) altogether.

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<sup>10</sup> Numerous e-mails obtained via a FOIA request provided by the FAA to SOC

Eventually, FAA internal discussions led to a sharing of documents pointing out that the FAA had to at least conduct an EA if not an EIS for all the federal actions being considered. Once the FAA accepted this reality internally, the focus turned to scoping, consultant selection and funding. Approaches to all of these were flawed as shown below. The FAA still pursued their streamlined and simplified approach to drive towards a predetermined outcome – see the following quote:

“That said, it looks like an EA can be prepared that **would** document that there are no significant impacts without a lot of time and expense. A 30 day comment period will be needed, **but that certainly doesn't stop a project**, it just means that we will likely have to provide responses to comments in the final EA” (emphasis added)<sup>11</sup>

**Please respond:**

1. If the outcome is predetermined and public comments don't matter because the project will continue in any event, then please answer how the intent, spirit and requirements of NEPA have been met?
2. Does the FAA intend to assess and incorporate public comment or disregard the public entirely and issue a pre-determined FONSI?

**Scope is Flawed, Limited and Designed to Support a FONSI**

**FONSI was the goal before the EA started:** There was internal acknowledgement that the scope would be the key to the EA's outcome: a narrowly defined scope would produce the desired outcome of having the EA result in a Finding Of No Significant Impact (FONSI). Furthermore, EA draft timetables dated as early as January 29, 2009 listed the conclusion as a FONSI even before the scope was finalized and consultants selected. Clearly, once the Categorical Exclusion option was ruled out, the FAA pursued the next least onerous outcome by conducting an Environmental Assessment that results in a FONSI with virtually no consideration of the possibility that an EA could result in significant impacts requiring an EIS. The FAA's confidence may be rooted in the fact that they set the rules, direct the scope, “approve” the forecasts, hire the third-party contractor and then they determine if the work they choreographed was adequate to support a FONSI. There appears to be no real checks and balances in this approach outside of political pressure or legal action.

**Please respond:**

1. Why did all the timeline schedules starting with the January 29, 2009 timeline end in a final step FONSI (Finding Of No Significant Impact)?
2. Is it true that an EA can result in moving to an EIS?

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<sup>11</sup> Cayla Morgan/ANM/FAA e-mail to Carol Suomi/ANM/FAA dated 01/29/2009

3. Does the absence of the EIS option in the timelines as a possible result indicate a bias and predetermined thought process by those involved? If not, then why wasn't the potential of an EIS option considered?

Minimal forecasts not sufficient for acceptable EA: Internal FAA communications and interaction with Paine Field staff on scoping included whether to use or modify Terminal Area Forecast numbers and whether to use Allegiant and Horizon forecast flight and passenger forecasts.

Forecasted numbers do not account for “potential” activity levels over a long timeframe. Allegiant forecasts a 400% increase in 5 years in the number of cities that they will serve out of Paine Field and a 500% increase in the number of flights. Even this minimal forecast shows a significant growth rate pointing to continued rapid expansion beyond 5 years. Even the FAA states that “The purpose of an EA is to determine whether a proposed action or its alternatives has the potential to significantly affect the environment.”<sup>12</sup> **Potential** does not mean minimal or limited. Therefore the FAA requires itself to assess **potential** capacity and the associated **potential** impacts of changes precipitated by federal actions including changing the operating certificate of the airport to allow for unconstrained commercial flight activity. The EA limited scope provides a prima facie case of a failure to comply with this clear and logical requirement.

Horizon does not commit to own forecast: In a letter to Paine Field airport staff from Horizon, the airline states “This information may not accurately reflect the actual number of operations, aircraft types, number of passengers carried, etc. at any given time and also does not constitute an offer, proposal, agreement or commitment of any kind by Horizon Air.”<sup>13</sup> Even with this qualification by Horizon, the FAA and Airport staff accepted it as good enough to assess environmental and public impacts. We find this unacceptable. Horizon has no accountability to the FAA or to the community should they choose to expand operations well beyond these initial estimates. Relying upon a forecast the airline itself does not “accept” cannot be defended as a legitimate assessment of the reasonably foreseeable potential activity encouraged by these federal actions.

**Please respond:**

1. Why was the EA based on minimal flight activity and passenger levels provided by Horizon and Allegiant? What were their forecasts based on?
2. If Horizon won't commit to their own forecast then why should the County and the FAA?

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<sup>12</sup> FAA Order 1050.1E CHG1 Section 201b and in multiple other sections as well

<sup>13</sup> Horizon Air Letter to William Dolan dated March 15, 2009

3. Under what federal law or rule would Horizon, Allegiant, the County or the FAA be bound by these forecasts? What is the penalty for creating impacts beyond these minimal forecasts?
4. Why didn't the FAA comply with FAA Order 1050.1E CHG 1 requiring assessment to determine if the proposed action or its alternatives have the potential to significantly affect the environment?
5. Why does the FAA and this EA fail to identify mitigation actions associated with the potential to significantly affect the environment?
6. What is the FAA's definition of "potential"?
7. Does the FAA intend to enforce economic non-discrimination requirements to ensure unconstrained scheduled commercial air service if the Operating Certificate is changed from Class IV to a Class I Certificate?
  - a. If Allegiant and Horizon initiate commercial air service at Paine Field, will the FAA allow the County to limit their activity to 10 flights a day for Horizon and 10 flights a week for Allegiant?
  - b. Will the FAA allow the County to place any limit on Allegiant and Horizon flights and passenger throughput so long as such activity complies with safety and security operations?
  - c. If the FAA does not allow restrictions, then how does the FAA reconcile using a limited scope of assessment?
8. Boeing has announced a three to five hour flight next week and the aircraft is not certified and therefore considered by FAA to be an experimental plane. If Horizon and Allegiant were operating scheduled commercial air service at Paine Field would the FAA allow the Boeing flight and airfield closure to take priority over scheduled Horizon and Allegiant flights? If not, then why aren't potential impacts to Boeing assessed?
9. Why wasn't the EA based on independently assessing higher potential activity levels that would obviously produce greater impacts?
10. Why didn't the FAA start with an EIS?

FAA sought to facilitate start up by minimizing mitigation and other costs to airlines: The airlines and the FAA understood that lower activity levels would result in lower impact assessments needed to support a FONSI. A FONSI would result in no mitigation actions resulting from the EA and thus no mitigation costs. The County would therefore not be able to use EA-identified mitigation costs as part of the negotiations in making the airport available on reasonable terms – terms the FAA itself stated could include direct

and indirect costs<sup>14</sup>. An artificially reduced scope was just another step in fulfilling start-up requirements of low cost airlines. In addition, the FAA is seeking ways to fund the terminal to take the cost pressure off the County and the airlines – lowering the barriers to entry and subsidizing the start up. Together these actions dramatically reduce direct/indirect costs thereby guaranteeing a lower cost negotiation between the County and the airlines – apparently, this is exactly what Ms. Suomi was seeking as evidenced by the following internal FAA communications:

**Joelle Briggs/ANM/FAA 02/04/2009 09:57 AM to Carol Suomi (copy to others in FAA)**

“... As you and I discussed, satisfactorily concluding negotiations does not mean that it must be a conclusion that has the airlines using Paine Field. It is possible for whatever reasons that the airlines decide during negotiations that this is not in their best interest.”

**Carol Suomi response to Joelle Briggs 02/04/2009 10:12 AM**

“Yes, Joelle, you are absolutely right, and I have had this conversation with the County. But, this is what the opposition is hoping, and would love for us to say (which is why I like not saying it). The opposition wants it to be so difficult and onerous that the airlines will give up.”

**Please respond:**

1. Why is the FAA assisting the airlines at Paine Field so aggressively that the FAA has engaged in coercion, conflicts of interest, manipulating federal subsidies, and irresponsibly minimizing the scope of the EA?
2. How does this internal conflict measure up to the objectivity expected and required by FAA policy, FAA orders and NEPA?
3. How could any reasonable person including elected officials, senior FAA or DOT officials or a judge not conclude that this process and predetermined outcome focus summarily fails the required objectivity litmus test?
4. What is the FAA’s plan to correct these issues?

Distorted market not acceptable as basis for the EA scope: Following a public hearing on the EA, the Paine Field airport director responded to calls to assess potential activity levels and impacts by stating that “market demand” will determine the level of activity. This approach does not address overall potential activity. Market demand cannot be part of the forecast and scope discussion without recognizing the influence of the distorted market that subsidies create. A subsidized market would increase activity levels including the diversion of market share from existing airports. The only way to truly account for foreseeable potential activity and meet the public protection requirements of NEPA is to assess the maximum capacity of the proposed federal actions.

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<sup>14</sup> December 2005 FAA ltr to SOC, enclosed

The EA timeframe should not be limited to five years: A short timeline of 2015 or 2016 was discussed in FAA communications with the only rationale being a reference to air quality conformity requirements for the State Implementation Plan (SIP). The SIP requirements do not dictate the length of an EA as confirmed by discussions with an air emissions regulatory authority. Furthermore, the FAA itself requires longer-term forecasts and master plan updates but when it comes to this EA, the FAA suddenly chose to discard those longer-term forecasts. The FAA has repeated that they are only following the law. However, no law requires this EA to set a record for the shortest timeline ever studied under NEPA for a federal action that in effect has the potential to change a region forever. On the contrary, NEPA requires an objective assessment of the impacts of a federal action.

The FAA instead determined this limited scoping design with input exclusively from Paine Field staff, the third-party contractor and the applicant airlines. Did they consider the public protection required in NEPA when providing input on the scope and forecasts? We do not see any documented evidence that the intent, spirit and compliance with NEPA were the basis of their input.

**Please respond:**

1. Why shouldn't an EIS be based on the maximum potential capacity of Paine Field after being certificated as a Class I airport?
2. Internal FAA communications regarding scope initially included assessment of the full capacity of the terminal(s), so why was the assessment criteria removed from the scope?
3. Why shouldn't a new EIS be based on a 20-year forecast? A 30-year forecast?
4. Why was this EA referenced to an air emissions conformity report with only a 5-year forecast?
5. What is the legal or rule based precedent requiring the EA scope to match timelines with an air emissions conformity report? If this was a project in 2014, would the timeline be matched to the SIP air emission conformity report of a scant one-year later?

This approach has produced an EA with a minimized and non-compliant scope that defies logic given the requirement to assess impacts of proposed federal actions. The FAA trick of looking at "foreseeable" activity levels where they define foreseeable is full of conflict of interest issues and avoids the requirement of assessing and mitigating potential impacts as required under NEPA.

FAA in Conflict: Minimal EA Scope incompatible with FAA Rules: If the FAA takes federal actions, including changing the Part 139 Operating Certificate of Paine Field to allow schedule service at Paine Field, then by FAA rules the airport may not constrain

additional flights from the initial air carriers or discriminate against other carriers that want in. On the one hand, the FAA wants to assess/mitigate the impacts of this role change on a relatively low level of activity while on the other hand their regulations require that the airport accept any and all activity literally 24/7. This reality demonstrates the conflict FAA has in promoting a minimal EA.

**Please respond:**

1. How does the FAA respond to this conflict?
2. Shouldn't the FAA address this conflict with a properly scoped EIS based on the maximum capacity of the airport? If not, why not?

The EA document is fatally flawed due to a minimal, inadequate and non-compliant scope. The EA is required because of planned federal actions. One of the federal actions is to change the Paine Field Operating Certificate from a Class IV to a Class I. Such a change opens the door to virtually unconstrained scheduled commercial service up to the safe capacity of the airport.

**Please respond:**

1. If the FAA allows for a "role change" for Paine Field then why not consider the impacts from "unconstrained activity" which FAA regulations require?
2. Why does FAA's Carol Suomi state that this is not a role change for the airport?
3. How is the use of short-term minimal activity levels as the scope of activity for the EA compatible within the purpose, spirit and intent of NEPA?

A minimal scope is duplicitous and seeks to avoid accountability and responsibility for the true potential impacts of federal actions. It adds insult to injury for the Airport and FAA staff to promote the low initial, estimated airline activity numbers from the applicants, knowing that FAA rules do not allow constraint of their activity levels once they start. The obvious incentive for the FAA, the airlines and the airport was to use the lowest numbers possible in order to ensure a FONSI by the FAA and thereby facilitate a quick low cost start up.

**Please respond:**

1. Please comment on the above referenced items. Shouldn't the FAA order an EIS based on full potential impacts?
2. Why is the FAA promoting an EA based on the airline applicant's activity levels, when the FAA knows those levels will easily be exceeded over a relatively short time?
3. Was there any effort to design the scope in this EA to create conclusions that have de minimus impacts?

The EA should be discarded and an EIS with a proper scope should be initiated: the new scope must be designed to account for all the potential activity levels and impacts of each of the following distinct federal actions:

- Part 139 Operating Certificate changing the role of the airport
- Allegiant operating certificate for aircraft and cities proposed
- Horizon operating certificate for aircraft and cities proposed
- FAA funding (or partial funding) of a terminal (they call it an expansion of the existing terminal)

### **EA Preparation and Scoping Was Not a Public Process**

FAA rules allow the agency to involve the public during the scoping process including government and non-government organizations.<sup>15</sup> In fact, FAA encourages and supports a public EA scoping process for situations like Paine Field<sup>16</sup> (emphasis added):

“Although scoping is not required for EAs, scoping could enhance EA preparation and content. This is especially so when the proposed action is highly controversial or involves special purpose laws or other environmental concerns....

**a. Conducting EA scoping.** ..... Instead, the airport sponsor should use the local media or mail to notify the public that it is planning to conduct scoping for an EA.”

#### **Please respond:**

1. Why didn't the FAA invite interested governmental and non-governmental agencies to participate in the scoping process for this EA?
2. Why didn't the FAA and County Airport share documents and rationale related to making scope decisions?

Doing so would have helped to ensure that all concerns were heard early in the process so they could have been accounted for in the scope and design of the study. The FAA actually has guidance promoting involvement of the affected community as follows<sup>17</sup> (emphasis added):

**EA PREPARATION COORDINATION.** Text at 40 CFR 1501.4(b) states:

“The [Federal] agency shall involve environmental agencies, applicants, and the public, to the extent practicable, in preparing assessments ...

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<sup>15</sup> See FAA Order 1501.7

<sup>16</sup> FAA ORDER 5050.4B Part 705 Dated April 2006

<sup>17</sup> FAA ORDER 5050.4B Part 704 Dated April 2006

**a. Public input.** EA preparers should coordinate with resource agencies, industry groups, and the affected community as practicable and necessary to ensure the EA addresses those issues of greatest public concern.”

The FAA and Paine Field staff chose instead to minimize community involvement and public process to implement a “de-minimus” path towards a FONSI – a path they apparently felt was defensible. This approach fails on several levels including a failure to comply with the intent, spirit and purpose of NEPA.

**Please respond:**

1. Why did the FAA disregard FAA Order 5050.4B with regard to involving the public in EA preparation?
2. How did the FAA conclude it could ensure the EA addressed those issues of greatest public concern without fully involving the public?

**Sole Source Consultant and a Conflict of Interest Violation – EA Invalidated**

The NEPA process requires a selection process that produces a truly independent, qualified consultant devoid of conflict of interest and free from bias related to past or future financial gain. However, the consultant, Barnard Dunkelberg & Company, was targeted for selection early on based on past performance at Paine Field as demonstrated in this e-mail from Paine Field staff to the FAA:

“I understand that a cat x is not an option and we need to get a consultant underway to develop an EA. We selected Barnard Dunkelberg in 2007 for a multiyear on call planning contract. ... I would like to give RYK a call today if possible to get him underway.”<sup>18</sup>

There is no documentation that a competitive bid process was used. Given the fact that this consultant was working with the FAA shortly after this communication, the only conclusion is that this was a sole source selection. Since Paine Field has used this consultant for no less than the last 15 years, it is reasonable to assume that future work may be more likely if the EA met expectations of the funding source (FAA) and the airport staff. The sole source hiring not only used taxpayer dollars but was also made at the expense of the public’s need for an independent, objective and unbiased analysis. In addition, after the hiring there was an all too cozy relationship between the consultant and the FAA as depicted in the following FOIA obtained email excerpt below:

Ryk Dunkelberg (Consultant) to Cayla Morgan (FAA) 3/11/2009

Top of the morning, sweet Cayla and a Happy Wednesday! Welcome back from vacation, hope all was well and you had a wonderful time. ....

As always, have a great and groovy day and call with questions!!

PS I DO have tickets to see Bruce Springsteen in three weeks!

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<sup>18</sup> Bill Dolan (Paine Field) to Cayla Morgan (FAA) 2/6/2009

**Please respond:**

1. Did the FAA and/or Snohomish County perform a competitive bidding process to identify the consultant? If so, please provide documentation that demonstrates a fair, objective process was used. If not, why not?
2. Why was the consultant chosen on a sole-source basis?
3. Please show how the procurement process for the EA's consultant followed the FAA's Acquisition Management Policy.<sup>19</sup>
4. Has the Responsible Official prepared a disclosure statement specifying that the contractor has no financial or other interest in the outcome of the project? (40 CFR 1506.5(c)), (FAA 1050.1E section 204b[1])
5. Why has the FAA and/or Snohomish County used the same consultant repeatedly for projects involving the airport over the past several years?
6. Doesn't this present a conflict of interest since the consultant has clearly lost their objectivity?

**FAA Uses Funding of EA to Demand County Terminal Resolution**

The FAA told the Airport Director they would not fund an EA unless the County agreed to build a terminal:

**Feb 9, 2009 Carol Suomi to Dave Waggoner:** "There will only be funding of an EA IF the County agrees to build a terminal...."

**Draft EA/Hearings Timing Demonstrates Low Regard for Public Input**

The FAA decision on the timing of the release the Draft EA over the holidays and scheduling hearings in the first two work evenings after the holiday reflects a disregard for public comment – a de-minimus approach to use a term from the EA. Under pressure, the FAA extended the comment period and scheduled a third hearing at a location closer to the airport. However, the scheduling decisions reflect another example of the mindset and approach prevalent throughout the process – one that has served to undermine the public trust. Furthermore, the FAA failed to ensure public involvement as described in the following FAA Order 1050.1E CHG1:

**"208. PUBLIC INVOLVEMENT**

**208a.** 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

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<sup>19</sup> See FAA Order 1050-1E section 204b

environmental impacts resulting from the proposed action and alternatives; and provide the public with this information and allow it to comment on these findings.”<sup>20</sup>

***Please respond:***

1. How does the FAA reconcile public involvement with the release of the EA just prior to the Christmas holiday season?
2. Why were EA hearings scheduled for the first two working days in the New Year? How does this represent good faith efforts to obtain public input?
3. Demonstrate how the EA process complied with public involvement policy and rules as set forth in FAA Order 1050.1E CHG 1, NEPA and CEQ?

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<sup>20</sup> FAA ORDER 1050.1E CHG 1 Section 208

## Part III Comments on impacts that the EA failed to address

We note some specific comments here on several issues. However, all environmental issues enumerated in the original EA must be reassessed in an EIS after a new scope is developed based on full impacts of the airport changing from a Class IV to a Class I airport, with two terminals at full capacity.

### **EA Assumptions and Methodologies not Transparent**

The Draft EA fails to provide full transparency regarding assumptions, scope and analysis in a number of areas.

#### **Please respond:**

1. What are the qualifications of the company producing the Draft Environmental Assessment (DEA)?
2. Will those qualifications and the standards and methodology they apply be made public?
3. In particular, where have the employed methodology and standards been previously applied and how successful were they in accurately predicting the environmental impacts that resulted?
4. Given the current lack of information about the EA's process, why shouldn't this EA be invalidated in favor of an EIS? If we cannot assess the assumptions and methodology, then we cannot assess the output. For this reason alone, the EA fails and an EIS should be done.

In addition, outside of construction activities, the various items assessed (traffic, schools, pollution, etc.) are all based on a scaled back number of flights. The EA therefore minimizes the overall impacts in virtually all areas.

#### **Please respond:**

1. Doesn't the public deserve, and doesn't NEPA demand, an assessment of the reasonable worst case associated with all the involved federal actions including changing the airport role to allow for scheduled service?
2. Based on the flaws identified in the EA, shouldn't an Environmental Impact Statement be conducted that properly addresses the full impacts, items that must be mitigated, and costs to mitigate?

### **Failure to Adequately Assess Alternatives as required by NEPA**

According to the EPA, "EPA's regulations implementing NEPA require evaluation of the no-action alternative, which provides the baseline for comparison of the action alternatives."

The "baseline" needs to be established as an environmental reference and comparisons made to future direct, indirect and cumulative effects from the proposed alternative. Our comments below show a general failure to assess or analyze a baseline properly for such items as air pollution, traffic, impact on children, etc.

Further, once a baseline has been properly established, the comparison to the "action alternatives" must be based on the full capacity of a two terminal airport, as stated repeatedly throughout this document.

Finally, an objective analysis would reveal that in many cases, the "no action alternative" would likely be the preferred alternative. The "no action alternative" would provide the least environmental impact on air pollution, land use compatibility, noise, children, etc.

#### **Please respond:**

1. Why hasn't more analysis and assessment been done to properly develop a baseline for air, ground, water, traffic and other environmental impacts?
2. Wouldn't the "no action" alternative be the more likely alternative if baseline comparisons were properly compared to the action alternatives, especially when compared against unconstrained flight activity with two-terminal capacity at Paine Field?
3. Why is purpose and need not defined? How can the consultant use undefined purpose and need as a basis for eliminating alternatives?

### **Environmental Consequences / Environmental Health and Safety Risks**

The EA fails to adequately or responsibly identify the known potential impacts. The EA's limited projection period of only five-years does not adequately address the known health risks associated with residing in close proximity to commercial airports. The 25 TPY of Carbon Monoxide (CO) that would put PAE above de minimis standards would require approximately a 25% increase in the estimate of total operations. Once the commercial certificate is issued, the commercial flights are likely to jump beyond the deceptively low estimate of 20 operations a day to a much higher number, as happened in Bellingham (BLI) for example. Additionally, the estimate that technology will become cleaner is also liberal. The GA flights, with leaded particulates, and the jet flights with

the even more hazardous addition of ultrafine particles, create a lethal combination for the air quality in the residential zones surrounding Paine Field.

In a 2009 article, 'Aircraft Emission Impacts in a Neighborhood Adjacent to a General Aviation Airport in Southern California',<sup>21</sup> University of California researchers discovered highly elevated ultrafine particle (UFP) concentrations downwind of the Santa Monica Airport (SMA). The author, Dr. Suzann Paulson, recently confirmed that we would expect to see an increased level of UFP's given commercial flights at Paine Field, considering that meteorological conditions would increase the accumulation and concentrations at ground levels due to the lower night and winter temperatures compared to southern California daytime temperatures and SMA nighttime flight restrictions. Additionally, the South Coast Air Quality Management District made measurements of PM<sub>2.5</sub>, total suspended particles (TSP), lead, and ultrafine particle concentrations in the areas around SMA, and nearby Van Nuys Airport. They found highly elevated total suspended particulate lead, by up to a factor of 25 immediately adjacent to the takeoff area and a factor of 7x higher than background in the residential area. They also observed spikes in ultrafine particle number concentrations associated with aircraft departures. A study of London Heathrow Airport<sup>22</sup>, reported aircraft NO<sub>x</sub> at least 2.6 km from the airport. VOC, NO<sub>x</sub>, CO, and CO<sub>2</sub> were measured around the Zurich Airport.

Surrounding Paine Field are five schools, a community park, an intensively used 4-field little league complex and a YMCA summer camp within 1 km of the airstrip. There are more than 15 schools within a 3 km radius. The FAA, Airport manager Dave Waggoner and the EA ignore the very serious and devastating impacts commercial flights at Paine Field will have on the community and the air quality at public and private schools and daycare facilities.

It is unconscionable to change the classification of Paine Field considering the fact that the surrounding communities were built on the assumption that Paine Field would continue to be an airport used for general aviation and the Boeing Company. Indeed, if the airport is expanded, we will have an ideal human case study on the epidemiological impacts on children raised within the vicinity of a commercial airport. The 37,000 + children who live in this community and attend elementary school, middle school, high school, day care and preschools deserve to breathe the cleanest air possible, not to be subjects of a misguided experiment in human health risks. To better understand the effects of air pollution on children's health, please see the studies published in *Pediatrics* (2004).

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<sup>21</sup> Shishan Hu, Scott Fruin, Kathleen Kozawa, Steve Mara, Arthur M. Winer and Suzanne E. Paulson, Aircraft Emission Impacts in a Neighborhood Adjacent to a General Aviation Airport in Southern California, *Environ. Sci. Technol.*, 2009, 43 (21), pp 8039–8045

<sup>22</sup> Schrmann, G.; Schfer, K.; Jahn, C.; Hoffmann, H.; Bauerfeind, M.; Fleuti, E.; Rappengluck., B. The impact of NO<sub>x</sub>, CO and VOC emissions on the air quality of Zurich airport *Atmos. Environ.* 2007, 41, 103–118

## Air Quality

There is insufficient data in the Draft EA to address total air emissions impacts due to the foreseeable potential activity levels associated with the federal actions being considered.

SOC requests studies similar to those published in May 2009, in Environmental Health by Zhou and Ley, "Between-airport heterogeneity in air toxics emissions associated with individual cancer risk thresholds and population risks." Their findings indicated that site characteristics can be used to accurately predict maximum individual risk and total population cancer risk at a given level of emissions. Including airports with the meteorological inversions characteristic to those observed in Paine Field may elucidate future work expanding the data collected at 32 airports across the US.<sup>23</sup>

### **Please respond:**

1. Why doesn't the EA include the option of the maximum activity levels to fully account for all air emissions?
2. Why did the EA skip over air toxins described by the Puget Sound Clean Air Agency?
3. There needs to be a rigorous analysis of PM 2.5 since the county is on the brink of falling out of attainment on this priority pollutant. Will a new EIS be done to include such rigorous analysis?
4. Why did the EA not include a rigorous assessment of CO2 emissions given EPA's recent announcement and pending rules and legislation at the state level?
5. How does the EA assess health impacts without an acceptable air emissions analysis to establish a baseline?
6. Given the foreseeable expansion of activity based on the proposed federal actions including the desired and expressed growth of the two applicant airlines how can an air emissions assessment be accepted for a few flights looking no more than five years out?
7. Why do other EA's and EIS's on major projects or proposals have to look out farther than five years? For example, a 2008 Mead & Hunt EA, conducted prior to the construction of an Air Traffic Control Tower for University Park Airport in State College, PA included a 20 year table that looked back 4 years (to 2004) and projected out to 2020. The Puget Sound Regional Council is finalizing a 2040

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<sup>23</sup> This study was sponsored by the Federal Aviation Administration (FAA) through the Partnership for Air Transportation Noise and Emissions Reduction (PARTNER) under Cooperative Agreement No. 03-C-NE-MIT- 026, Subcontract Agreement No. 5710002069.

- plan, the FAA produces 20 year forecasts, and NEPA compliance efforts around the country including airport projects provide precedent for comprehensive scopes based on potential impacts rather than minimal assessments.
8. What rules prevent looking out 20 years at the potential activity level of the proposed federal actions in order to comply with NEPA by identifying potential significant impacts and associated mitigation?
  9. How does the limited scope and timeline compare with other air emissions assessments of major proposed projects or federal actions requiring NEPA compliance?
  10. With an expanded scope, why would the FAA oppose a more thorough air National Ambient Air Quality Standards (NAAQS) assessment and EIS?

Based on this issue alone and pursuant to the requirements of FAA Order 1050-1E, an EIS should be conducted.

**Compatible Land Use: Significant Land Use Compatibility Issues exist**

Changing Paine Field from a Class IV to a Class I airport with full capacity creates significant land use compatibility issues for cities throughout south Snohomish County. Based on a deliberate plan for managed growth that started 33 years ago, Paine Field is essentially surrounded by residential communities on all sides.

**Background.** Cities voiced concern about the potential development of Paine Field in the 1970's when the federal government deregulated airline travel. Residents then had the same concerns as residents now—they didn't want to live next to a major airport. As a result of such concerns, Snohomish County brought in arbitrators with the community and crafted a Mediated Role Determination (MRD) agreement of 1977/78, copy enclosed. The MRD stated that the County would "strongly discourage" development of Paine Field for air passenger and air cargo use. It created a three-legged balanced approach: the County would support aerospace activities (i.e. Boeing and its suppliers), support the community with limited activity from Paine Field, and support general aviation activity at Paine Field. The MRD's adoption by Snohomish County induced residential development; cities changed their land-use planning to zone from light and heavy industrial to residential. Such residential development has taken place for the past 33 years up to today, practically up to the borders of Paine Field.

The MRD has been reviewed six times in the past thirty years. Each time, Snohomish County has reaffirmed it, as recently as 2007.<sup>24</sup> The panel had the following final conclusions:

“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.** (Emphasis added.)”

The MRD has been found to be a legally valid document despite relatively recent federal laws, such as the 1990 Airport Noise and Capacity Act that now restrict limitations on airline travel by local authorities.<sup>25</sup>

The MRD induced 33 years of residential development around Paine Field, specifically with the promise of minimal flight activity from Paine Field. Federal laws might preempt the contemplated restrictions on Paine Field, but they cannot reverse the fact that every foundation of every home in the area is based on the MRD’s promise of limited use of Paine Field. As a result, the proposed action under the EA creates significant land use compatibility issues with the residential communities.

Indeed, the communities of Brier, Edmonds, Lynnwood, Mountlake Terrace, Mukilteo and Woodway have recognized the compatibility issues. Each of these six cities’ councils has issued resolutions opposing airline activity at Paine Field. Their mayors have agreed. **(See enclosed letter.)** Further, those cities have memorialized such understanding into their Municipal Planning Policies (MPP’s) while Snohomish County has memorialized such an understanding into its County Planning Policies, as required under the State’s Growth Management Act.

**Growth Management Act creates significant land use compatibility issues.**

Under the Growth Management Act, counties are required to adopt Comprehensive Plans that guide development in the County. Snohomish County’s Comprehensive Plan

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<sup>24</sup> “Report on Mediated Role Determination for Paine Field,” Peter Camp, Executive Director, Office of Snohomish County Executive Aaron Reardon, May 16, 2007

<sup>25</sup> KKR Memorandum to Sno. Cty dtd 12 Oct 06

incorporates by reference the airport's "adopted role." In the Capital Facilities chapter of the Comprehensive Plan, two separate policies make this incorporation:

"The County shall plan for Capital Facilities that support the best use of the airport's remaining undeveloped and underutilized areas for airport-related uses **that fit within the airport's adopted role.**"

Capital Facilities Policy 7.A.1 (emphasis supplied).

"The County shall identify land acquisition priorities related to airport safety, future airport development, and land use compatibility **in accordance with the airport's adopted role.**"

Capital Facilities Policy 7.A.2 (emphasis supplied).

Explanatory text in the Comprehensive Plan that just precedes these policies makes clear that the "adopted role" refers to the role adopted in 1978. That explanatory text states, among other things, that "in 1973 the County initiated a planning study of the airport that generated significant public debate and eventually culminated in County adoption in 1978 of a general aviation role for Paine Field." The explanatory text discusses other plans that were adopted in 1981 and 1983 and then states that "[t]hese documents chartered a future for both the airport and the surrounding community that was predicated on a defined role for the airport that features continuation of Boeing's operations and expanding operations for general aviation." Thus, consistent with this text and the policies quoted above, the Comprehensive Plan's Capital Facilities Goal 7 states: "Develop investment strategies for Paine Field to support and enhance its role **as a general aviation** and industrial commercial facility consistent with the Airport Master Plan." (Emphasis supplied.)

The foregoing should establish that the MRD's General Aviation role for Paine Field has been incorporated by reference into the County's Comprehensive Plan.

In sum, while the MRD is not a legal "contract," the role it specifies for Paine Field has effectively been carried over into the County's Comprehensive Plan. The Comprehensive Plan clearly specifies that the role of Paine Field is to be for "general aviation." No reference is made to scheduled commercial operations.

In 1993, the Puget Sound Regional Council (PSRC) adopted Resolution A-93-03 amending the 1988 Interim Regional Airport System Plan (RASP). Resolution A-93-03 conditionally authorized construction of the third runway at Sea-Tac International Airport. That resolution also indicated that a "major supplemental airport should be located in the

four-county area within a reasonable travel time from significant markets in the region." The resolution also states, "**Eliminate small supplemental airports, including Paine Field, as a preferred alternative.**" Based on Resolution A-93-03 alone, we find continued incentives and inducements by municipalities to promote residential development in the areas immediately surrounding Paine Field and in those communities under the flight paths.

Therefore, the MRD in combination with PSRC's Resolution A-93-03 have created significant land use compatibility issues. These issues should be studied under an EIS with complete analysis as to the costs associated with substantial mitigation efforts that will be needed throughout the affected communities in south Snohomish County.

#### Countywide Planning Policies

The Growth Management Act requires Snohomish County and its cities to develop the CPPs and requires that Snohomish County's Comprehensive Plan (and the Comprehensive Plans of all the cities within Snohomish County) be consistent with the CPPs. RCW 36.70A.210(1). The CPPs are adopted by an amalgamation of Snohomish County and the cities within the Snohomish County. These various local government entities developed the document through the "Snohomish County Tomorrow" body.

The CPPs specifically address Paine Field and state that "land uses and zoning of Paine Field continue to be governed by the Snohomish County Airport Paine Field Master Plan and Snohomish County Zoning Code consistent with federal aviation policies and grant obligations." CPP Policy ED-3c. As discussed above, the Paine Field Master Plan arguably limits Paine Field to a "General Aviation" role.

#### Consistency with Comprehensive Plans of adjacent jurisdictions

Snohomish County's Comprehensive Plan must also be consistent with the Comprehensive Plans of adjacent jurisdictions. RCW 36.70A.100. Snohomish County cannot ignore the land use planning and development that has occurred in neighboring communities based on their good faith reliance on Snohomish County's earlier decision to limit Paine Field's role to General Aviation.

**Mukilteo's Comprehensive Plan calls for a significant amount of residential development in areas bordering Paine Field.** It also includes the following transportation policy: "The City of Mukilteo opposes physical and operational expansion of Paine Field General Aviation Airport to accommodate commercial aviation." TR 31. Also, "the City of Mukilteo shall actively participate in airport planning to decrease current noise levels, limit flight paths, limit evening and nighttime landings, and limit the number of incoming and outgoing aircraft at the Paine Field General Aviation Airport." TR 32.

Finally, as noted above, Snohomish County Executive Aaron Reardon formed an MRD Review panel in 2005. When it completed its work nearly 2 years later, the panel reaffirmed the MRD. The FAA (represented by Ms. Carol Suomi) participated in these panel meetings as an observer, and was well aware of the controversial aspect of the discussions.

Summary: Between the land use policies calling for significant residential development in areas surrounding Paine Field and these transportation policies that are directly on point, there is incontrovertible evidence that significant land use compatibility issues exist that must be addressed in an EIS and mitigated.

Conclusion: FAA Order requires full EIS

Pursuant to FAA Order 1050-1E:

**"202a.** The responsible FAA official should initially review whether the proposed action:

- (1)** Could significantly affect the quality of the human environment, for example, with respect to noise, land, air, water, wildlife, energy supply and natural resources, or cultural, historic or archeological resources;
- (2)** Would be located in wetlands, floodplains, coastal zones, prime or important farmlands, habitat of Federally listed endangered, threatened, or other protected species, wild and scenic river areas, areas protected under section 4(f) of the DOT Act, or in or adjacent to minority or low income populations; or
- (3)** Would be highly controversial on environmental grounds (40 CFR 1508.27(b)(4))."

The FAA knew, through its ongoing observations at the MRD review meetings in 2005-2006, of the significant effects of scheduled air service on the human environment and that this action would be highly controversial on environmental grounds.

**"201d.** If the EA indicates the proposed action's impacts would meet or exceed a significance threshold(s) for the affected resource(s), or that mitigation would not reduce the significant impact(s) below the applicable threshold(s), FAA must prepare an EIS."

**Please respond:**

1. Why did the consultant fail to address the MRD and subsequent 33 years of residential development surrounding Paine Field?
2. The scope of the EA fails to address the proposed new airline activity out of Paine Field. How would airline activity, based on Paine Field's full capacity as allowed under federal law, be compatible with the land use policies of Snohomish County and its surrounding cities over the past 33 years?
3. What impacts would this have?

4. How would such impacts be mitigated for the home-owners, schools, churches, hospitals and other related facilities that both surround Paine Field and are under the proposed flight paths of the airport at full capacity?
5. How does the FAA plan to pay for the substantial mitigation costs needed for the affected communities throughout Snohomish County?

### **Noise and Compatible Land Use**

The Draft EA does not include the maximum amount of flight activity and therefore fails to fully assess the noise impacts. Furthermore, the 65 DNL threshold has a number of flaws, as the FAA is well aware.

Noise is a huge concern and the FAA should be required to assess the maximum activity level associated with a change in the airport's role from a Class IV to a Class I airport with scheduled airline activity.

#### **Please respond:**

1. How would the 65 DNL noise contours change based on unconstrained maximum capacity at Paine Field?
2. How would they change based on frequent nighttime flights?
3. How would such noise be mitigated?
4. How will the FAA, the County or the airlines pay for such mitigation?

### **Socioeconomic Environment, Environmental Justice, and Children's Environmental Health and Safety Risks**

Studies show the impact on airports affect the learning environment. One significant study stated, "Our findings indicate that a chronic environmental stressor-aircraft noise could impair cognitive development in children, specifically reading comprehension. Schools exposed to high levels of aircraft noise are not healthy educational environments."<sup>26</sup>

Another study states, "The constant roar from jet aircraft can seriously affect the health and psychological well-being of children, according to a new Cornell University study. The health problems resulting from chronic airport noise, including higher blood

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<sup>26</sup> Aircraft and road traffic noise and children's cognition and health: a cross-national study", SA Stansfeld; B Berglund C Clark; I Llopex-Barrio, et al., The Lancet Jun 4-June 10, 2005; 365, 9475 Discovery pg 1942

pressure and boosted levels of stress hormones, the researchers say, may have lifelong effects. <sup>27</sup>

The limited scope of the draft EA underestimates the impacts to the socioeconomic environment. A proper scope, based on full capacity of Paine Field, is needed to conduct this analysis.

Social impacts to surrounding communities have not been adequately addressed and subsequently provide further proof that an EIS is warranted. Among these concerns, are airport impacts that will adversely affect those residing in close proximity to increased airport operations, such as residents in a nearby mental health facility, Snohomish County Evaluation/Treatment Facility on the Mukilteo Speedway. Residents there are most vulnerable and unable to relocate due to the nature of the facility. Moreover, the EA fails to consider impacts on local residents most vulnerable to noise and pollution - the elderly, immuno-suppressed persons with cardiovascular and pulmonary health issues who may not be physically able to relocate. While increases in social service costs are difficult to measure, sadly health risks are measurable such as increased hypertension, cardiovascular disease, cancer and leukemia.

Please respond:

1. How did the EA address these important impacts?
2. Why does the FAA find disregarding these impacts to be compliant with the intent, spirit and purpose of NEPA?

### **Impacts on Schools Must Include All Scheduled Service Activity Impacts**

The statement in the Draft EA that no residences or schools are within the project area indicates a thought process and approach that misses the point. This is not just about the construction of a terminal. The FAA, the County and Airport Officials and the airlines are well aware that the major concerns are about the activities associated with starting up and expanding scheduled service. Impact to schools, children, playgrounds, hospitals, residents and the communities at large are not restricted to the construction and existence of a terminal building since they are also exposed to the over-flights (flight paths) of inbound and outbound flights. Listing a technical school and one grade school in the entire Draft EA is absolutely inadequate and unacceptable. Impacts are not

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<sup>27</sup> Cornell University News Service (1998, March 6). Airport Noise Can Seriously Affect The Health And Psychological Well-Being Of Children. *ScienceDaily*. Retrieved March 29, 2009, from <http://www.sciencedaily.com/releases/1998/03/980306043455.htm>

restricted to the terminal construction or the day/night noise line that “averages” noise over a 24-hour period.

**Please respond:**

1. What are the impacts to schools from noise, pollution, and impacts to the learning environment, based on full operational capacity of the airport (with two terminals)?
2. Is the FAA aware of the number of schools near Paine Field and/or those schools likely impacted by over-flights (those in the flight path)? *See map, below.*

**Failure to comply with E.O. 13045 to assess all impacts to children**

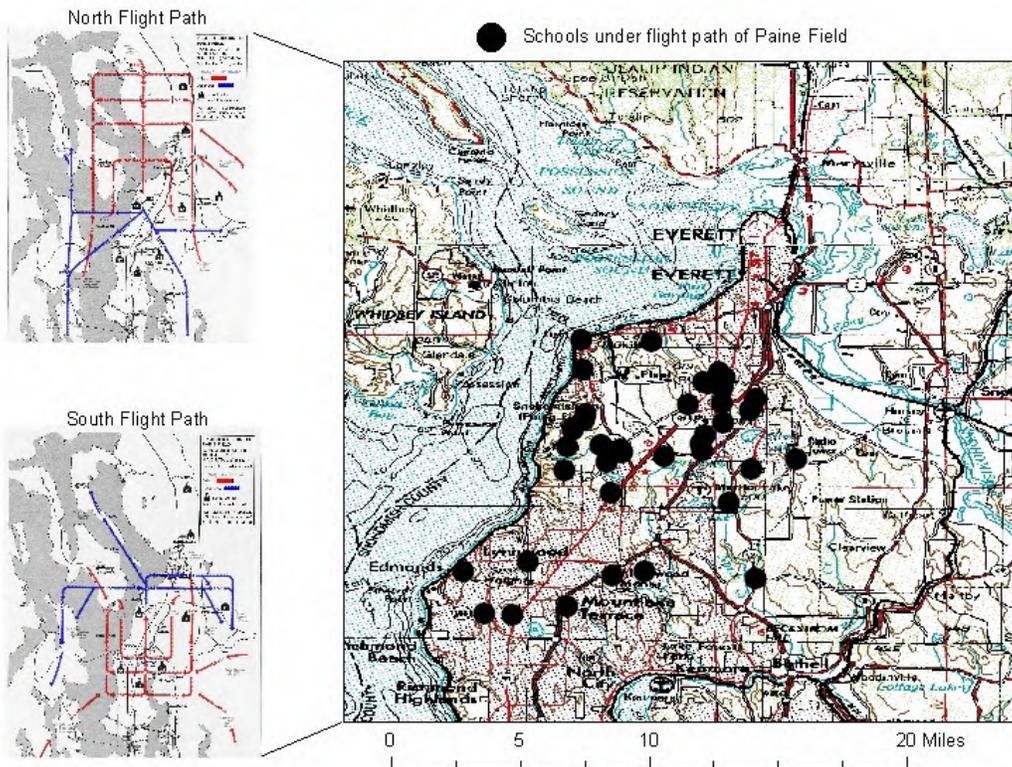
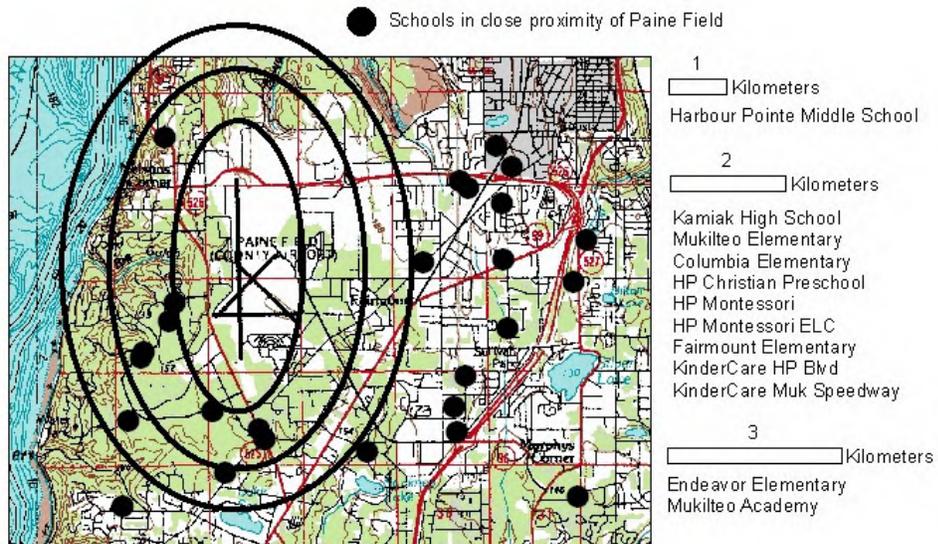
Requirements to fully consider all impacts to children alone should have driven a rigorous analysis of this issue and not of just a few flights but the maximum level.

**Please respond:**

1. Shouldn't a rigorous analysis based on a role change of the airport from Class IV to Class I at full capacity, include more than just noise but also air emissions, traffic, disruptions to learning, health impacts to children and so on?
2. Why isn't the Executive Order 13045 referenced in the Draft EA adhered to and not dismissed because schools are not in the “project area”? What about schools located under the flight paths, subject to noise, pollution and other environmental impacts due to the change of Paine Field from a Class IV to a Class I airport? Schools that are not in the project area are still subject to analysis, since the proposal includes a change in the role of an airport to a Class I status.

### SCHOOLS IMPACTED BY SCHEDULED SERVICE AT PAINE FIELD

There are more than 130 public and private schools in the flight path



### **Impacts on the Human Environment – Downward Spiral**

Lower property values lead to less tax revenue and less service and safety with more crime and downward spiral for impacted communities. The EA does not provide documentation for property value reduction. Conservative estimates suggest a low figure of 10% and in a 1997 professional analysis to the Orange County Board of Supervisors, Randall Bell, MAI, Certified General Real Estate Professional and Instructor for the Appraisal Institute indicated that homes with higher valuations experienced higher diminutions, up to 27% surrounding Orange County Airport.<sup>28</sup> These results translate to lower tax bases for county, cities, hospital and school districts and a downward spiral.

#### **Please respond:**

1. Why didn't the EA include an assessment of impacts on the entire human environment?

### **Surface Transportation**

The scope of the traffic analysis in the draft EA is extremely limited, estimating a maximum of 23 daily flights in the year 2016. However, Horizon and Allegiant will not be limited to the flights analyzed but rather by the capacity of the terminal(s), runway, aircraft and service routes. The draft EA suggests that no additional studies or mitigation will be required for these airlines to expand the services in their proposal. We note that although the EA uses Horizon's estimate of flight and passenger levels, the consultant could not agree with the Horizon estimate of passengers per car that would have reduced estimated car trips by 66%.

The traffic analysis in the EA as sent to Lorena Eng, WSDOT NW Regional administrator, presupposes that the maximum impact of allowing unlimited commercial air service by Horizon and Allegiant will only be 956 daily vehicle trips assuming 1.5 to 2.4 people per vehicle all based on a limited number of flights. Using these minimal volumes, of the 15 intersections Ms. Eng requested Snohomish County analyze, only 7 intersections realized 10 or more peak-hour trips. The other 8 did not receive more that 10 peak hour trips and thus were not analyzed. In addition, several critical intersections and interchanges that lead from I-5 to the airport such as I-5/I-405/SR 525 Swamp Creek Interchange, SR 525 and Lincoln Way, the SR 525 arterial were not studied because the analysis shows they would not receive more than 10 peak hour trips. These potentially significantly under-estimated volumes will also underestimate the severity of impacts to I-5, SR 525, the I-5 / 128<sup>th</sup> Street interchange and 128<sup>th</sup> Street (SR 96) from I-5 to Paine

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<sup>28</sup> 1994, Booz-Allen & Hamilton, *The Effect of Airport Noise on Housing Values: A Summary Report*

Field Airport and the SR 99/128<sup>th</sup> Street signal which already operates at Level of Service F (worst rating possible.)

Alaska/Horizon Airlines currently operates 60% of the departures from the Seattle-Tacoma International Airport. Although we believe there are many flaws with Paine Field's 2004 Mead & Hunt Report titled Passenger Core Market Analysis, airport officials and others refer to it as it provides one perspective regarding potential passenger activity levels at Paine Field as follows:

- “Snohomish County Airport/Paine Field catchment area contains approximately 28.6 percent (1,118,315) of the total population of the current Seattle-Tacoma International Airport catchment area (3,911,660). Accordingly, the Snohomish County Airport/Paine Field catchment area could garner a comparable share of the area's air travel market.” (p.19)
- “With retention of 30.0 percent of the Snohomish County Airport/Paine Field market, 1,512,463 origin and destination passengers would be generated annually.” (p. 21)

The analysis purports limited trips but the proposal, once accepted, requires a change in the operating certificate of Paine Field to allow unconstrained scheduled air service with no limitations on type of aircraft, number/frequency of flights or time of day. The traffic analysis and resultant impacts need to consider the full capacity of the airport and the market before making this irreversible change to the airport and region. A capacity analysis would reveal many millions of annual passengers depending on the assumptions used regarding aircraft, load factors and so on. Using the Mead & Hunt study's estimate of 1,512,463 origin and destination passengers described above, one finds vehicle trips several fold above those described in the EA. If this number of passengers was used even at above average carpooling standards with typical drop-off and pick-up trips we arrive at an estimated one million additional vehicle trips annually. That means 2,740 new daily vehicle trips or nearly 3X more than the 956 daily trips analyzed in the Environmental Assessment.

**Please respond:**

1. Please justify why the allowable impacts have not been analyzed.
2. Why was the consultant off in their traffic trip estimates by a factor of 3x?
3. If Horizon or Allegiant Air increases the number of operations proposed or increases the passenger capacity of the airplanes proposed, what areas of impact would require a new study? What specifically would trigger a new study? Please cite applicable law or regulations that support this idea.
4. The EA states that impacts were correlated with trips generated at Bellingham International Airport. Please provide a table showing the flights analyzed for the proposal to allow commercial air out of Bellingham and the

actual number of flights since commercial air service has started at Bellingham International Airport (BLI).

5. Gibson's Proposed Commercial Service at Paine Field Traffic Impact Analysis states: "The project may change some travel patterns in the Puget Sound region since it is anticipated that the project may divert some vehicle trips to Paine Field from Sea-Tac International Airport and Bellingham International Airport. This change in regional travel patterns could reduce the number of vehicles at the intersections and along the arterials analyzed in this report."<sup>29</sup> Please provide data showing the number supporting the above claim showing which intersections and arterials will see reduced vehicle volumes and the number of vehicles reduced. Also, explain which arterials and intersections the vehicles will be relocating to use.
6. The EA Traffic Analysis states, "Scoping discussions were held with staff at Snohomish County, The Washington State Department of Transportation, the City of Mukilteo, and the City of Everett." Please provide letters from Jim Bloodgood, Snohomish County Traffic Engineer, Lorena Eng WSDOT NW Region Administrator, Dong Ho Chang City of Everett Traffic Engineer, and Larry Waters City of Mukilteo Public Works Director stating that they have reviewed Gibson's traffic analysis and they concur that the project description, assumptions, and analysis accurately represent the traffic impacts that are likely to be seen by allowing unlimited commercial air service at Paine Field. Please review and provide comments that the mitigation fees proposed in the EA are sufficient to cover any and all roadway impacts as a result of Horizon and Allegiant being allowed unlimited commercial flights out of Paine Field Airport.
7. When planners analyze impacts to roadway systems, they use a 20-year horizon. Why was a 20-year horizon not utilized when completing this critical traffic analysis? This represents a significant flaw in the EA that requires a fullan EIS with at least a 20-year scoping period as discussed throughout this document.
8. Please provide the data from the Institute of Transportation Engineers reference that supports the assumption of 1.5 and 2.4 persons per vehicle used in this analysis.
9. What is the person per vehicle number used for arterials as typically applied by WSDOT?

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<sup>29</sup> Draft EA, Appendix F, "Proposed Commercial Service at Paine Field Traffic Impact Analysis", p. 1

10. Since commercial airport users will clearly be coming from the interchanges of I-5 and SR 526/SR 527 please explain why this interchange was not included in the traffic analysis?
11. Since commercial airport users will clearly be coming from I-5/ I-405 Swamp Creek Interchange please explain why this interchange was not included in the traffic analysis.
12. The intersection of SR 525 and Lincoln Way is known as a back up point. Explain why this intersection was not included in the traffic analysis.
13. Currently Snohomish County and WSDOT's SR 96 experience extreme back ups and delays on 128<sup>th</sup> Street (SR 96) between SR 99 and I-5. Please explain how these impacts will be addressed and mitigated, using a 20-year time frame.
14. The Traffic Analysis states that the intersection of SR 99 and 128<sup>th</sup> (SR 96) will be at Level Of Service ("LOS") F in 2016 with or without the project. (LOS F is the worst possible LOS.) The City of Everett has identified that capacity improvements for single-occupancy vehicles to the intersection of SR 99 are not practical due to the existing lane configuration and lack of right-of-way. If this intersection is operating at LOS F how will drivers get to Paine Field Airport if this is one of the main access routes? Please list what roadways and intersections drivers will divert to in efforts to avoid this LOS F intersection.
15. The estimate of 956 vehicle trips per day based on 23 airplane operations per day does not properly assess the impact to roadways since the airlines will not be limited to 23 operations per day. Please include an assessment of the available runway capacity for commercial operations and analyze the maximum roadway impacts that would be seen.
16. The traffic analysis did not assess impacts to the arterial SR 525. Please assess the impacts to SR 525 from the Mukilteo Ferry terminal to I-5 with the assumption as allowed by this project that commercial air service is only limited by the market and runway capacity.
17. The traffic analysis did not assess the impacts during peak summer travel periods. The Washington State Ferry Service operates the largest number of ferry commuters in the State at the Mukilteo terminal. Please analyze the peak summer ferry volumes with anticipated peak summer commercial air service market capacity and determine its affects on the I-5, SR 525, SR 526 and 128<sup>th</sup> Street (SR 96) arterials and their associated intersections and interchanges.

**P192**

18. The traffic analysis in the EA as sent to Lorena Eng, WSDOT NW Regional Administrator, analyses the maximum impact of allowing unlimited commercial air service by Horizon and Allegiant as being 956 daily vehicle trips assuming from 1.5 to 2.4 people per vehicle. With these minimal volumes, out of the 15 intersections Ms. Eng requested Snohomish County analyze only 7 realized 10 or more peak-hour trips. The other 8 did not receive more than 10 peak hour trips and were not analyzed. In addition, several critical intersections and interchanges that lead from I-5 to the airport such as I-5/I405/SR 525 Swamp Creek Interchange, SR 525 and Lincoln Way, the SR 525 arterial was not analysed because the analysis shows it will not receive more than 10 peak hour trips. These under-estimated impacts will have severe impacts to I-5, SR 525, the I-5 / 128<sup>th</sup> Street interchange and 128<sup>th</sup> Street (SR 96) from I-5 to Paine Field Airport and the SR 99/128<sup>th</sup> Street signal, which is already operating at Level Of Service F. If the analysis included over half a million trips as supported by the Paine Field 2004 Mead & Hunter report titled "Passenger Core market Analysis" what would be the impact to the 15 intersection analysis requested by WSDOT's NW Regional Administrator Lorena Eng?
19. The intersection of SR 526 and Everett Mall Way is not considered in the traffic analysis. Since this is the first intersection from I-5 to the airport from the North this should have been assessed. Please provide the currently LOS at this intersection during the PM peak.
20. The analysis states, "The project will, however, add trips to three intersections that are anticipated to operate at deficient levels of service, whether or not the proposed project is implemented. These intersections are SR 99 at Airport Road and the I-5 southbound and northbound ramps at 128<sup>th</sup> Street SW (SR 96). The traffic report only analyzes the southbound on ramp to I-5 at 128<sup>th</sup> but does not detail any analysis of the I-5 northbound ramps at 128<sup>th</sup> Street SW. Please add this analysis to the report based on full capacity at Paine Field.
21. If the carriers are not limited to the flights proposed, why are the FAA, Snohomish County, WSDOT, and Everett not demanding mitigation fees for the fully allowable impacts?
22. The traffic report states that, "Based on the trip generation and identified codes the total traffic mitigation fees identified in this report for payment to Snohomish County, WSDOT and the City of Mukilteo for the project is \$333,262. The Snohomish County mitigation fees are \$206,161.40, the WSDOT mitigation fees are \$32,695.20 and the City of Mukilteo mitigation

fees are \$94,406.25." Please provide letters from the agency officials stating that they concur with the above mitigation fee for the resultant impact.

23. Please provide comments from the City of Everett traffic engineer stating he agrees with the assessment that Everett will expect no traffic mitigation fees for the impact of commercial air service at Paine Field.
24. The traffic analysis assumption that 2% of the people flying on the commercial airlines will be arriving by bicycle allows Horizon and Allegiant to reduce their mitigation fees by 5%. Please provide your data source for the assumption that 2% of the commercial air travelers arrive by bicycle.
25. Please detail the back up for the assumption that only 34 employees will be needed to support commercial air service at Paine Field.
26. Please provide the compounded annual growth rate, the 5-year growth rate, the lane saturation volume and the flow rate used in this analysis.
27. Airport users will likely travel on Beverly Park Edmonds road west of SR 525. What volume of additional vehicles added by potential commercial air service would require arterial or intersection improvements on this section of Beverly Park road?
28. Page 12 of the traffic analysis states, "ITE's data shows that there would be 6.9 peak-hour trips per light." This is low for planes that carry from 76 to 150 passengers. Please explain.
29. Page 13 of the traffic analysis states "48 % of the trips will come from Beverly Park Road, SR 99, SR 525 and I-5, SR 527 and 35<sup>th</sup> Ave SE." Please analyze the route from these facilities to the airport. Please provide analysis from I-5 to SR 525 through Swamp Creek interchange, SR 99 and Lincoln Way. Please provide analysis of the SR 527/ SR 526/I-5 interchange. This should be done as part of an EIS.
30. Please propose a solution to the LOS F intersection at SR 99 and Airport Road since it will be an impact to Boeing commuters, Boeing suppliers, airport users, local residents and local businesses.
31. Page 47 of the traffic analysis states, " The intersection of SR 525 and Beverly Park Road is programmed to be improved to allow the existing second southbound left-turn and second westbound left-turn lanes to be opened up to traffic." It states that these, not currently completed improvements, have been assumed to be completed in the airport traffic analysis. Please comment on the anticipated impacts to traffic and SR 525 as a result of SR

525 southbound to northbound u-turn movement will be eliminated by the opening of the second left turn lane.

32. Why are the growth rates used for the traffic study inconsistent? Page 16 states that a 2% annually compounded growth rate was used for 2010 turning movements. Page 18 states that where pipeline data was not available, .5% annually compounding growth rate was used along 84<sup>th</sup> street. What is the annual growth rate for the ferry traffic using 84<sup>th</sup> Street? The report also uses growth rates of .53%, .93%, and 1.78%. Please explain these inconsistencies. How does this correlate with the anticipated growth rate of commercial air service at Paine Field over the next 20 years? Note again that Allegiant's prospective growth rate of flights is 500% in the next 5 years.
33. What is the number of passengers that are reasonably expected to fly out of Paine Field over the next 20 years based on the latest market studies?
34. Does the Airport Master Plan estimate additional trip generators in future years based on its master plan expansion? What are the numbers of trips anticipated each year through 2020?
35. How have the effects of reduced vehicle speeds and increased idling time been accounted for in the noise and air impacts? Has there been an analysis to evaluate the need for noise walls based on increased vehicle volume and the potential need for future roadway improvements?
36. The EA states that trips will be generated from drivers on SR 99. Please evaluate the potential impacts of commercial airport trips at the intersection of SR 99 and 148<sup>th</sup>.
37. Please provide the date for the installation of the signal at the intersection of Center Road and Beverly Park Road, which was assumed as operational for this analysis.
38. Has the full traffic volumes generated at build-out from Korry Manufacturing been included in the commercial airport traffic analysis?
39. Table 9 has not included the analysis of the 128<sup>th</sup> Street SW at I-5 Northbound ramps as it purports in the executive summary. Please provide this analysis.
40. The analysis of intersection #4 Beverly Park Road and SR 525 presents a maximum peak hour increase of 4 through vehicles and 9 turning vehicles. The analysis states that the project will generate 212 vehicle trips and 40% of

these trips will take Beverly Park Road. Please explain why the intersection analysis does not show 40% of the peak hour vehicle trips.

41. We are requesting the WSDOT perform an independent traffic analysis to assess the impacts of commercial air service at Paine Field. The analysis bears review as the increase in overall traffic volumes at the intersection of SR 525 and Beverly Park Edmonds Road from 2010 without the project to 2016 with the project only increases turn movements by 1 to 81 and through movements by 18 to 110.
42. On page 41 of the traffic analysis it states that arterial flow rates will be 10.3 mph in 2016 with project conditions. What will the travel time be from I-5? What will the travel time be from 128<sup>th</sup> Street interchange to Paine Field Airport during the PM peak in 2016 with the project? Also, what will be the reverse travel time from the airport to I-5 during this same time period? Has the increased car volume and idling time been accounted for in the noise and air study?
43. STAYBRIDGE Suites in Mukilteo at the intersection of SR 525 and Paine Field Blvd paid the WSDOT \$140,000 in roadway mitigation fees. Please explain how a hotel can be required to pay this amount with commercial airport expansion generating only \$32,000 in mitigation fees to WSDOT.
44. Please list the High Accident Location intersections on SR 525, SR 99, SR 96 and Beverly Park Edmonds Road that are included in the 2007 WSDOT publication. Please discuss what level of traffic volume increases would require improvements at these locations.
45. The forecast reports in Appendix G shows aviation growth rates at Paine Field from the 23 daily operations proposed to be a 7.3 % increase in 2010 with a 9.9% increase in 2016. If commercial growth rates are 9.0% how can roadway growth rates be 0.5%?
46. If the airlines have the ability to increase flights and airplane size at any time, how will mitigation for the increase be analyzed and paid?
47. Appendix I contains the Proposed Commercial Service at Paine Field Vehicles Miles Traveled Analysis. Page 4 states that the catchment area has a radius of approximately 30 miles. The traffic analysis in Appendix F is flawed in that it does not analyze the impacts to the catchment area. Please explain why traffic impacts to the catchment area were not analyzed.
48. The Central Puget Sound Region Designated Maintenance Areas are included in Appendix I. Please comment on how air quality due to increased traffic

volumes and increase airplane volumes impact the Catchment area as defined in the Mead & Hunt Passenger Core Market Analysis.

### **Parking**

Once again, the analysis failed to include the maximum activity levels instead relying on Horizon and Allegiant Airlines estimates regarding the number of flights and Snohomish County Airport (PAE), the applicant, to provide the parking space counts. Even the consultant disagreed with Horizon's estimate of passengers per car that would have reduced estimated parking demand by some 66 percent. The DEA states "Based on 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."<sup>30</sup> It is not the size of a building but the type of business that drives the need for parking. PAE has less than 300 parking spaces adjacent to the proposed terminal. Using the data from the DEA, assuming between 1.5 – 2.4 passengers/vehicle<sup>31</sup> there would be a daily need for between 187 – 299 parking spaces, not including the 34 new employees<sup>32</sup>. It is not difficult to assert that many of these vehicles would be consuming a space for a couple of days. Consider that constriction within the context that the average daily trips to-and-from the airport could be understated by a factor of 3X<sup>33</sup> and you will quickly conclude that available parking is not "sufficient" and that the FAA failed to assess the impacts from this obvious deficiency.

### **Cumulative Impacts**

The EPA defines "Cumulative Impacts" as follows:

**"Cumulative Impacts** - The impact on the environment that 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 actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over time. See 40 C.F.R. § 1508.7."

Requirements to assess cumulative impacts have not been met. The flawed minimal scope significantly understates the impacts associated with the contemplated federal actions. Cumulative impacts are to be based on reasonably assessing the cumulative impacts of potential and foreseeable actions. The 5-year outlook is not reasonable. Furthermore, it defies credibility to completely dismiss the potential for other airlines coming in once the door is open.

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<sup>30</sup> Draft EA page B.7

<sup>31</sup> Draft EA Table 4: Total Daily Trip Generation Summary at 2016 Full Operations, Appendix F page 11

<sup>32</sup> Ibid

<sup>33</sup> Paine Field 2004 Mead & Hunt Report, Passenger Core Market Analysis, pages 19 & 21

All potential and reasonably foreseeable actions need to be considered when assessing the cumulative impacts. This requirement forces FAA to look beyond the Horizon and Allegiant forecasts of a few flights a day and instead look at the expected and potential growth that is possible. If the FAA, low cost airlines and Paine Field are successful in obtaining significant taxpayer subsidies and in avoiding the legal and public pressures associated with this process then it is completely reasonable to assume that the cost of doing business at Paine Field will be cheaper than alternate airports including SeaTac. That means it is also reasonable to assume that some level of flight demand will shift to Paine Field. Further, it is reasonable to assume that some airlines will move to protect their turf and will demand the same “deal” the first airlines received.

It is therefore reasonably foreseeable to envision the last remaining constraint, other than Boeing complaining, to be the safe capacity of the airport. This will then be the final “cumulative impact” level. Since this final cumulative impact level is tied to the federal actions being assessed in this EA, it is both prudent and reasonable for the public to demand and for NEPA to require the honesty and transparency of a fully comprehensive cumulative impact assessment. This EA has not provided that. A legitimately scoped EIS can provide that and thus we demand a comprehensive EIS with full public involvement.

**Please respond:**

1. Why are the above cumulative impacts not considered?
2. Does the 5-year timeline limit the cumulative impact assessment? What would cumulative impacts look like over a more reasonable timeframe, such as 20 years? 30 years?
3. Please provide the citation, documentation, rationale and precedence for defining potential, reasonable and foreseeable as they relate to NEPA scope requirements.

## SOC's Overall Conclusions

First, the FAA engaged in coercion of Snohomish County to sway a vote by the County Council in favor of terminal construction. The FAA pre-empted its own rules and, by forcing that vote, created the basis to start the EA. Although internal FAA communications demonstrate restraint and a commitment to a more fair process by most, there are others in the FAA seemingly committed to getting airlines into Paine Field no matter what the cost to the public.

We recommend an independent agency, such as the GAO, immediately initiate an investigation immediately into the overall process and conduct of all involved officials at the FAA or Paine Field airport to determine compliance with applicable rules, policies and existing laws.

The FAA's overzealous drive includes the failure to hire a truly independent third-party contractor and the failure to direct that contractor to pursue a fair, unbiased and comprehensive analysis that genuinely meets the intent and purpose of NEPA. We ask that a new, qualified contractor be identified based on a proper bidding process.

In view of these findings, the EA should be negated in favor of a properly scoped Environmental Impact Statement. The County Council's vote was coerced, so the entire process leading up to such coercion should be reviewed with the Council having the opportunity to reconsider its vote.

We are copying the Snohomish County Council and County Executive on this letter. As stated in our letter of January 15, 2010 to the County, we urge the County to rescind its request for FAA terminal construction funds that effectively subsidize Horizon and Allegiant. The County's position of discouraging commercial service within FAA's legal requirements includes the County's stated policy to "insist that an airline pay its own way and mitigate its impacts." (MRD Report May 16, 2007.)

In support of the County's freedom to act without coercion, we specifically request that the FAA demonstrate clearly to the County that discretionary funds are, in fact, not jeopardized by any action that the County takes, or does not take, with respect to funding a terminal, and that the County fully complies with FAA rules whether or not the County chooses to subsidize terminal construction. The FAA must take whatever other steps necessary to reverse the poisonous atmosphere it created by its coercive actions.

Secondly, we believe the EA is fatally flawed based on its scope. We ask that if actions proceed to change Paine Field from a Class IV to a Class I airport that an EIS be conducted with a scope based on full capacity of the airport and full impacts and mitigation accounted for. The FAA rules on economic non-discrimination do not allow for local restrictions other than those that are safety related. That means no restrictions

on the number, frequency or time of day. The potential activity levels associated with changing the role of the airport are akin to looking at the maximum activity of a new commercial airport or new runway at SeaTac. The limited scope of the draft EA based on airline intentions hardly gets at this larger picture. Sea-Tac's 3<sup>rd</sup> runway analysis was not based on a few daily flights so it is reasonable to expect opening another "new" scheduled service runway/airport in the region would get no less of an analysis.

We specifically request the following:

1. The FAA should immediately order a new Environmental Impact Statement with the inclusion of both new terminals and their REAL maximum capacity.
2. The FAA should conduct the scoping process properly, inviting all governmental and non-governmental interested parties.
3. The impacts of two large terminals in operation 24 hours a day seven days a week must be studied.
4. Since the draft EA failed to properly scope out the impacts of changing the airport role and operating certificate to allow scheduled service, we ask that the "No Action Alternative" be the default alternative until a comprehensive full-capacity EIS is completed and compared to alternatives.
5. We urge the FAA to reject a flawed minimal assessment that concludes there are no significant impacts in changing the role of Paine Field. The system should not allow incremental "approvals" that, by design, circumvent requirements to mitigate impacts beyond certain thresholds.
6. We request an EIS with a scope that extends out at least 20 years, and preferably, 30 years. The draft EA only looks out to 2016 further minimizing the downstream impact analysis. This limited scope skews the entire assessment including but not limited to impacts from air emissions, noise, traffic, parking, water runoff and impacts to children required by Presidential Executive Order.
7. We request an EIS be conducted with a scope that addresses foreseeable potential activity levels resulting from a change in the airport operating certificate to allow commercial service. The public and our region deserve a fair, transparent and honest decision making process, particularly when the decision involves an irreversible regional game changer.

Finally, we provided comments outlining a number of substantial environmental concerns that the draft EA failed to address adequately due to the modest scope and/or flawed assessment methodology. We would expect that an EIS would address these substantial environmental concerns by outlining a plan to analyze, mitigate, and assess payment for them to the airlines at Paine Field. A failure to do this represents an

**P192**

unacceptable social, economic, and environmental liability to the taxpayers and municipalities of Snohomish County.

**Enclosures**

1. FAA letter to SOC dtd Dec 12, 2005
2. Letter from Congressman Jay Inslee to Ms. Carol Suomi
3. Mediated Role Determination, 1978/79
4. Letter from 6 Mayors to County Executive

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## Response to Comment

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Dear Save Our Communities:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### General Responses

- 1-1: Adequacy and Use of FAA Guidance
- 1-2: Scope of the Supplemental EA Analysis for Future Operations and Passengers
- 1-3: Flawed/Inadequate Supplemental EA
- 1-4: Adequacy of Public Involvement and Public Hearing
- 1-5: Additional Study Should Be Conducted
- 1-7: Study Areas
- 2-2: Mediated Role Determination (MRD) Document
- 3-2: Use of the DNL Metric
- 3-3: Noise Measurements and Supplemental Metrics Requested
- 3-4: Noise Analysis Methodology
- 3-5: Where are Flight Tracks Shown?
- 3-6: What Are the Existing and Future Noise Impacts?
- 4-1: Sources of Existing Air Pollution
- 4-2: Air Quality
- 5-1: Existing and Future Traffic
- 5-2: Traffic Analysis
- 6-1: What are the Quality of Life Impacts?
- 6-2: What is the Impact on Property Values?
- 6-4: What are the Health Effects Associated with the Proposed Action?
- 6-7: Effect on Culture of Local Community
- 6-8: Cumulative Impacts
- 6-9: Water Quality Impacts
- 6-11: Mitigation

Please also see the following individual responses.

### Socioeconomic Impacts

Section 5.12 of the Supplemental EA addresses the current socioeconomic environment. Section 6.12 addresses socioeconomic impacts and states that no residential or businesses would be relocated to accommodate the Proposed Action and no substantial impacts would occur in proximity to existing residences or businesses.

## **Air Quality Monitoring Stations**

Air quality status is established through interpolation between existing monitoring stations. The existing network of air quality monitoring stations has been deemed to be adequate by the USEPA and Puget Sound Clean Air Agency. Negligible increases in operational emissions are calculated in Section 6.2 of the Supplemental EA, which are anticipated to be largely offset by continued advances in aircraft technology. Additionally, a major factor in the area's favorable air quality is that the topography, climate, and meteorology of Paine Field allows for generally rapid dispersion and deposition of pollutants due to relatively windy conditions and among the highest frequencies of precipitation in the US. Thus, it is not anticipated that there will be effects to onsite or local air quality, and likewise that the installation of local air monitoring stations would not be necessary.

## **Air Quality Results**

Your comment noted a discrepancy between Table 6.4-1 and 6.3-2; however, there is no Table 6.3-2 in the Supplemental EA. The Study Team found a typographical error in one of the Air Quality tables and will review all tables prior to finalizing the Supplemental EA.

## **Fine Particle Contamination**

While the evaluation of fine aircraft particulate emissions, on surrounding residential areas, is not specifically addressed as part of the NEPA EA process; it should be noted that areas in close proximity to airports do not generally have higher concentrations of hazardous air pollutants than is found in typical urban environments. Because of the small size of the particulate, emissions deposition tend to occur well away from the flight path as atmospheric forces such as wind and pressure disperse particulate away from the original aircraft emissions source.

## **Flight Times**

Flight information is proprietary in nature. The airlines have provided generalized flight information, which enabled the Study Team to model day/night (noise) and peak hour scenarios (traffic). The volumes shown in the Traffic Impact Analysis are the peak-hour for each intersection, which results in an analysis of the worst case operations at intersections.

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**From:** Suzanne Martin <jeffreyandsuzannem@gmail.com>  
**Sent:** Friday, November 2, 2018 8:04 PM  
**To:** Paine Field <paine@esassoc.com>  
**Subject:** Airport comments

Hello,

Today I received a message via Nextdoor.com that today was the LAST day to submit written comments regarding commercial service at Paine Field. I have several questions.

1, Why, as an eleven year resident of Wingate, just a few minutes from Paine Field, did I JUST TODAY hear about ANY hearing, let alone that there was only one? And why did I NEVER hear about the Environmental Assessment that was done, and in a rather abbreviated manner as I understand it? Do not the residents in the areas that will be most affected by this dramatic change deserve something as simple as a bulk mail campaign? Or even a flyer under the corner of our doormat? It is incredible to me that leaders of this project which will have such a dramatic impact on the quality of life around here didn't think residents deserved a true effort to inform them of opportunities to comment.

2. Why was the Environmental Assessment a streamlined one? Why did we not deserve to have a comprehensive Environmental Assessment study done? Why did residents not have input on the scope of the study?

3 What criteria defines what a significant impact is? I've already been awakened before 5am by large commercial jets flying over my home and had my headboard rattle against the wall on another occasion. Is this not significant? Just yesterday I was on a run with my dog, had my music on my armband turned up to 10 when a large commercial jet flew VERY low and VERY loud over our heads. It was so loud I could not even hear that I had music on and my dog was freaking out! Again, what criteria are you going to use to define what constitutes a significant impact?

4. Why was the impact on property values not covered in the study? We put our house on the market this summer for two main reasons. One of them was the noise of airplanes that we knew was just going to increase, and the fallout that we would face if we didn't sell now. Referring back to Question 3, what criteria are you using to decide what constitutes significant impact?

5. Did you study the impact that additional car traffic related to commercial air service would have on the traffic from the Boeing plant to I-5? Have you ever tried to get from Mukilteo to I-5 at shift change time? How are the project leaders going to fix the nightmare that will be created by additional traffic?

There are so many questions I could ask. But the one that really shouts for an answer is, why wasn't there a real and true effort to let all residents know of meetings, studies, town halls, etc. early on in this process and until now? For in all likelihood, the planes are coming and its too late to change that now. But perhaps that was the goal all along.

Thank you in advance for your well thought out and complete response.

Suzanne Martin  
Edmonds, WA

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## Response to Comment

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Dear Suzanne Martin:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### **General Responses**

- 1-1: Adequacy and Use of FAA Guidance
  - 1-2: Scope of the Supplemental EA Analysis for Future Operations and Passengers
  - 1-3: Flawed/Inadequate Supplemental EA
  - 1-4: Adequacy of Public Involvement and Public Hearing
  - 1-5: Additional Study Should be Conducted
  - 1-8: Significance of Project Impacts
  - 1-9: How Is Significance Defined?
  - 5-1: Existing and Future Traffic
  - 5-2: Traffic Analysis
  - 6-2: What is the Impact on Property Values?
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**From:** dave@vanhorn.com <dave@vanhorn.com>  
**Sent:** Friday, November 2, 2018 8:19 PM  
**To:** Paine Field <painefield@esassoc.com>  
**Subject:** Comment for Paine Field

At Monday's open house, I was surprised to find that airlines are planning flights into Paine Field even when the tower is closed. I have concerns about the safety and environmental impact of this. In my experience, many airline pilots very rarely fly into non-towered airports and the skills to safely mix with traffic there are not taught in their regular retraining.

While the tower is closed at Paine, I have heard airline pilots announce, "Any traffic please advise", despite the FAA stating for many years that:

Pilots stating **traffic** in the area, "**please advise**" is not a recognized self-announce position and/or intention phrase and should not be used under **any** condition - The **Aeronautical Information Manual** section 4-1-9(g)(1)

That airline pilots do not know this, or chose to ignore it, testifies to their inadequate training for the un-towered environment.

I have also heard airline pilots on frequency tell pilots in smaller planes ahead of them on final approach that they should break off their landing and clear the area to allow the airliner behind them to land without delay. This conflicts with the right of way rules of 14 CFR 91.113, which state that the airplane ahead of them, closer to the runway on final approach, has the right of way.

Airline pilots have defended both of these actions, in conflict with FAA regulations and guidance, as consistent with their airline ops specs, indicating that their ops specs over-ride 14 CFR 91.113 both for themselves and for other airplanes already in the pattern at a non-towered airport.

In light of this demonstrated inadequate training for the non-towered environment, to prevent the environmental impact either of un-necessary go-arounds or a collision, I suggest that either

- a) Airlines be limited to operations only when the tower is open or
- b) Airline ops specs be amended to require any crews operating into Paine when the tower is closed receive annual training on the requirements of 14 CFR 91.113 and how to fit into existing traffic patterns without ATC assistance.

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## Response to Comment

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Dear Dave:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general response that applies to your comments.

### **General Response**

6-6: What are the Safety Impacts due to the Air Traffic Control Tower Hours?

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From: S Souza <ss14344@hotmail.com>  
Sent: Friday, November 2, 2018 8:36 PM  
To: Paine Field <painefield@esassoc.com>  
Subject: Noise Concern

Good evening,

My only concern regarding the commercial flights at Paine Field is the noise. I live on 52nd and 160th and have noticed that I hear more airplane engine at all hours.

Are we going to be given assistance for window installation? A friend of mine who lives in Seatac have two windows installed on every window and this helps tremendously with the noise.

Of course I'm also concerned about how the noise are going to affect wildlife. Will there be classes provides to us so that we can learn how to help wildlife, ex. planting trees and bishes in our yards, etc.

Thank you,  
Suzanne Souza

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## Response to Comment

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Dear Suzanne Souza:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### **General Responses**

3-6: What Are the Existing and Future Noise Impacts?

6-5: What is the Impact on Wildlife?

6-11: Mitigation

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Jerry D. Vergeront  
2125 W. Mukilteo Blvd.  
Everett, WA  
98203

Environmental Science Associates  
Paine Field Supplemental EA  
5309 Shilshole Ave NW, Suite 200  
Seattle, WA 98107

October 31, 2018

To the comment responders,

I have reviewed the full 2012 Environmental Assessment, as well as the draft assessment. I need to first comment that EA is both woefully under-scoped and it appears to have been a bias assessment specifically designed to produce a preferential assessment of the applicant's project (through a series of limited reviews, incorrect data used for reviews, and the purposeful omission of both data and process).

That being said, instead of general comments, I have a series of direct questions that point out deficiencies in the work. I expect to receive a formal response to my questions as part of mandatory review.

1. The final scope of the engagement appears to be so limited in scope as to not address all community impacts.
  - a. Who, specifically, determined the scope of the assessment?
    - i. Please note, I am looking for actual names of representatives, not a generic statement of "teams" from the airlines, Paine Filed, and ESA.
  - b. How, exactly, was the scope determined?
  - c. Did ESA have a final say in the scope?
2. According to Section 2 of the PAE Supplemental, "The need for the proposed action is to meet demand for scheduled commercial air service within the area, as identified by Alaska Airlines, United Airlines, and Southwest Airlines."

Determination for increased activity has been based on FAA forecasts (see Appendix C of the supplement), as provided by ESA. Further, in discussions with ESA, I was told that the numbers flight increases is based SOLELY on expectations of Alaska, United, and Southwest airlines. This limited review appears to be inadequate to fully validate the reality of demand over the course of the next decades (I use decades because ESA, in their reports have projection as far out as 25 years).

Questions:

- a. Did ESA examine the veracity of the airlines' claims of demand? If so, how; if not, why?
- b. Did ESA look to alternate projects that are intended to reduce the demand for air traffic over the next 20 years? For example, have projected improvements in rail been taken into consideration? More importantly, autonomous cars and highways that allow for 3-digit speeds are starting to be turned into a reality, with a projected coast-to-coast high-speed

highway specifically for autonomous cars in the works. Have any other transportation improvements been taken into consideration to balance against a for-profit organization's business projections? If not, the projections used by ESA are woefully incomplete and do not paint an accurate projection.

3. Did ESA consult with the Secretary of the Interior, per 49 USC § 47101(h)? If so, where is this consultation? If not, why not?
4. Per 49 USC § (g)(2)(C) and (D), Ground access and access to facilities must be considered and integrated with master system plans. However, it appears that this requirement has not been met, as all access impacts have not been considered nor evaluated. Access to facilities is not limited by only a few intersections; all access, including I-5, must be taken into consideration.

Questions:

- a. Why was the scope limited to only a few intersections, when it is not only apparent that I-5 will be impacted, but that I-5 impact consideration is part of DOT planning when reviewing routes and road maintenance?
  - b. When will the other ground access impact be included, per statute? If this study was conducted, why was it not part of the final reports?
5. According to 49 USC § (b)(11), projects should be "administered to encourage projects that employ innovative technology." What innovative technology is going to be included in this project, or does the assessment exclude this requirement?
  6. Impact analysis have been overturned if the applicants:
    - Select a consultant known to have a perspective likely to produce a preferential assessment of the applicant's project; and
    - Attempt to influence the consultant's work by making payment or the lure of future work contingent upon favorable findings.
      - a) What steps had been taken to review past reporting to ensure that the selection of Environmental Science Associates are not an organization who tend to treat Alaska Airlines, United Airlines, and Southwest Airlines with preferential treatment?
      - b) Environmental Science Associates has a proven track record of hiring members of city and county planning organizations; what steps have been made to ensure that ESA is not being unduly influential towards the planning commission? Is EVERY member of the planning commission willing to sign a document that they will not work for ESA?
  7. Per 49 USC § 47106(a)(6)(A), a master plan must take into consideration impacts on solid waste and recycling.
    - a. Where is the data that shows impact to solid waste and does the master plan take this into consideration? A conclusion was issued, but there is no data supporting this conclusion.
    - b. In a discussion with ESA, they informed me that ONLY solid waste that is produced DIRECTLY by the airport and only waste gathered from the cleaning of airplanes was studied. Where is the data around how much waste will be brought into the area along with each passenger arriving?
    - c. It has been acknowledged by both ESA and Snohomish County that businesses supporting the commercial use of Paine Field will be forthcoming (e.g. more hotels,

restaurants, etc...). This has a major impact on solid waste that will be going to the Airport Road transfer station. Did ESA study this? Is so, where is the data; if not, why was this not included?

8. Per 49 USC § 47106(g), the Secretary of Homeland Security MUST be consulted. Has the DHS Secretary been formally consulted? If so, where is the record of that consultation; if not, why?
9. Section 5.10.1 of the PAE Supplemental, the report lists Energy and Utility Use Suppliers will have an impact to the expected use.
  - a. Have increases in use been analyzed to determine if this will have an economic impact to the communicates, as required by 49 USC § 47101(g)(1)? If so, where is the data; if not, why?
  - b. As stated above, the commercial use of the airport will bring about the formation of support businesses. How will the support businesses affect energy and utility use? Will this cause an economic impact to the community (in the form of having to pay for another transfer station, the buying of more power, etc...)?
10. According to the study, in section 6.13.2, the Proposed Action would add 2,185 daily vehicle trips. The study showed that it will not reduce traffic to an intolerable level. But, commercial use of Paine Field adds over 2100 vehicles on our roadways. As noted above, ESA took a VERY limited look at road use.
  - a. The result of road usage pointed to a mitigation fee. Does this mitigation fee include mitigations of road maintenance over a course of time?
  - b. Why did ESA NOT look at on-going economic impacts to the community?
  - c. Why did the ESA not include expected support businesses when conducting traffic increases?
  - d. Was Gibson Traffic Consultants, Inc.'s data reviewed for accuracy and an unbiased result? If so, where is that review; if not, why not?
11. On the subject of traffic, it was pointed out that in some cases traffic would not be worse, because it could not get a lower rating. The reality is that even if traffic has been given an F rating, there is a marked difference between receiving an F rating by going half the speed limit, and an F rating by going 1/10<sup>th</sup> of the speed limit. Where is the final data around traffic?
12. Section 6.16.3.5 states that "The traffic study also notes that mitigation fees would be assessed by local governments to accommodate the anticipated increase in traffic." According to 6.17, many one-time fees have been paid.
  - a. Will there be ongoing mitigation fees to cover the increase in traffic, or will that cost be shifted to the taxpayers?
  - b. As the economic impact to the cities and counties must be assessed, what is the projected additional cost that the taxpayers will have to pay in road maintenance due to this sharp uptake of vehicles on our roads? (NOTE: An ESA representative told me, personally, that ongoing maintenance cost is a county issue not an issue for ESA. However, this WILL have an on-going economic impact to the community at large)
13. Do you have the record regarding Environmental Science Associates' and Gibson Traffic Consultants, Inc.'s recommendation records? Do they lean strongly towards allowance of airport expansions through assessments showing "no impact" (leaning towards the best

interests of Commercial Airline Companies)? Can we get a copies of their recommendation records?

14. I noted in the technical memorandum that “ESA is assisting Alaska Airlines, United Airlines, Inc., and Southwest Airlines Co. with the preparation of a Supplemental EA for Operations Specifications.” It is important to note that ESA was not assisting any local governments or organizations in this matter.
  - a. Did the airlines did pay the county to choose their own, and presumably neutral, organization for the EA assessment?
  - b. What actions were taken to ensure a neutral selection of an assessor, rather than one that would be bias towards the airlines?

Jerry D. Vergeront

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## Response to Comment

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Dear Jerry Vergeront:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following individual responses that apply to your comments.

### **Scope of the Supplemental EA Analysis for Future Operations and Passengers**

The DSEA was prepared in accordance with applicable FAA Orders. The Orders outline FAA accepted methodologies, and preparation of documents based on actions that are “reasonably foreseeable.” The FAA has no evidence that activity levels will be higher than those projected by the airlines, and relied on the proposals submitted by the airlines (**Appendix C**). 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.<sup>4</sup>

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

The evaluation of possible operations or enplanements beyond 2024 would be speculative. Not only would aircraft operation numbers be uncertain, but the types of aircraft flown, the destinations flown, and the time of day or night those operations are also unknown. Any number of possibilities could be imagined, none of which would be based on actions that are reasonably foreseeable. The maximum capacity of the Airport is a theoretical number driven by the physical facility constraints (e.g., terminals and runways) and type of aircraft, and will vary based on the aircraft fleet mix.

Any new airlines (excluding Alaska Airlines, United Airlines, and/or their partners/subsidiaries) or new commercial aircraft types, regardless of airline, desiring to operate at the Airport would be subject to environmental review as these changes would require Operations Specifications Amendments. If the number of passengers exceeded the capacity of the terminal, the terminal would require expansion or a new terminal would need to be built. Any such development would in turn require modification to the Airport Layout Plan (ALP), which would be another federal action, triggering NEPA compliance.

### **Flawed/Inadequate/Biased Supplemental EA**

The DSEA was prepared in accordance with the requirements of NEPA, CEQ regulations, and FAA Order 1050.1F, *Environmental Impacts: Policies and Procedures* and Order 5050.4B, *National Environmental Policy Act (NEPA) Implementing Instructions for Airport Actions*. The FAA has no stake in the Proposed Action and is neutral in its NEPA review and decision-making.

The DSEA provides an appropriate assessment of the potential environmental impacts of the Proposed Action both for existing conditions and reasonably foreseeable future conditions.

During the preparation of the DSEA, the current FAA-approved models were used in all modeling exercises. The DSEA addresses the potential impacts of the Proposed Action based on reasonably foreseeable future conditions compared to the thresholds of significance outlined in the FAA Orders above. Where no thresholds are established, the DSEA considers other factors as defined in FAA Order 1050.1F, Exhibit 4-1, and provides information justifying the level of impact for each affected resource in accordance with FAA Order 5050.4B. The DSEA takes a critical look at the potential impacts that could occur if the Proposed Action is implemented, as required under NEPA.

## **Existing Traffic**

The surface traffic associated with the Proposed Action was analyzed using the existing traffic as the baseline condition (see **Section 5.13** of the FSEA). Local jurisdictions establish thresholds that determine if a road segment or intersection is operating at an acceptable level or at a deficient level of service. Currently all Snohomish County arterials analyzed are operating at acceptable levels of service and are anticipated to remain at acceptable levels of service with funded improvements and the Proposed Action. However, four intersections currently operate at deficient levels of service:

- SR-525 at Beverly Park Road (WSDOT intersection)
- SR-99 at Airport Road (City of Everett intersection)
- I-5 northbound ramps at 128<sup>th</sup> Street SW/SR-96 (WSDOT intersection)
- SR-526 at SR-99/SE Everett Mall Way (WSDOT 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.

## **Traffic Analysis**

The traffic impact analysis for the Proposed Action 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. Additionally, there were several ways in which the trip generation of the Proposed Action and therefore the traffic impacts of the Proposed Action were conservative, meaning the projected impacts of the Proposed Action on the surrounding roadways are higher than what is actually anticipated.

## **Master Plan**

A Master Plan was not part of the Supplemental EA Process. However, Paine Field has requested funding to update the existing Master Plan in 2020, which would include a Recycling, Reuse, and Waste Reduction Plan in accordance with FAA guidance.

## **Department of Homeland Security**

The Airport has been working with TSA for over a year on the Airport Security Plan, to ensure that all security protocols and approvals are in place prior to commencement of passenger service. Airport Staff have been working on security procedures for Security Identification Display Area (SIDA) badging, fencing, coordination with law enforcement for active shooter and potential terrorist threats. Propeller has been working with TSA on staffing, screening, and concerns within the terminal. TSA has worked with Propeller to ensure screening equipment and security features are located in the terminal, consistent with DHS/TSA requirements. The TSA issued a separate NEPA finding on the Federalization of Paine Field-Snohomish County Airport (PAE) Passenger Terminal.

## **Preparation of the Supplemental EA**

FAA guidance allows a Project Proponent to prepare an EA (or Supplemental EA) for actions that are not expected to have significant impacts. The EA is then submitted to the FAA, which reviews the EA, and if it is found to meet FAA requirements, it is accepted by the FAA. Upon acceptance of the Final Supplemental EA, the FAA will decide whether to issue a Finding of No Significant Impact (FONSI), potentially with a Record of Decision (ROD), or prepare an Environmental Impact Statement (EIS).

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From: barbara williams <bigredbabs@msn.com>  
Sent: Friday, November 2, 2018 10:39 PM  
To: Paine Field <paine@esassoc.com>  
Subject: Federal Impact Study on Paine Field - Dated 9/29/18

November 2nd, 2018

To Whom it May Concern:

I have been a resident of Mukilteo, moving from Yakima, WA in 1990, for a total of 28 happy years! After we moved, we started hearing some rumbling about the possibility / concern of the Paine Field being opened up to commercial air traffic! Needless to say we were stunned! We had heard nothing in this regard in the 2 1/2 year investigation of the area before we bought, with emphasis on Mukilteo.

In the years since the airport, including Boeing have been a constant aggravation: We first heard the possibility, and then agreement had been put in place with the City of Everett. In the years that followed. It was coming, not coming, coming and agreement, once again had been made with the City of Everett, we all sunk to our knees thinking what it would mean to 'our Mukilteo! If one was to canvas the area, people who have lived in the area are DREADING the coming! The newbies for the area generally are sucked in by how wonderful and convenient it would be to have commercial 'Airport Terminal' in their front yard. They have no understanding of the fight Mukilteo has put up, against this happening, what is to be expected. They haven't lived it!

All through this period, the noise levels persisted, as well as gotten much worse! Large, loud planes flying over head. Large planes flying over on approach for landing, where I wondered if the landing gear / wheels were going to hit the AMPM or the strip mall across the street, in unincorporated Snohomish County. There were times I could wave to the pilot! or, being in a business when they went over, one had to stop their conversation, I could hear when they were coming, "I hope they have their wheels up! The Boeing factory used to test their engines all day and some times after the 9:00PM curfew. They sounded like the earth was crumbling, they were so loud, I started calling them "Roger Ram Jet"! Every thing you were doing came to a halt, even naps for large and small people! We currently do have VERY large VERT noisy jets taking off in the middle of the day or as late as 2:00AM, which wake us up!

Since I arrived in Mukilteo, with a rural two lane road (Mukilteo Speedway) where the speed limit was 50mph and moderate traffic; to a four lane road with so much traffic at 40mph, a person would be taking their life in their hands to try and cross the street, without a light! The traffic is constant!

Where was the person / people standing when they were measuring traffic? Have they seen our traffic? Has anyone tried to drive through town? The traffic is awful. We have the Large ferries dumping cars, trucks, commercial trucks, 18-wheelers, RV's and attached equipment, twice an hour. The "Boing effect", where not only do their workers drive to parking at their lot at Boeing where there is no more room for parking, but also, drive to a lot in Mukilteo, where workers are loaded on various private busses, twice a day for their shifts, to be dropped at the various stations around the plant vicinity. These busses are on our Mukilteo roads from early morning until I believe, the end of second shift.

There are school busses twice a day, police along with emergency vehicles (aide cars, fire trucks and police) rushing to various emergencies around Mukilteo! Our current traffic situation is deplorable! With the only 'some what less' traffic, being in the middle of the day. Otherwise, the traffic is majorly clogged, where traffic doesn't clear the intersection on a light. From two o'clock until seven or eight o'clock, It is impossible to drive thorough town! Those of us who live here, have learned to try and schedule all of our driving when traffic is less. This is not California but, a small town in Washington state!

We have two roads (State Highway 525 and 526) the Speedway, 525, is on one end a dead end, unless you re going on the ferry to Whidbey Island, going west. The 526 is the "Boeing freeway", which is also almost a dead end, except it dumps into 525 to either go to the ferry or thorough the already crowded business district of Mukilteo. We get a lot of the 'shift' traffic from Boeing. Those who use 526 to go East, find themselves in massive slowdowns and stopped, stacked for a mile or more to get on the ramp 526, to 5N or staying on the 526, to turn to the exit ,going to Seattle on I 5S. Or, continuing to the end of the freeway where it dumps you onto surface streets connecting to Everett. There are major back-ups with standing lines onto the roads in either direction. It is a mess! This is another road 'the natives' avoid at certain times of day.

There once was a road to start on 44th Ave., with easy access, to relieve some of the traffic going to the water AND to run the traffic to the new ferry terminal when built. It was on the Master Plan when we bought here. It was touted as a benefit when my husband and I bought our property in the Harbpor Point office, in 1990. Miraculously, with out anyones knowledge, the road got erased from the Master Plan! We were all dumbfounded! It would have helped to elevate some of our traffic! Now they say a road up through the gulch, would harm the environment! How? There is a rail line there already, for trains to go to and from the Boeing plant! There is room by the tracks to PUT A ROAD!

I have often wondered if the 'impact people' looked at our traffic? There is no way 2,200 cars or more a day, depending on further development, is not going to have increased impact on Mukilteo's way of life! Yes, I understand the entrance to the airport, is on the Airport Road side of Paine Field. It will help, but not all of the pressure is going to be taken off. Passengers with vehicles, will be funneling through all of the current arteries through out Mukilteo!

It was said, back in the 'old' days, only twelve flights a day, with quitter equipment, was proposed. The airport idea quitted down once again...then Propeller started sniffing around, then Alaska came on board, sure enough South West and one other 'would come to the party'! Now we are at 24 flights a day, soon it will be 48, with the expansion the the terminal to be proposed. Then there will be 96 and so on. There, then will be a large Internal Air[port like SeaTac in our front yard! Rules will be changed and it will happen! The traffic would get so out of control! We do not have the land area, due to our beautiful hills to develop more roads. Where can more roads be added, except up in the air, overhead? Know where on the ground, except down the railroad tracks from Boeing!

NO! This is not acceptable for us in our beautiful, tightly knit community, with its views and the Water. Because of the topography of Mukilteo, we are pretty much built up, as we can get. MUKILTEO will get most of the head aches and EVERTT of course, will get all of the money, which this all about any way! This is how our 'rock solid' agreement with the City of Everett, for non development of Pane Field, was some how overturned!

I urge you and your committee to take a deep breath and reevaluate the situation!

Thank you.

Barbara W. Williams  
4840 Park Drive No 103  
Mukilteo, WA 98275  
425 530 8313

Formally of:  
5220 103rd SW  
98275

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## Response to Comment

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Dear Barbara Williams:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### General Responses

- 2-2: Mediated Role Determination (MRD) Document
- 2-4: Aircraft Currently Fly Low and Very Close to Houses
- 3-4: Noise Analysis Methodology
- 3-6: What Are the Existing and Future Noise Impacts?
- 5-1: Existing and Future Traffic
- 5-2: Traffic Analysis

Please also see the following individual response.

### Safety of Low Flying Aircraft

The height of aircraft on final approach to a runway or departure from a runway is established by the FAA. The standard traffic pattern altitude for small propeller aircraft is 1,600 feet Mean Sea Level (MSL), while the traffic pattern altitude for large propeller, turboprop, and jet aircraft is 2,100 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. For safety, as well as other reasons such as noise and weather, it is rare for aircraft to fly below the minimum altitudes.

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**From:** Julie Muschett <julie@dapo.com>  
**Sent:** Friday, November 2, 2018 11:03 PM  
**To:** Paine Field <paine@esassoc.com>  
**Cc:** Julie Muschett <julie@dapo.com>; Harold A Muschett <harold.muschett@merck.com>  
**Subject:** Paine Field Commercial Air Traffic - Questions Regarding Environmental Impact Assessment

To Whom it may concern,

I am writing to request additional information regarding the Environmental Impact Assessment conducted by the FAA for the expansion of commercial service to Paine Field.

I have lived in the area for 19 years and have seen a considerable growth in vehicle traffic in the areas around Paine Field. The conclusion that adding 24 flights a day to Paine Field would have minimal impacts is difficult to understand considering the high level of congestion that currently exists.

What specific traffic mitigation plans have been put in place to manage the additional numbers of vehicles being routed through the area?

The current plans take traffic very near Mariner high school which is also the Mukilteo School District location for district football games and other district events. Have considerations been made for how added vehicle traffic might affect school bus routes as well as potential impacts there would be on travel to and from school events? What mitigation plans have been made for the area around the high school?

Why wasn't a more comprehensive EIS conducted given the magnitude of this change? It would seem with a change of this magnitude there would have been a comprehensive review of the impact to the area rather than a streamlined assessment and just a supplemental assessment with only one public hearing for comment.

We fail to understand how the increase in the number of flights won't increase traffic congestion, pollution and noise. It certainly seems counterintuitive.

We hope a more thorough study will be required.

Regards,

Harold and Julie Muschett

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## Response to Comment

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Dear Harold and Julie Muschett:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### **General Responses**

- 1-1: Adequacy and Use of FAA Guidance
  - 1-2: Scope of the Supplemental EA Analysis for Future Operations and Passengers
  - 1-3: Flawed/Inadequate Supplemental EA
  - 1-5: Additional Study Should be Conducted
  - 1-8: Significance of Project Impacts
  - 1-9: How Is Significance Defined?
  - 5-1: Existing and Future Traffic
  - 5-2: Traffic Analysis
  - 6-11: Mitigation
- 
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**From:** D. <driter206@hotmail.com>  
**Sent:** Friday, November 2, 2018 11:32 PM  
**To:** Paine Field <paine@esassoc.com>  
**Subject:** Public Comment re Paine Field Supplemental Environmental Assessment

To Environmental Science Associates,

I would like to voice my concern related to the latest Paine Field Supplemental Environmental Assessment. The currently proposed level of commercial air traffic at Paine Field would significantly—negatively—impact families and taxpayers living in the surrounding communities.

Can you please respond to the following questions and identify why these issues were not adequately addressed in the Supplemental Environmental Assessment?

- How did you come to the conclusion that there would be no significant impacts from the commercial aircraft noise?
  - I am significantly concerned about noise impacts to surrounding communities and limiting people’s ability to get adequate sleep (due to noise during the day, early mornings & late night flights). This noise can also disrupt the community’s ability to enjoy basic activities like picnics and other outdoor endeavors without the significant disruption of extensive commercial aircraft noise.
- How did you come to the conclusion that there would be no significant impacts to home value reduction?
- How do you determine the criteria that defines a “significant impact”? How do you assess the impact of potential growth in scheduled service?
  - It is clear that scheduled air service will result in many negative consequences—especially noise—and would increase with any growth in the scheduled flights.
- How will you ensure that the cumulative effects of commercial air service will be assessed, including with any growth in air service? What mitigation will be provided for these negative impacts on noise, home values, traffic, etc?
- Given the magnitude of impacts of scheduled commercial air service, why wasn’t a more comprehensive EIS conducted?

Thank you for your consideration of these concerns. I look forward to your response.

Regards,

Dianne Riter  
Everett, WA

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## Response to Comment

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Dear Dianne Riter:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### **General Responses**

- 1-1: Adequacy and Use of FAA Guidance
  - 1-2: Scope of the Supplemental EA Analysis for Future Operations and Passengers
  - 1-3: Flawed/Inadequate Supplemental EA
  - 1-5: Additional Study Should be Conducted
  - 1-8: Significance of Project Impacts
  - 1-9: How Is Significance Defined?
  - 3-6: What Are the Existing and Future Noise Impacts?
  - 6-2: What is the Impact on Property Values?
  - 6-8: Cumulative Impacts
  - 6-11: Mitigation
- 
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From: Susan Dann <suebd07@gmail.com>  
Sent: Saturday, November 3, 2018 1:25 AM  
To: Paine Field <paine@esassoc.com>  
Subject: Passenger Service

Very concerned that noise levels will increase for Woodsound subdivision. We have beautiful evergreen trees and can hear birds singing. Please do not have flight patterns over our area. Very concerned that our housing prices will drop. Please make flight patterns to avoid residential areas so protect the birds and our trees.

Thanks, Susan Dann

Sent from my iPhone

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## Response to Comment

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Dear Susan Dann:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### **General Responses**

3-6: What Are the Existing and Future Noise Impacts?

6-2: What is the Impact on Property Values?

6-5: What is the Impact on Wildlife?

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From: Wanda DeBoli <Wkdeboli@hotmail.com>  
Sent: Saturday, November 3, 2018 1:54 AM  
To: Paine Field <painefield@esassoc.com>  
Subject: Noise concerns Paine field flights

To whom it may concern,

I live in a quiet neighborhood near wildlife-filled forested acreage south of Paine field, near the shoreline in the Meadowdale beach ravine area. I'm very concerned about the prospect of commercial flights having a flight path over this neighborhood as I am convinced that would negatively impact the wildlife in this zone, specifically deer, eagles, owls and quail that have made this area their home. I implore you to avoid establishing a flight path over this fragile and beautiful ecosystem. Thank you for your consideration.

Sincerely,  
Wanda DeBoli  
7126 151st St. SW  
Edmonds, WA 98026  
425-678-8829

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## Response to Comment

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Dear Wanda Deboli:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general response that applies to your comments.

### **General Response**

6-5: What is the Impact on Wildlife?

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**From:** Joe A. Kunzler <growlernoise@gmail.com>  
**Sent:** Saturday, November 3, 2018 2:20 AM  
**To:** Paine Field <paine@esassoc.com>  
**Subject:** 2018-11-02 Joe A. Kunzler Comments on Paine Field Supplemental EA

2 November 2018

Environmental Science Associates  
Paine Field Supplemental EA  
5309 Shilshole Ave NW, Suite 200  
Seattle, WA 98107

Dear Environmental Science Associates;

Thank you for your work so far on the Paine Field Supplemental EA. I am concerned however as a transit user about the lack of study into:

- a) Why people will fly **to** Paine Field other than on a return trip?
- b) Improving transit connections to/from the Future of Flight & Boeing Tour and the Paine Field Commercial Terminal?
- c) Improving transit connections to/from the City of Mukilteo and the Paine Field Commercial Terminal without using Lyft, Uber or a taxi?
- d) Efforts to increase transit & airporter connections to/from the Paine Field Terminal?

That said, I am excited about flying out of and returning to the Paine Field Terminal. I just wish there were better bus connections - both public transit & airporter - to/from the Future of Flight & Boeing Tour and the Paine Field Commercial Terminal in the near future.

Very respectfully;

Joe A. Kunzler  
[growlernoise@gmail.com](mailto:growlernoise@gmail.com)

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## Response to Comment

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Dear Joe Kunzler:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following individual response that applies to your comments.

### **Surface Transportation**

Consideration of increased surface transportation alternatives and improvements is outside of the scope of the Supplemental EA. Paine Field, nor the FAA do not have any control over the programming, design, and implementation of improvements to the surface transportation facilities that serve Paine Field and the surrounding communities. Bus and transit facilities fall under the purview of local jurisdictions (City/County), while improvements to major (county/state/Federal) roadways are the responsibility of the Washington State Department of Transportation (WSDOT).

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**From:** Monika Atkinson <monikaatkinson@yahoo.com>  
**Sent:** Saturday, November 3, 2018 2:24 AM  
**To:** Paine Field <paine@esassoc.com>  
**Subject:** Paine Field

I am writing today as a concerned citizen and taxpayer of Snohomish County. The strong movement underway by Everett developers and some of our elected representatives at the County level, determined to bring commercial service to Paine Field, deeply concerns me. · The Mayors and City Councils of Brier, Edmonds, Lynnwood, Mountlake Terrace, Mukilteo, and Woodway already oppose expansion at Paine Field. · They support the MRD document that has been reviewed six times since 1978 and agree to seek a permanent solution that is legally binding, and support the document known as an Inter Local Agreement. This document would protect the quality of life of the communities while supporting a general aviation status and preserving the exclusive use for the Boeing Company. · The consequences of scheduled service at Paine Field would insure a degradation of property values, thereby lowering the tax revenues for our cities and changing the quality of life for our citizens. · Please consider documented negative health and learning issues that will affect tens of thousands of school children and help engage our school district in this public discussion. · While the proponents of scheduled flights state that a few flights a day will not be disruptive, the reality is that once commercial service is allowed, NO ONE will be able to restrict the type of aircraft, commercial or cargo, the time of day, or the number of flights. Airport noise will be heard county wide, not just in the neighborhoods surrounding the airport. · Commercial service will have ramifications throughout the County. If revenue decreases from the six surrounding cities due to property value degradation, taxes will increase throughout the County. · The county Executive and council members must hear from you - often. As representatives of your city, you have the ability and the influence to remind them; as elected officials they need to balance business interests while retaining the quality of life in our communities. County officials must not be allowed to sacrifice one for the other. · I urge you to continue pressuring our County Council to negotiate in good faith and in the light of day. Currently, they have been listening to insinuations made by a low level FAA representative, Airport Director Waggoner, and developers and business interests. Protect our quality of life in Lynnwood

Sincerely

Monika Atkinson  
Serene Way  
Lynnwood WA 98087

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## Response to Comment

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Dear Monika Atkinson:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### **General Responses**

2-2: Mediated Role Determination (MRD) Document

6-1: What are the Quality of Life Impacts?

6-2: What is the Impact on Property Values?

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Environmental Science Associates / FAA Representatives,

I am a resident of the Picnic Point neighborhood of Edmonds, WA southwest of Paine Field. I would like to advise that from the perspective of a local area resident, the nature of commercial operations proposed is very different than what we experience currently from Boeing operations and general aviation at the airport. Our neighborhood is generally quiet and enjoyable for family recreation in nearby school grounds, parks and beaches. Aircraft noise is quite evident when Boeing commercial type aircraft are flying overhead and thankfully the frequency of those operations is relatively minimal and presently accepted as part of living in this area. Also, general aviation aircraft in the area are not overly intrusive.

However our neighborhood, local schools and my family, would certainly be negatively impacted by significantly increased aircraft noise from establishment of the currently proposed commercial operations at Paine Field, due to both the frequency of flights and type of aircraft to be employed.

Most concerning with this recent Draft Supplemental Environmental Assessment (EA) from Sept 2018 is the way in which this supplemental addition has been used to dramatically change the proposed commercial operating characteristics which were previously reviewed and determined. As you can appreciate, doubling the number of flights per day, increasing night flights and considerably increasing the size of allowable aircraft, are substantial changes for our community relative to what was previously proposed.

### **Aircraft Noise Assessment / Technical Report**

Along with proposing these significant operational revisions, the public has received a projected noise study which is very limiting in information by design. For Paine Field, we would reasonably anticipate industry best practice for such an airport noise assessment. However it appears that the approach used is pursuing minimum standards and focused only within the boundaries of maximum allowable noise thresholds.

Furthermore, the present standard of assessing only DNL 65 dB+ noise contours does not fully or properly consider the direction of **FAA 1050.1F Desk Reference** regarding Section 11.2 'Affected Environment' for the areas neighboring Paine Field. There is a clear case to properly review our surrounding communities as "noise sensitive areas" as defined by the document.

Some applicable points from Section 11.2 under 'The description of current noise conditions includes' are:

- The number of residences or people residing within each noise contour where aircraft noise exposure is at or above DNL 65 dB; or for a larger scale air traffic airspace and procedure action, the population within areas exposed at or above DNL 65 dB, at or above DNL 60 but less than DNL 65 dB, and at or above DNL 45 dB but less than DNL 60 dB
- The location and number of noise sensitive uses in addition to residences (e.g., schools, hospitals, parks, recreation areas) that could be significantly impacted by noise; and

- Maps and other means to depict land uses within the noise study area. The addition of flight tracks may be helpful. Illustrations should be sufficiently large and clear to be readily understood.

For a specific example of the need to assess aircraft noise outside of the DNL 65 dB+ noise contour and beyond the area immediately surrounding the airport:

The local elementary school in our community alone, Picnic Point Elementary, is directly under the departure flight path 16RD4 in Figure F-1 'Fixed-Wing Aircraft Departures' of the Draft Supplemental EA 'Appendix F - Noise. See attached screenshot for reference. Increasing commercial airline traffic over this route will cause noise impacts to our children locally throughout each school day. Additionally, Serene Lake Elementary is only 0.7 miles to the east and would likely also be affected. These are not even the closest schools to Paine Field.

Supporting such educational considerations in the area, the recent Environmental Impact Statement (EIS) for EA-18G Growler Airfield Operations at nearby Naval Air Station Whidbey Island (Sept 2018) went to the extent of including assessment of Classroom Learning Interference (Section 4.4.5) in the Aircraft Noise Study.

See EIS 'Appendix A: Aircraft Noise Study' for reference:  
<http://whidbeyeis.com/CurrentEISDocuments.aspx>

> Please seriously consider that many people in the residential, educational and recreational areas near Paine Field, and in the flight paths, are actually sensitive to frequent larger aircraft noise and would be even more negatively impacted by the current Draft Supplemental EA proposal for significantly increased commercial service.

> Perhaps a complete EIS is also appropriate for Paine Field commercial air service at this time. Is there a plan to consider an EIS for this application?

### **Washington State Noise Assessment References**

Washington State Department of Transportation (WSDOT) Aviation Division provides a 'Airport and Compatible Land-Use Program Guidebook':

<https://www.wsdot.wa.gov/aviation/Planning/ACLUguide.htm>

Appendix B: 'Noise' is attached for reference.

This Washington State document provides a lot of guidance, even based on FAA recommendations, that is far more proactive and progressive toward assessing / addressing airport noise impacts than the standards applied in the Draft Supplemental EA. The document elaborates upon the limitations of the noise contour methods and specifically the DNL 65 dB threshold, as well as the dated basis of Schultz Curve derivation (and this was issued by WSDOT Aviation back in 2011).

To quote from the section on 'Approaches to Addressing Airport Noise Impacts' (page B-4):

"To reiterate, the FAA policy does not preclude local jurisdictions from setting a lower threshold of compatibility for new land use development. In fact, some states like Oregon have passed legislation that requires airports to analyze lower noise level thresholds. The FAA's Aviation Noise Abatement Policy 2000 states: "Based upon local factors, local jurisdictions may take a more comprehensive approach to aviation noise exposure below DNL 65. Some communities are more noise sensitive than others. Part 150 guidelines recognize local discretion to define noise sensitivity." WSDOT encourages communities to seriously examine the significance of noise impacts, along with other compatibility factors such single-event noise levels, low flying aircraft, vibration, odors, annoyance, and other impacts of regular aircraft overflights—and to avoid new development that might be incompatible within the airport influence area."

We expect ESA is well-aware of the requirements to design and determine noise assessment criteria to higher standards and that is what many of us expect in the local community around Paine Field.

These type of practical, community-based considerations may have been factored into the past Paine Field Airport Master Plan and Snohomish County Comprehensive Plan development (by the County), as they should have included WSDOT Aviation consultation, however those plans are not up-to-date and do not account for the additional scale of commercial operations at Paine Field which are currently being proposed.

### **Paine Field Airport Master Plan**

The Paine Field Airport Master Plan did provide a FAR Part 150 Noise Exposure Maps Update back in September 2003 (see attached) which included noise contours for DNL 55 dB for both existing 2002 operations and a projection for 2008 at the time.

We should now assess at least the same level of detail on noise contour levels, to include DNL 55 dB, for current operations and those proposed for both 2019 and into 2024.

- > Why was the equivalent DNL 55 dB contour not provided for this present EA and/or considered in the technical report on noise? Can that information be provided from the existing model now?
- > Paine Field has noise measurement equipment surrounding the airport. Under the current commercial air service proposal, will on-going noise monitoring be required to ensure operation within certain thresholds?

### **Time of Day for Operations**

Night flights are of particular concern for our community, including my family and neighbors. We have children who can be easily disrupted by aircraft noise at night and woken from sleep. Current Boeing operations overnight (in our direction from Paine Field) can occasionally be disruptive already, but they are not consistent or frequent. Scheduled commercial services at night are a much more concerning issue, as well as the potentially for these services to increase over time due to airline customer demand. Understandably for local

area residents, a dB penalty in annual average noise calculations provides very little real-world relief from the event noise generated from commercial aircraft flying overhead nearby at night.

- > Under the current proposal, what controls will be in-place to limit increasing night operations without further assessment?
- > Has there been considerations of a curfew to mitigate the event noise impact at night on the many residential areas surrounding / in the flight path of the airport?

I look forward to your replies and on-going local community consultation.

Regards,  
Calvin Carnegie

Appendix **B**

## Learning More About: Describing and Evaluating Airport Noise Impacts

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### Measuring Airport Noise

#### **Measurement of Sound**

Regardless of whether particular sounds are pleasant to hear or represent annoying or disruptive noise, their physical properties are measured in terms of three basic components: magnitude, frequency, and duration.

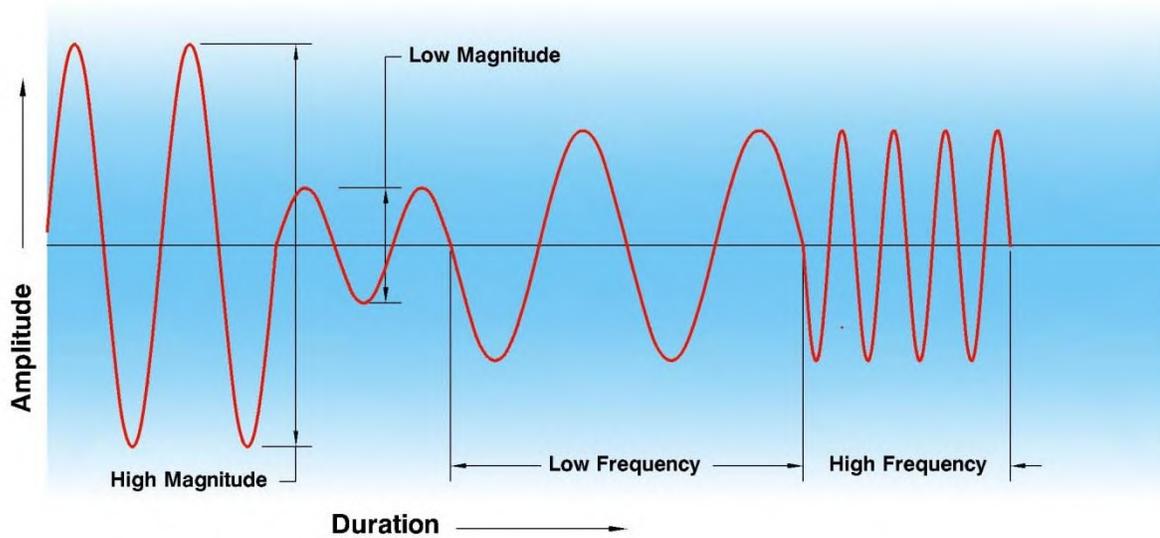
- ♦ **Magnitude.** Magnitude is a measure of the strength or amount of acoustic energy carried by a sound wave. Because the energy level of sounds we can hear varies in magnitude by a factor of 1 to 100 trillion—that is  $10^{14}$  or 1 followed by 14 zeros—we measure magnitude using a logarithmic scale rather than a linear one. Each step in this scale from 0 to 14 is referred to as one *bel* in honor of Alexander Graham Bell. More commonly, each bel is divided into tenths, thus the term *decibel* which is abbreviated as *dB*.

Magnitude is related to loudness, but isn't the same. Loudness describes how we perceive sounds. We perceive any sound level increase of 10 dB (1 bel) as representing a doubling of loudness regardless of whether the increase is from 40 to 50 dB or from 80 to 90 dB. In each case, though, the acoustic energy or magnitude of the sound is actually increasing by a factor of 10.

- ♦ **Frequency.** Frequency describes the spacing between sound pressure waves. We hear differences in frequency as *tone*—a low-pitched tone has a long spacing or wavelength and a high-pitched tone has a short wavelength. Measured relative to the number of cycles per second, the scale used is called *hertz*, abbreviated *Hz*. Most sounds do not consist of a single frequency—a pure tone—but are instead comprised of a mixture of different frequencies, each usually having its own magnitude.

We don't hear all sound frequencies equally well. To balance what we perceive to be equally loud sounds of different frequencies, the measurement of sound magnitude is usually adjusted or weighted using A-weighted decibels expressed as dBA.

**Sound is transmitted through the air when the movement of an object displaces the adjacent air particles which then bump into the next particles and so on. These actions form sets of pressure waves that strike our eardrums, causing them to vibrate and the sound to be heard.**



### Noise Waves

- ◆ **Duration.** The final component is the time period over which a sound occurs. Measuring the duration of a sound is not always as simple as it would seem, however. Many sounds, such as those from an aircraft overflight begin softly, increase to a maximum magnitude, then drop away. Where we begin and end the measurement depends on what we can hear. Moreover, what we can hear often depends on the background or *ambient* sound level. Thus, a sound that barely reaches above the background level may seem to have a short duration, but in a quieter environment, we may find its duration to be much longer. In effect, a high background noise level masks much of the noise from individual aircraft overflights.

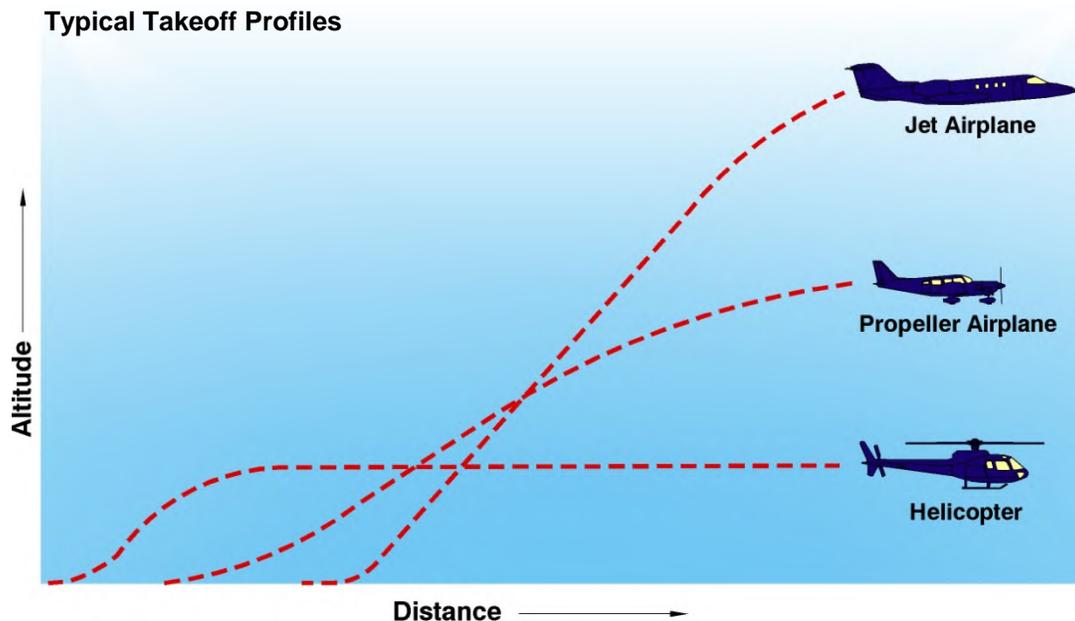
### Noise Variations among Aircraft Types

Different types of aircraft sound differently. The magnitude, frequency, and duration of the sounds they create all differ. Moreover, variations occur not just among different types of aircraft, but even among different overflights of the same type of aircraft. The way the pilot flies the aircraft makes a difference.

- ◆ **Jet Airplanes.** The noise from jet airplanes was once distinct from other aircraft both by being louder and because it had a high pitch that was particularly annoying. Technology has enabled today's jets to be much quieter than their predecessors and the frequency is lower. Pound for pound, modern jets are quieter than equivalent propeller airplanes. However, on average, jets are larger than propeller planes and thus are typically noisier. Research is continuing into making jets still quieter, but there are tradeoffs between noise levels, fuel efficiency, and the amount of emissions produced.
- ◆ **Propeller Airplanes.** The dominant noise from propeller airplanes, whether driven by piston or turbine engines, is from the propeller itself. Unlike jet aircraft, the noise levels produced by propeller airplanes has changed very little over the years. Moreover, the potential for future technology to enable significant noise reduction is limited. Also, private airplanes such as found at general aviation airports are not replaced by newer models at anywhere near the rate common to airline aircraft. In all, no major changes in propeller airplane noise can be anticipated.

- ♦ **Helicopters.** Helicopter noise has unique characteristics. The relatively slow turning main rotor produces an impulsive sound that is particularly noticeable as the helicopter is approaching the listener. The noise is greatest during high-speed cruise and low-speed descents.

The amount of noise generated by different aircraft types is only one factor affecting how much noise is heard on the ground. Atmospheric conditions such as cloud cover that can make the sound bounce back to the ground can affect the noise levels that people hear. Another key factor is the altitude at which the aircraft are flying. In locations close to runways, the distinct performance capabilities of the different aircraft types greatly influences the noise impacts. As the illustration below shows, jets usually need more runway length to take off than propeller planes need, but then they climb much faster. At some point within a couple of miles of the runway end, jets will have reached a higher altitude than the more slow climbing propeller planes and their noise level on the ground will diminish more rapidly as they continue to climb more steeply. Helicopters don't need a runway to get airborne and they climb more steeply than airplanes (although they don't go straight up as is sometimes believed). Also, helicopters generally cruise at lower altitudes than airplanes and fly different routes. Thus several miles from an airport, helicopters may be the loudest aircraft around.



In general, aircraft noise impacts are greater below the takeoff paths than at the arrival end of the runway. These differences, though, depend both on the aircraft type and on the distance from the runway. For example, as depicted by the preceding illustration, at some distance from the runway, jets will have climbed high enough that they may produce much less noise on the ground than the slower climbing propeller airplanes. When landing, all jets and propeller planes follow about the same approach slopes, thus noise differences depend mostly on the aircraft size and engine types. Also, because engines are set to low power levels on approach, the noise produced by the airframe from such features as wing flap and extended landing gear may be greater than the engine noise.

### Noise Contours

Noise contours are used to map or graphically depict areas of equal noise exposure around a noise source, such as an airport or highway. Just about any noise metric data can be illustrated in this manner. For land use compatibility planning purposes, though, noise contours are usually associated

with cumulative noise level metrics such as DNL (day-night level or  $L_{dn}$ ). DNL contours are commonly shown at 5 decibel increments so that they resemble topographic contours.

These days, noise contours for civil airports are produced using an FAA-approved computer program: the Integrated Noise Model, known commonly as INM. Most of the data about the performance capabilities and noise generated by various types of aircraft are stored in the program. The user must enter data regarding the number of operations by each aircraft operating at the airport, the time of day when the operations occurred (day versus night), the runways used, and the flight tracks followed. INM is capable of taking into account the actual ground elevations around an airport, thus increasing the calculated noise levels where the terrain is high and aircraft are consequently flying at a lower altitude than would be the case with flat terrain.

**For many airports, especially those with relatively little activity, noise and other impacts associated with aircraft overflight can be more significant than the noise described by DNL contours. See the discussion of nuisance noise in the next appendix C.**

**To get an idea of how big the noise contours are for some typical small airports, see the illustrations on the next page.**

Preparation of noise contours showing current and projected airport noise impacts is generally done as part of an airport master plan and is usually a required component of environmental documents for airport expansion projects. For busy airports where significant noise impacts, as measured by DNL, extend well beyond the airport boundary, noise contours are an essential airport land use planning tool.

However, for many small airports, particularly those not eligible for Federal Aviation Administration funding, noise contours may never have been done. *This is not a fatal shortcoming to your compatibility planning process and does not mean that you must create noise contours for your airport.* Indeed, when an airport has a low volume of aircraft operations and little or no jet activity, the DNL contours might not extend far beyond the runways. In these situations, overflight impacts as discussed in the next appendix need to be

weighed heavily in compatibility planning.

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## Approaches to Addressing Airport Noise Impacts

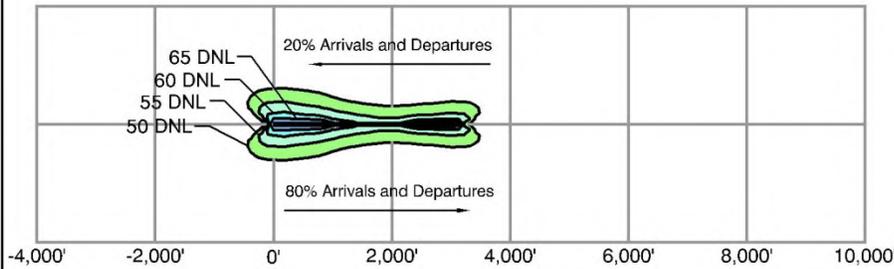
### ***Acceptable Noise Exposure Levels***

Noise impacts are a primary determinant of the acceptance of an airport in a community. Conversely, community planning for new development near airports must take into account the current and projected airport noise levels. The fundamental decision that local agencies will need to make in this regard is what exposure level is acceptable for new development, particularly residential and other noise-sensitive land uses. Your first thoughts on this topic may well be to simply adopt the criteria indicated by the FAA in its Federal Aviation Regulations Part 150, *Airport Noise Compatibility Planning Program*, and in other policies. In FAR Part 150, the FAA considers all uses compatible where the noise exposure is less than 65 dB DNL.

However, this is often not the best noise exposure threshold to use for compatibility planning purposes. Indeed, in other guidelines such as those for addressing the noise impacts of airport expansion, the FAA recognizes that noise impacts may be significant at levels below 65 dB DNL and should be considered depending upon the circumstances. Also, in the assurances that the FAA requires from airports receiving federal grants, the airport sponsor must agree to “take appropriate action, to the extent reasonable, including the adoption of zoning laws, to restrict the use of land adjacent to or in the immediate vicinity of the airport to activities and purposes compatible with normal airport operations.”

**General Assumptions**

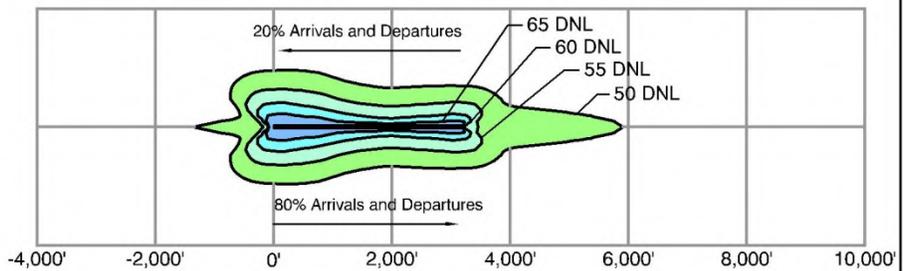
- Straight-in/straight-out flight tracks
- 3,200' Runway
- Airport elevation of 800'
- 85° F is average high temperature for hottest month
- 80% of single-engine piston operations are fixed pitch
- 20% of single-engine piston operations are variable pitch
- 80%-20% runway use distribution



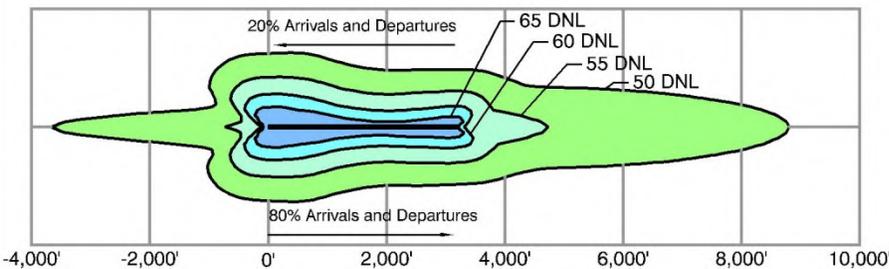
- 3,000 Annual Operations**
- 100% Daytime
  - 100% Single Engine Piston

**10,000 Annual Operations**

- 99% Daytime
- 1% Night Time
- 96% Single Engine Piston
- 3% Twin-Engine Piston
- 1% Light Turbo Prop



J:\PROJECTS\GENERIC\_AIRPORT\_NOISE\_CONTOURS.DWG - DATE: 04 - 2010 - 11:23:50 AM



- 20,000 Annual Operations**
- 98% Daytime
  - 2% Night Time
  - 93% Single Engine Piston
  - 5% Twin-Engine Piston
  - 2% Light Turbo Prop

**Generic Noise Contours  
for Typical Small Airports**

Several facts about the basis for the 65 dB DNL standard are important to recognize:

- The underlying sociological studies date back more than 30 years. Chief among these was one done by Schultz in 1978 which itself was a compilation of prior studies. One product of this study was the so-called “Schultz curve.” This curve shows that 13% of the population living near an airport can be expected to be highly annoyed when the noise exposure is 65 dB DNL. Presumably, the percentage of people who are moderately annoyed would be even higher.
- The studies involved major air carrier airports in noisy urban environments. The degree to which people in quieter communities would be annoyed at lower noise exposures was not studied.
- Even though the loudness of individual jet aircraft operations has been significantly reduced since the 1970s, people continue to be bothered by the noise. This may be due to an increase in the number of operations or simply because people’s expectations regarding quiet are greater.
- Compatibility does not mean that activities will not be disrupted by individual noise events. Even cumulative noise exposures of 60 or 55 dB DNL can include individual loud events that may be disruptive.
- The FAA’s use of the 65 dB DNL as the threshold of environmental impact significance for noise impacts was and largely continues to be driven by economics. Airports can obtain FAA funding to install sound attenuation in homes and other noise-sensitive uses exposed to noise levels of 65 dB DNL or greater. Reducing the standard to a lower noise exposure level would vastly increase the number of buildings eligible and the costs would be large.

To reiterate, the prominence of the 65 dB DNL standard notwithstanding, FAA policy does not preclude local jurisdictions from setting a lower threshold of compatibility for new land use development. The FAA’s Aviation Noise Abatement Policy 2000 states:

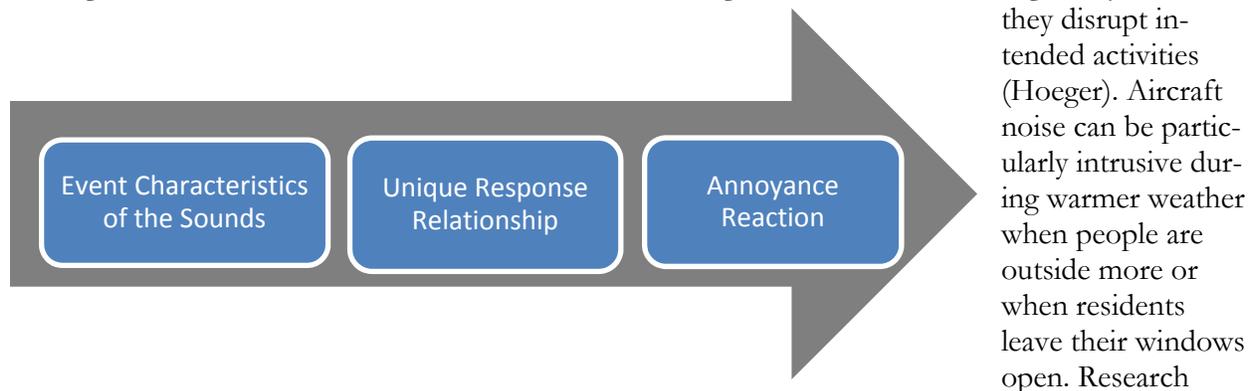
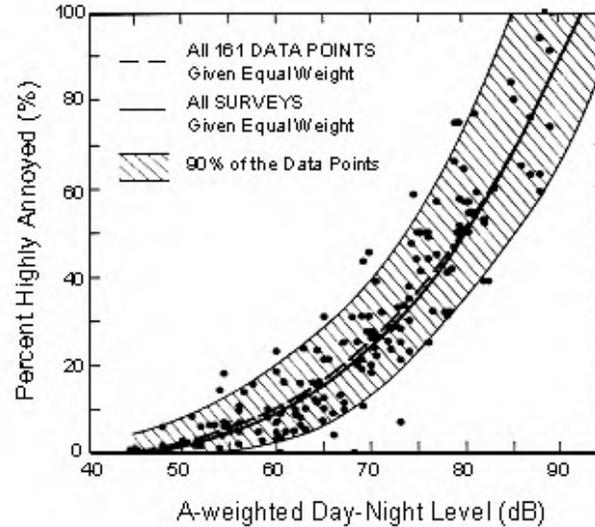
“Based upon local factors, local jurisdictions may take a more comprehensive approach to aviation noise exposure below DNL 65. Some communities are more noise sensitive than others. Part 150 guidelines recognize local discretion to define noise sensitivity.”

WSDOT encourages communities to seriously examine the significance of nuisance noise, noise impacts at levels below 65 dB DNL, along with the single-event noise levels, vibration, odors, annoyance, and other impacts of regular aircraft overflights—and to avoid new development that might be incompatible with these noise levels. The affects of aircraft nuisance noise and the annoyance associated with it, as addressed in the appendix C, should be considered as well.

### The Schultz Curve and Modal Noise Bias

The 65 DNL threshold relies upon the Shultz Curve to identify a level of compatible noise. This is an imperfect approach, since the Shultz Curve fails to take into account the different transportation noise sources, such as road, rail and aircraft. The relationship between different modes and their noise impacts has been described as the exposure-response relationship (Girvin). Empirical evidence suggests that like rail noise, aircraft noise has a unique exposure-response relationship attached to it (Girvin). Simply put, people generally have a predisposition to be biased against aircraft noise. This is sometimes referred to as modal bias. What differentiates aircraft and rail noise from road

noise is the event characteristics of the sound (Hoeger), which affects an individual's annoyance reaction (Hoeger). Aircraft noise is mainly characterized by single events, while road traffic noise is perceived as more or less continuous (Hoeger). Some people also view the sporadic nature of aircraft operations as more obtrusive noise events when compared to other modes, especially when



they disrupt intended activities (Hoeger). Aircraft noise can be particularly intrusive during warmer weather when people are outside more or when residents leave their windows open. Research shows aircraft noise to be more annoying during the night or early morning hours, when ambient noise levels are lower and people are normally sleeping. These intrusive noise events can lead to negative evaluations of the airport, and the noise source can be seen as a highly unpleasant nuisance within the community (Hoeger). Psychological and social conditions are other Other considerations associated with the 65 DNL threshold and the Schultz Curve include:

- The 65 DNL noise contours fail to explore the relationship and interaction between aircraft operations and the community. For example, many airports experience the majority of their operations during VFR conditions. Since outdoor activity is a significant aspect of single family residential development and often takes place during periods of good weather, the two activities often take place simultaneously.
- One weakness of the 65 DNL contour is that it is a prediction, and it's only as good as the forecast and other input assumptions, e.g., flight tracks, fleet mix, etc.
- The studies involved major air carrier airports in noisy urban environments.

## **Noise Insulation**

The mass of buildings' structural components greatly reduces the amount of aircraft noise heard indoors compared to outside. Modern, energy efficient, wood frame buildings typically reduce the exterior to interior noise levels by as much as 30 dB when windows are closed. Even with windows open, other parts of the structure can serve to substantially reduce the indoor sound levels caused by exterior noise.

Heavier structures, such as ones with concrete walls, or buildings designed with added noise insulation features can further enhance the noise level reduction. These qualities have often led to the view that aircraft noise impacts do not need to be a deciding factor in siting of noise-sensitive land uses near airports provided that adequate sound insulation is incorporated into the building design.

Noise insulation should not be thought about in this manner. *The most appropriate application for structural noise insulation is for existing buildings.* It is a method of improving existing incompatible conditions when changing the land use to something less noise sensitive is not practical. Even then, there are limitations. *Noise insulation is not effective for land uses in which noise-sensitive activities take place outdoors.* Unlike the case with ground-based noise sources, sound walls and other such devices do nothing to block noise from aircraft while they are in the air.

*With regard to new development,* noise insulation should be regarded as a measure of last resort. It is not a substitute for good land use compatibility planning in the first place. Exterior noise levels should generally be the primary consideration in evaluation of proposed land uses, especially residential development and other land uses where noise-sensitive outdoor activities are normal and important features.

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Snohomish  
County Airport

PaineField 

FAR Part 150  
Noise Exposure Maps  
Update

» Barnard Dunkelberg & Company

Snohomish  
County Airport

PaineField 

FAR Part 150  
Noise Exposure Maps  
Update

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## Contents

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Contents	<i>iv</i>
Tables	<i>v</i>
Illustrations	<i>v</i>
NEM Checklist	<i>vi</i>
 <b>Snohomish County Airport/Paine Field Part 150 Noise Exposure Maps Update</b>	
Introduction	1
Inventory	1
Aircraft Operations Forecasts Summary	8
Noise Contour Development	9
Consultation	22
Study Advisory Committee	22

## Tables

---

Table 1	Summary of Operations Demand Forecast by Aircraft Type	9
Table 2	Existing and Future Flight Track Utilization - Departures	14
Table 3	Existing and Future Flight Track Utilization - Arrivals	16
Table 4	Existing and Future Flight Track Utilization - Touch and Go	17
Table 5	Existing and Future Runway Utilization Percentage	18

## Illustrations

---

Figure 1	Airport Environs Map	2
Figure 2	Generalized Existing Zoning	4
Figure 3	Generalized Existing Land Use	5
Figure 4	Generalized Future Land Use	7
Figure 5	Noise Monitor Locations	11
Figure 6	Flight Tracks with Existing Land Use	12
Figure 7	Existing (2002) Noise Exposure Map with Existing Land Use	19
Figure 8	Future (2008) Noise Exposure Map with Existing Land Use	20

## FAR Part 150 Noise Exposure Map Checklist

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<b>I. IDENTIFICATION AND SUBMISSION OF MAP DOCUMENT:</b>	<b>Page Number</b>
A. Is this submittal appropriately identified as one of the following, submitted under FAR Part 150:	Cover, Cover Letter
1. A NEM only	Yes
2. A NEM and NCP	No
3. A revision to NEMs which have previously been determined by FAA to be in compliance with Part 150?	Yes
B. Is the airport name and the qualified airport operator identified?	Cover
C. Is there a dated cover letter from the airport operator which indicates the documents are submitted under Part 150 for appropriate FAA determination?	Yes
 <b>II. CONSULTATION: [150.21 (b), A150.(a)]</b>	
A. Is there a narrative description of the consultation accomplished, including opportunities for public review and comment during map development?	22-24, Appendix
B. Identification:	
1. Are the consulted parties identified?	22-24, Appendix
2. Do they include all those required by 150.21 (b) and A150.105 (a)?	Yes, 22-24, Appendix
C. Does the documentation include the airport operator's certification, and evidence to support it, that interested persons have been afforded adequate opportunity to submit their view, data, and comments during map development and in accordance with 150.21 (b)?	Cover Letter, 22-24, Appendix
D. Does the document indicate whether written comments	

were received during consultation and, if there were comments, that they are on file with the FAA region? 22-24, Appendix

III. **GENERAL REQUIREMENTS:** [150.21]

A. Are there two maps, each clearly labeled on the face with year (existing condition year and 5-year)? 19-20

B. Map currency:

1. Does the existing condition map year match the year on the airport operator's submittal letter? Yes, 19

2. Is the 5-year map based on reasonable forecasts and other planning assumptions and is it for the fifth calendar year after the year of submission? Yes, 20

3. If the answer to 1 and 2 above is no, has the airport operator verified in writing that data in the documentation are representative of existing condition and 5-year forecast conditions as of the date of submission? N/A

C. If the NEM and NCP are submitted together:

1. Has the airport operator indicated whether the 5-year map is based on 5-year contours without the program vs. contours if the program is implemented? Cover Letter

2. If the 5-year map is based on program implementation:  
a. are the specific program measures which are reflected on the map identified? No

b. does the documentation specifically describe how these measures affect land use compatibilities depicted on the map? No

3. If the 5-year NEM does not incorporate program implementation, has the airport operator included an additional NEM for FAA determination after the program is approved which show program implementation conditions and which is intended to replace the 5-year NEM as the new official 5-year map? N/A

IV. **MAP SCALE, GRAPHICS, AND DATA REQUIREMENTS:**  
[A150.101, A150.105, 150.21 (a)]

A. Are the maps of sufficient scale to be clear and readable (they must not be less than 1" to 8,000') and is the scale indicated on the maps? Yes, 19-20

- B. Is the quality of the graphics such that required information is clear and readable? Yes, 19-20
  
- C. Depiction of the airport and its environs.
  - 1. Is the following graphically depicted to scale on both the existing condition and 5-year maps:
    - a. Airport boundaries Yes, 19-20
    - b. Runway configurations with runway end numbers No
  - 2. Does the depiction of the off-airport data include:
    - a. A land use base map depicting streets and other identifiable geographic features Yes
    - b. The area within the 65 Ldn (or beyond, at local discretion) Yes
    - c. Clear delineation of geographic boundaries and the names of all jurisdictions with the 65 Ldn (or beyond, at local discretion) Yes
  
- D. 1. Continuous contours for at least the Ldn 65, 70, and 75? Yes, 19-20
- 2. Based on current airport and operational data for the existing condition year NEM, and forecast data for the 5-year NEM? 9, 19-20
  
- E. Flight tracks for the existing condition and 5-year forecast time frames (these may be on supplemental graphics which must use the same land use base map as the existing conditioned and 5-year NEM), which are numbered to correspond to accompanying narrative? 10, 12
  
- F. Locations of any noise monitoring sites (these may be on supplemental graphics which must use the same land use base map as the official NEMs) Yes, 11
  
- G. Noncompatible land use identification:
  - 1. Are noncompatible land uses within at least the 65 Ldn depicted on the maps? Yes, 19-20
  - 2. Are noise sensitive public buildings identified? Yes
  - 3. Are the noncompatible uses and noise sensitive public buildings readily identifiable and explained on the map legend? Yes
  - 4. Are compatible land uses, which would normally be

considered noncompatible, explained in the accompanying narrative? N/A

V. NARRATIVE SUPPORT OF MAP DATA: [150.21 (a), A150.1, A150.103]

- A. 1. Are the technical data, including data sources, on which the NEMs are based adequately described in the narrative? Yes
- 2. Are the underlying technical data and planning assumptions reasonable? Yes

- B. Calculation of Noise Contours:
  - 1. Is the methodology indicated?
    - a. Is it FAA approved? Yes, 9
    - b. Was the same model used for both maps? Yes
    - c. Has AEE approval been obtained for use of a model other than those which have previous blanket FAA approval? N/A
  - 2. Correct use of noise models:
    - a. Does the documentation indicate the airport operator has adjusted or calibrated FAA-approved noise models or substituted one aircraft type for another? No
    - b. If so, does this have written approval from AEE? N/A
  - 3. If noise monitoring was used, does the narrative indicate that Part 150 guidelines were followed? Permanent Monitors
  - 4. For noise contours below 65 Ldn, does the supporting documentation include explanation of local reasons? (Narrative explanation is highly desirable but not required by the Rule.) Cover Letter

- C. Noncompatible Land Use Information:
  - 1. Does the narrative give estimates of the number of people residing in each of the contours (Ldn 65, 70 and 75, at a minimum) for both the existing condition and 5-year maps? Yes, 21
  - 2. Does the documentation indicate whether Table 1 of Part 150 was used by the airport operator? Cover Letter, 21
    - a. If a local variation to Table 1 was used:
      - (1) does the narrative clearly indicate which adjustments were made and the local



## **Snohomish County Airport/Paine Field Part 150 Noise Exposure Maps Update**

---

### **Introduction**

The noise exposure maps for Paine Field were originally prepared as a component of a Part 150 Noise and Land Use Compatibility Study that was adopted by Snohomish County in July 1995. Those noise exposure maps, with a five-year planning horizon, are now out of date and the adopted forecasts contained in the 2002 Master Plan Update for Paine Field have been used as a basis to formulate updated Noise Exposure Maps.

The need to update the noise exposure maps was identified as a result of the public meetings and process used in the preparation of the 2002 Master Plan Update. Aircraft operation numbers and types of aircraft have changed since the preparation of the last Noise Exposure Maps, especially with the removal of military helicopter operations from the airport. The Noise Compatibility Recommendations contained in the previous Part 150 Study have not been amended and are still current.

### **Inventory**

Paine Field is located in an unincorporated area of Snohomish County. The northern and eastern portion of airport property abuts the City of Everett, while the western portion of airport property abuts the City of Mukilteo. The corporate boundaries of the cities of Lynnwood and Edmonds are approximately three miles to the south of airport property. The relationship of Paine Field to the surrounding cities is illustrated in the following figure, entitled *AIRPORT ENVIRONS MAP*.

The following narrative provides a general description of the existing land uses, land use zoning, and future land uses in the area surrounding Paine Field.

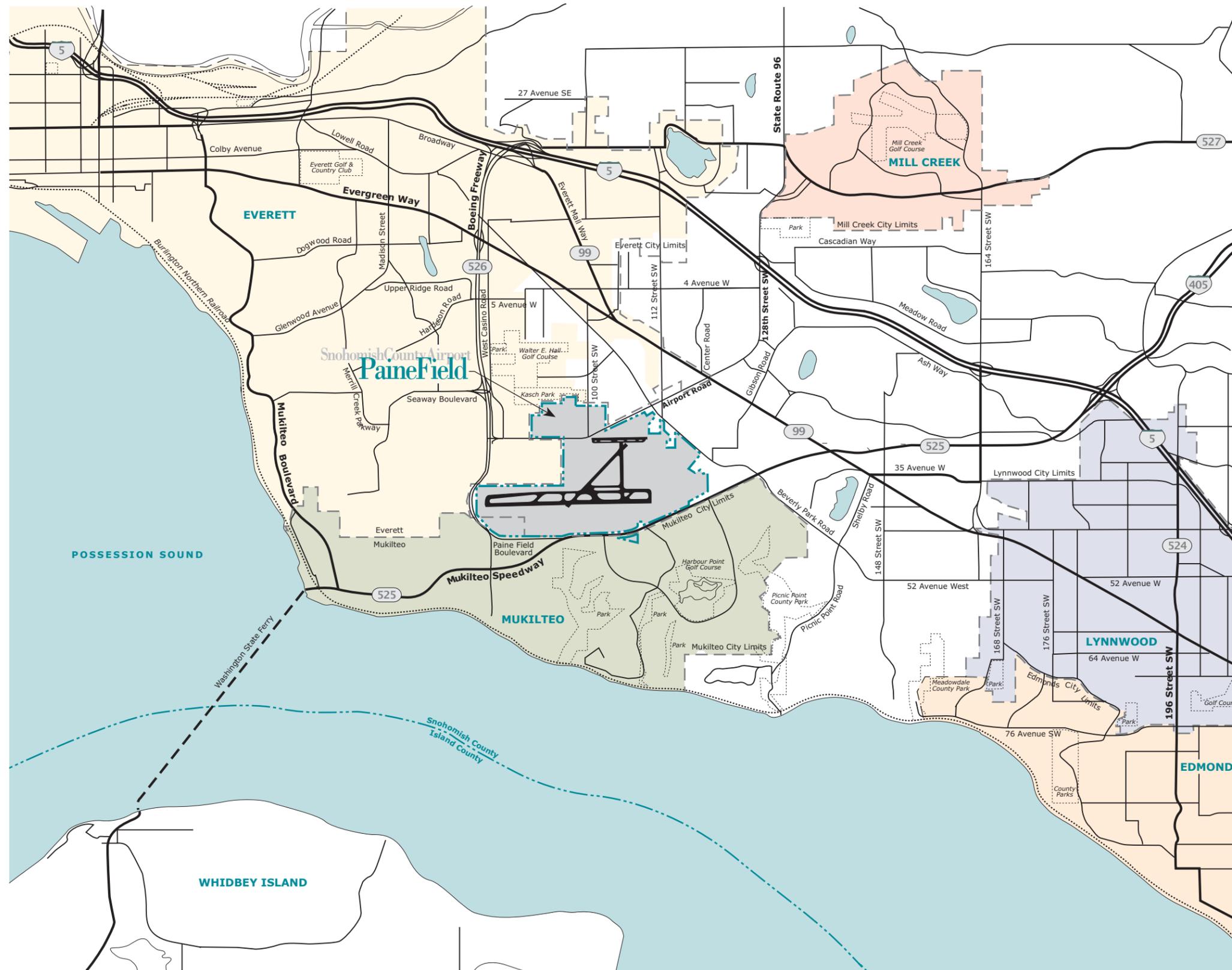


Figure 1  
Airport Environs Map

- Edmonds
- Everett
- Lynnwood
- Mill Creek
- Mukilteo

1" = 6,000'



NOISE

EXPOSURE

MAP UPDATE

**PaineField**  
Snohomish County Airport

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

## Existing Zoning

Generalized existing zoning within the vicinity of Paine Field is illustrated in following figure, entitled *GENERALIZED EXISTING ZONING*, reflecting the zoning designations of the cities of Everett and Mukilteo, along with those for the unincorporated areas of Snohomish County. For purposes here, zoning is categorized into the following types: residential, commercial (including office), industrial, and open/parks. The airport itself is zoned light industrial.

In the area north of the airport, there is a large manufacturing/industrial and office zoning tract associated with the Boeing facilities. The area north of the airport and adjacent to Possession Sound is primarily zoned residential. Some commercial zoning does exist north of the airport associated with the ferry landing and at the intersection of Mukilteo Speedway and Mukilteo Boulevard.

The area east of the airport is characterized by residential zoning with strips of commercial zoning along the major roadways, i.e., SR 99 and Airport Road. In addition, Kasch Park and Walter E. Hall Golf Course are located directly east of airport property, south of Casino Road.

The area directly southeast of the airport is dominated by business park and residential zoning, while southwest of the airport, zoning uses along Mukilteo Speedway are characterized by a combination of general commercial, community business, industrial, and manufacturing. General commercial and community business zoning extend laterally along SR99. The area south of the airport is dominated by various residential uses, with dispersed areas of commercial and industrial zoning.

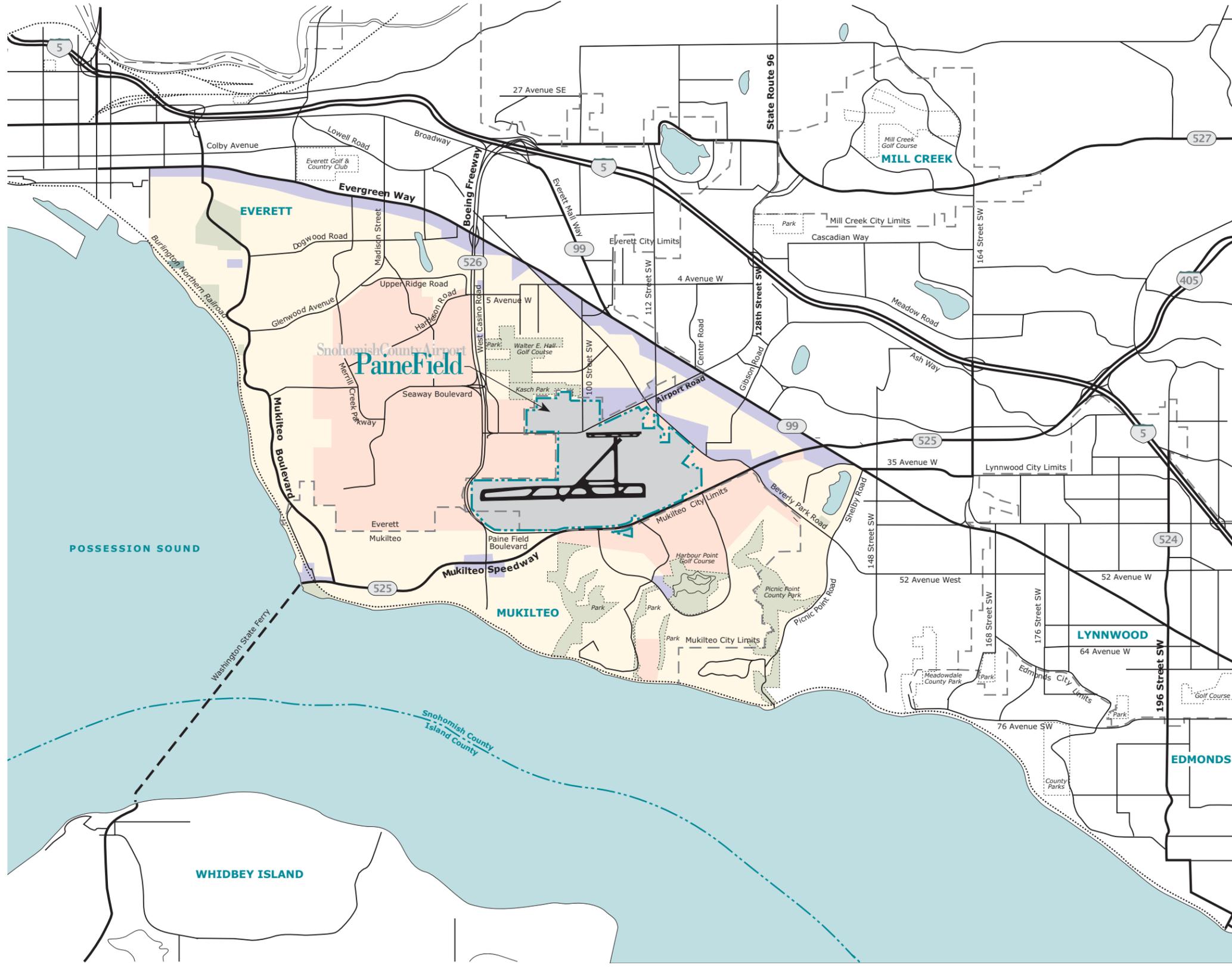
Within Mukilteo, west of the airport, lies the Harbour Pointe Community zoned primarily for residential uses, with several areas of park/open space and community business. In the northwest portion of Mukilteo, zoning consists of residential uses, waterfront mixed use and downtown business district.

## Existing Land Use

As illustrated in Figure 3, entitled *GENERALIZED EXISTING LAND USE*, land use basically reflects existing zoning. In the area directly adjacent to the airport, industrial and commercial uses prevail; one notable exception is the residential area west of Paine Field Boulevard. Commercial uses are found along major arterials and at the intersections of these arterials. Densities of residential use vary in the area, but generally reflect single-family, suburban development with areas of open space. Additionally, significant clusters of multi-family development exist laterally along Casino Road, between Airport Road and SR99; along 112<sup>th</sup> St. SW, between SR99 and I-5; and along

Figure 2  
Generalized  
Existing Zoning

- Airport Property 
- Residential 
- Commercial 
- Industrial/Office Park 
- Parks/Open Space 
- Outside of Study Area 



1" = 6,000'



NOISE  
EXPOSURE  
MAP UPDATE

PaineField  
Snohomish County Airport

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

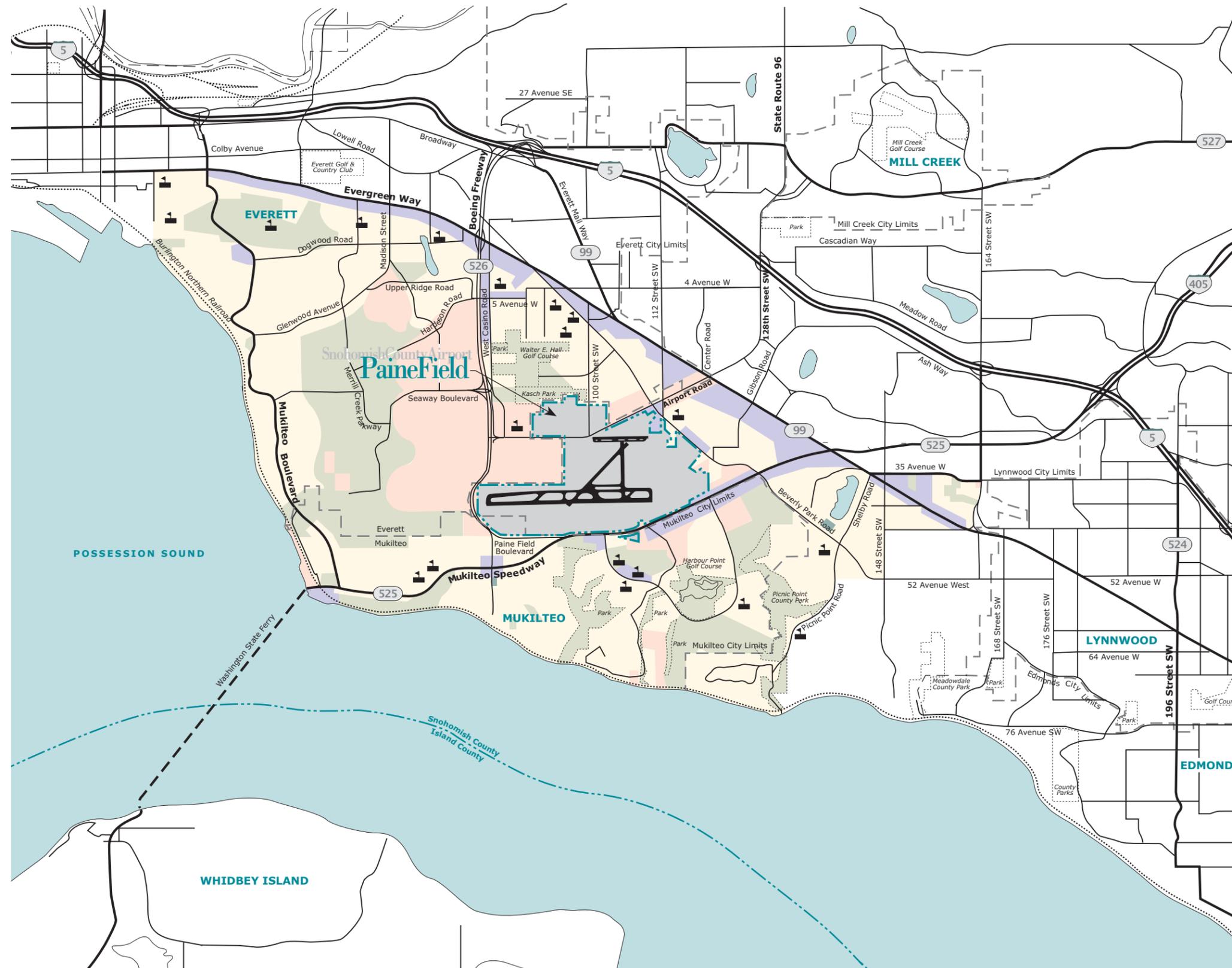


Figure 3  
Generalized  
Existing Land Use

- Airport Property
- Residential
- Commercial
- Industrial/Office Park
- Undeveloped/Parks/Open Space
- Schools ■
- Outside of Study Area

1" = 6,000'



NOISE

EXPOSURE

MAP UPDATE

**PaineField**  
Snohomish County Airport

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

128<sup>th</sup> St. SW, between SR99 and I-5. The waters of Possession Sound are located approximately one and one-half miles west of the airport property and approximately two miles north of the airport. In addition, it should be noted that there is a substantial amount of land which is undeveloped or dedicated to parks/open space in the vicinity of the airport.

Several large tracts of undeveloped land exist within the environs on the airport. Some of these are associated with parks, or areas with limited development potential because of steep slopes or drainage features. There are two large open spaces near the airport; the west side of airport property and the area directly north and west of The Boeing Company plant.

### Future Land Use

Generalized future land use within the vicinity of Paine Field is illustrated in Figure 4, entitled *GENERALIZED FUTURE LAND USE*. Information supplied by Snohomish County shows that Paine Field has been designated as urban industrial. Urban Commercial is adjacent to SR99, on both the east and west portions, extending from 112<sup>th</sup> St. SW to 164<sup>th</sup> St. SW. Situated between SR99 and Beverly Park Road, urban medium density residential is the dominant classification, with a small pocket of urban high density residential. South and east of SR99, various densities of residential use make up future land uses. Several “Centers Designations” have been established at various locations in and around Paine Field. These centers represent the focal point of commercial and employment activity and include: Paine Field Airport, the intersection of Airport Road and SR99, the converging point of Mukilteo Speedway, SR99, and SR525, the intersection of 128<sup>th</sup> St. SW and Interstate 5 (I-5), and the intersection of Interstate 5 (I-5) and 164<sup>th</sup> St. SW.

Southwest/west of Paine Field, an approximately 1/3 to 1/2 mile band of commercial and light industrial tracts parallel Mukilteo Speedway. Further west, extending down toward Puget Sound is the Harbour Pointe Golf Course, multi-family and single family residential land uses. West and northwest of Paine Field, land uses consist mostly of single family residential with small pockets of commercial and parks/open space.

### Existing Noise Abatement Procedures

The airport has established noise abatement procedures. A copy of the noise abatement procedure pamphlet is in the Appendix.

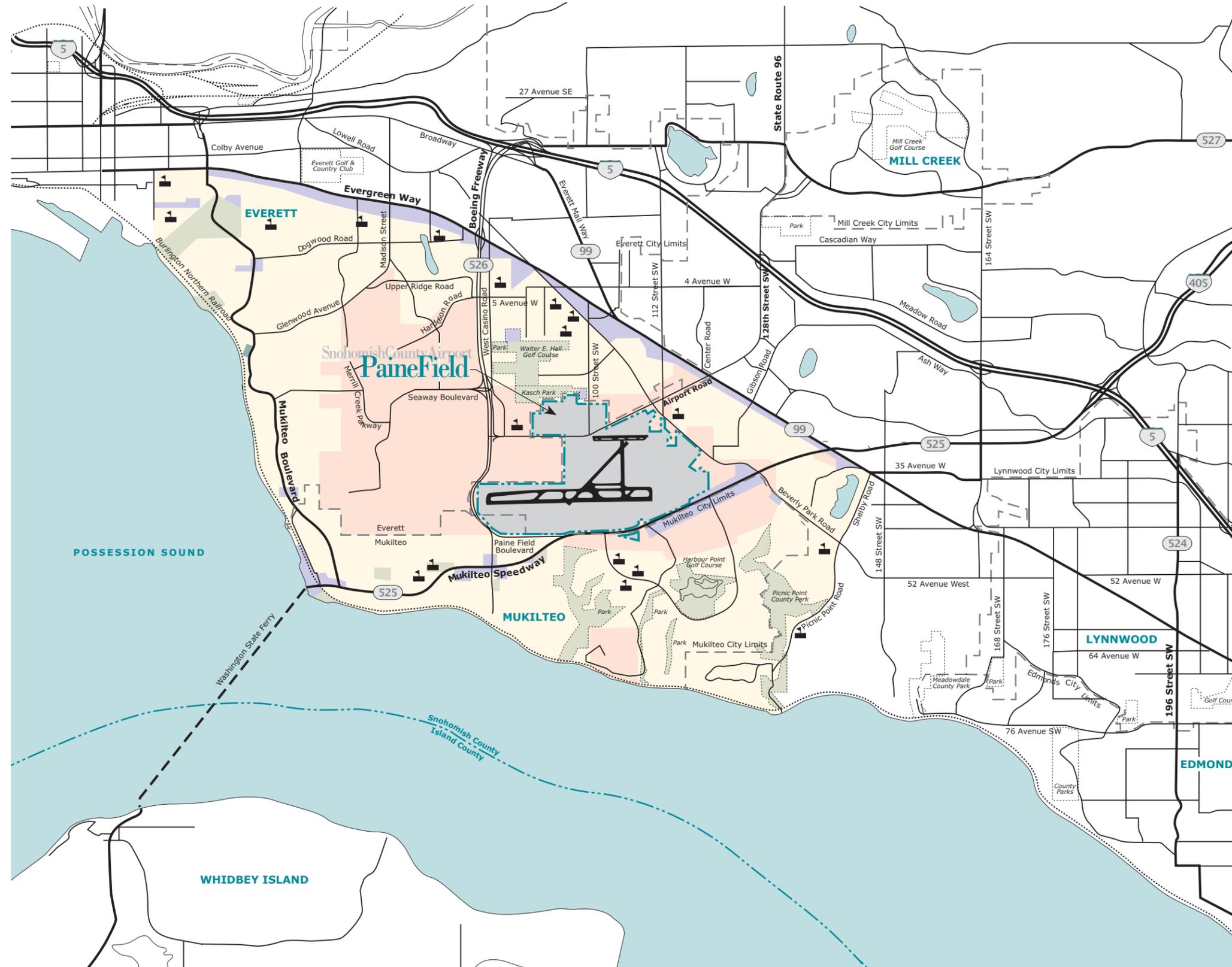


Figure 4  
Generalized  
Future Land Use

- Airport Property
- Residential
- Commercial
- Industrial/Office Park
- Parks/Open Space
- Outside of Study Area

1" = 6,000'



NOISE

EXPOSURE

MAP UPDATE

**PaineField**  
Snohomish County Airport

Source: Snohomish County Planning Department Mapping, Aerial Photography, and United States Geological Survey (USGS) Quadrangle Sheets. Future Land Use: City and County Comprehensive Plans.

## Aircraft Operations Forecasts Summary

As stated previously, the aircraft operations forecasts were developed as part of the recently completed Airport Master Plan Update. These forecasts are summarized below. Paine Field will continue to be the primary general aviation and industrial aviation airport serving Snohomish County and the northern portion of the Seattle Metropolitan area. In addition, the forecasts indicate that, to some degree, there is unconstrained demand for commercial passenger service at an airport in the vicinity of Paine Field.

The following table, entitled *SUMMARY OF OPERATIONS DEMAND FORECAST BY AIRCRAFT TYPE*, summarizes the activity for current (calendar year 2002) and expected future (calendar year 2008) aircraft operational activity. Although the forecasts are based on "unconstrained demand", without regard to site-specific physical or environmental constraints, it is realized that conditions on the airport and in the area surrounding the airport will influence the type and quantity of aviation activity which can be reasonably accommodated. The forecasts are consistent with the 1978-79 Mediated Role Determination defined for Paine Field.

It should be noted that 2002 data provided in the following table includes an estimate of aircraft operations that occur during hours when the ATCT is closed (9:00 pm to 7:00 am), which were not included in the 2002 Master Plan Update documentation. This estimate of operations during the time of ATCT closure was critical for the Noise Exposure Map Update because nighttime aircraft operations (those occurring between 10:00 pm and 7:00 am) receive a penalty in the computerized noise model that is used to generate noise contours (see additional explanation in the *Aircraft Operations Data and Flight Tracks* section below). Because the Noise Exposure Maps are the "official" maps used for land use planning in the vicinity of the airport, an estimate of nighttime operations is necessary to most accurately depict noise contours. The 2008 forecast numbers provided in the table below also includes consideration of aircraft operations that occur during nighttime hours.

It is also important to point out that although the future (2008) forecast of aircraft operations used for this INM update is extrapolated from of the adopted forecast numbers provided in the 2002 Master Plan Update; the 2008 number incorporates some recalibration related to recent historic events and trends (the events of September 11, 2001 and subsequent economic downturn effects on general aviation) and the inclusion of nighttime aircraft activity estimates.

Table 1  
**SUMMARY OF OPERATIONS DEMAND FORECAST BY AIRCRAFT TYPE**  
*Paine Field Noise Exposure Map Update*

Operations By Type <sup>1</sup>	2002 Day	2002 Night	2008 Day	2008 Night
<i>Industrial Aviation Air Carrier</i>				
Jet	3,545	71	6,060	121
<i>Military</i>	1,295	44	2,020	70
<i>General Aviation</i>	197,894	7,283	274,438	10,077
Single Engine Piston	168,210	6,393	230,523	8,760
Multi-Engine Piston	15,832	475	21,685	650
Turboprop	5,937	178	9,605	288
Business Jet	5,937	178	9,605	288
Helicopter	1,978	59	3,020	91
<i>Passenger Air Carrier/Commuter</i>	---	---	10,619	212
Jet	---	---	3,716	74
Turboprop	---	---	6,903	138
<b>TOTAL ANNUAL OPERATIONS</b>	<b>202,734</b>	<b>7,398</b>	<b>293,137</b>	<b>10,480</b>

Source: Barnard Dunkelberg & Co.

<sup>1</sup> Existing – ATCT Counts During Hours of Operation (7:00 am to 9:00 pm) Plus Airport Staff Estimate for Hours When ATCT is closed.

## Noise Contour Development

### Noise Monitoring

No noise monitoring was done specifically for this NEM Update; however, the airport's noise monitoring system was used to help evaluate the noise contours.

### Noise Contours Development Explanation

The DNL noise contours were generated using the Integrated Noise Model (INM) Version 6.0c, which is the most current computer program developed by the Federal Aviation Administration specifically for modeling the noise environment at airports. The INM program requires the input of the physical and operational characteristics of the airport. Physical characteristics include runway end coordinates, displaced thresholds, airport altitude, topography, and temperature. Operational characteristics include aircraft mix and flight tracks. Optional data that can be incorporated in the model includes approach and departure profiles, approach and departure procedures, and aircraft noise

curves. Data from Paine Field's Aircraft Flight Tracking and Environmental Monitoring System (AFTEMS) was used to calculate the INM flight tracks and noise levels.

### **Aircraft Operations Data and Flight Tracks**

The percent of aircraft operations that occur during the nighttime is also presented in the previously presented table entitled, *SUMMARY OF OPERATIONS DEMAND FORECAST BY AIRCRAFT TYPE*. In the DNL metric, aircraft operations that occur after 10 pm and before 7 am are considered more intrusive and receive a 10 dBA penalty. As there is not a twenty-four hour tower at Paine Field, the nighttime operations are an estimate, and may reflect a "worst case" scenario for such operations. Aircraft flight tracks, runway utilizations and profiles were obtained by observations during on-site visits; review of Air Route traffic radar plots, discussion with the Air Traffic Control personnel, discussion with airport management, data provided in the 1995 FAR Part 150 Study, and data from the airport's Aircraft Flight Tracking and Environmental Monitoring System (AFTEMS). The flight tracks are shown in the following figure, entitled *FLIGHT TRACKS WITH EXISTING LAND USE*, which is a computer plot of the actual flight tracks used in the INM. It must be remembered that these are generalized average flight tracks and are not intended to illustrate the exact location that aircraft fly on each track. Flight tracks are the same for both the existing and future conditions.

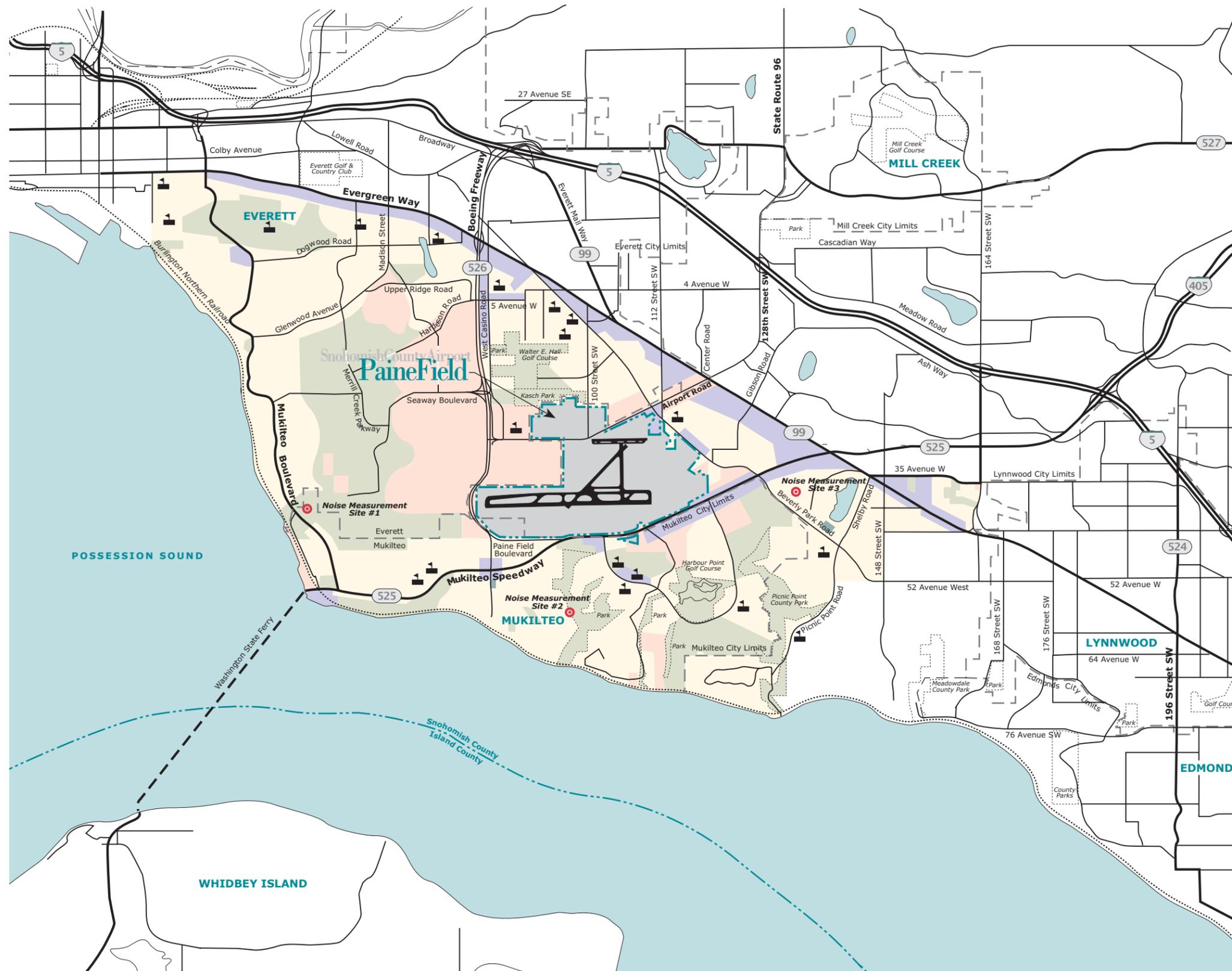


Figure 5  
Noise Measurement  
Locations

- Airport Property
- Residential
- Commercial
- Industrial/Office Park
- Undeveloped/Parks/Open Space
- Schools
- Outside of Study Area
- Noise Monitor Location

1" = 6,000'



NOISE

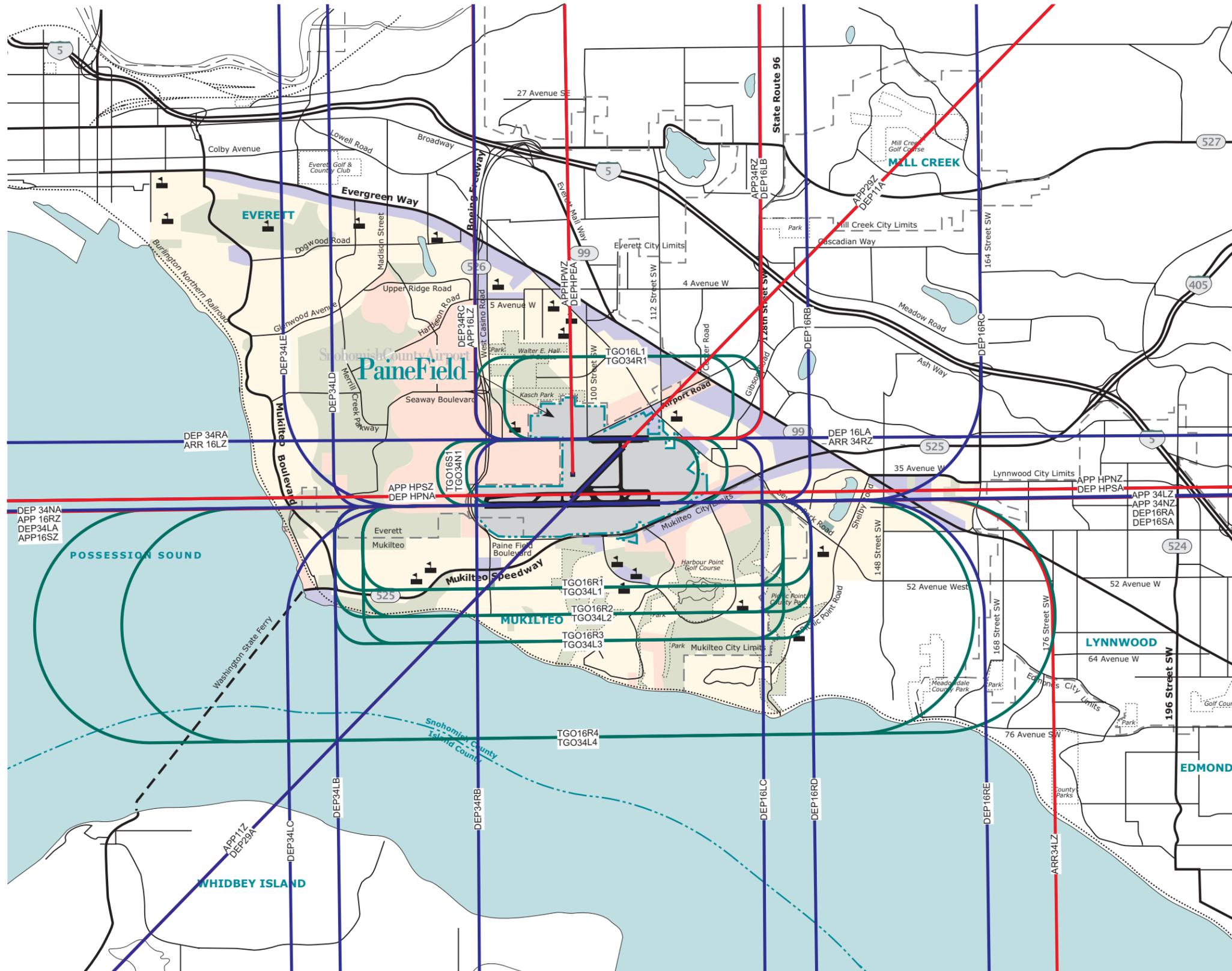
EXPOSURE

MAP UPDATE

**PaineField**  
Snohomish County Airport

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

Figure 6  
Flight Tracks with  
Generalized Existing Land Use



- Airport Property
- Residential
- Commercial
- Industrial/Office Park
- Undeveloped/Parks/Open Space
- Schools
- Outside of Study Area

1" = 6,000'



NOISE

EXPOSURE

MAP UPDATE

PaineField  
Snohomish County Airport

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

An additional important factor in developing the noise contours is the percent of time each runway is utilized. The runway that is utilized by an aircraft is dictated by the speed and direction of the wind. From a safety and stability standpoint, it is desirable, and at times necessary, to arrive and depart an aircraft toward the direction of the wind. When the wind direction changes, the aircraft operational activity will shift to the runway that favors the new wind direction. The runway utilization and percent of use of each flight track is presented in the following tables entitled *EXISTING AND FUTURE FLIGHT TRACK UTILIZATION – DEPARTURES*, *EXISTING AND FUTURE FLIGHT TRACK UTILIZATION PERCENTAGE – ARRIVALS* and *EXISTING AND FUTURE FLIGHT TRACK UTILIZATION PERCENTAGE – TOUCH AND GO*. In addition, the utilization of the runways broken down by day and night is provided in Table 5, entitled *EXISTING AND FUTURE RUNWAY UTILIZATION PERCENTAGE*. The contours also reflect the engine run-ups (trims) that the Boeing Company and Goodrich, Inc. perform.





Table 3  
**EXISTING AND FUTURE FLIGHT TRACK UTILIZATION PERCENTAGE – ARRIVALS**  
*Paine Field Noise Exposure Map Update*

Aircraft	Existing (ops/day)	Future (ops/day)	Flight Tracks Use By Percentage								
			16LZ	34LZ	16LZ	34RZ	11Z	29Z	HPNZ	HPSZ	HPWZ
GASEPF	89.0793	122.1914	26	21	27	23	1	2			
GASEPV	22.1208	30.3154	41	34	13	10	1	1			
BEC58P	15.1811	20.7935	41	34	13	10	1	1			
CNA441	6.5770	10.6368	55	45							
CL600	0.6556	1.0604	55	45							
G II	0.5911	0.2456	55	45							
CNA500	1.3287	1.4385	55	45							
G IV	0.8839	2.1403	55	45							
CNA750	3.8340	6.9119	55	45							
B206L	2.8523	4.3582							40	40	20
DHC830	0.0000	9.4566	55	45							
CL601	0.0000	5.0901	55	45							
737-300	0.1701	0.3556	55	45							
737-400	0.1168	0.2441	55	45							
737-500	0.0330	0.0690	55	45							
737-700	0.2437	0.5095	55	45							
747-200	0.0178	0.0371	55	45							
747-400	0.3945	0.8247	55	45							
767-300	0.3448	0.7207	55	45							
767-400	0.4123	0.8618	55	45							
777-200	0.7215	1.5082	55	45							
777-300	0.1066	0.2229	55	45							
757PW	0.4544	0.9499	55	45							
757RR	0.2412	0.5041	55	45							
767JT9	0.1315	0.2749	55	45							
MD-81	0.0869	0.1491	55	45							
C-130	0.0174	0.0271	55	45							
727EM1	0.1157		55	45							
727EM2	0.3329		55	45							
727QF	0.0718		55	45							
DC9Q7	0.0071		55	45							
DC9Q9	0.0569		55	45							
DC-10/40	0.0107		55	45							
737N17	0.1848		55	45							
737QN	0.0498		55	45							
<b>TOTAL</b>	<b>147.426</b>	<b>221.8974</b>									

Table 4  
**EXISTING AND FUTURE FLIGHT TRACK UTILIZATION PERCENTAGE – TOUCH AND GO**  
*Paine Field Noise Exposure Map Update*

Aircraft	Existing (ops/day)	Future (ops/day)	Flight Tracks Use By Percentage									
			16R1	16R2	16R3	16R4	34L1	34L2	34L3	34L4	16L1	34R1
GASEPF	193.0051	264.7480	10	10	5		8	8	4		31	24
GASEPV	47.9285	65.6834	9	17	17		7	14	14		12	10
BEC58P	13.0124	17.8230	9	17	17		7	14	14		12	10
CNA441	3.2885	5.3184			15	40				10	35	
CL600	0.3278	0.5302				55					45	
G-II	0.1314	0.0546				55					45	
CNA500	1.1473	1.8556				55					45	
G-IV	0.1964	0.4756				55					45	
737-300	0.1458	0.3048				55					45	
737-400	0.1001	0.2092				55					45	
737-500	0.2372	0.4958				55					45	
747-200	0.0007	0.0015				55					45	
747-400	0.0161	0.0337				55					45	
767-300	0.0647	0.1352				55					45	
757PW	0.3895	0.8142				55					45	
757RR	0.2067	0.4321				55					45	
767JT9	0.0054	0.0112				55					45	
MD81	0.0035	0.0061				55					45	
C-130	0.0007	0.0011				55					45	
F-18	0.0709	0.1107				55					45	
L188	0.1774	0.2767				55					45	
727EM1	0.0257					55					45	
727EM2	0.0740					55					45	
727QF	0.0160					55					45	
DC9Q7	0.0003					55					45	
DC9Q9	0.0023					55					45	
DC10-40	0.0004					55					45	
737N17	0.0075					55					45	
737QN	0.0020					55					45	
<b>TOTAL</b>	<b>260.5844</b>	<b>359.3212</b>										

Table 5  
**EXISTING AND FUTURE RUNWAY UTILIZATION PERCENTAGE**  
*Paine Field Noise Exposure Map Update*

Runway	Arrivals Day	Departures Day	Arrivals Night	Departures Night
16R	33.5	33.0	56.4	53.6
34L	27.3	27.2	43.6	46.4
16L	20.0	20.8		
34R	16.8	17.1		
11	0.9	0.6		
29	1.5	1.2		
Total	100	100	100	100

### Noise Exposure Maps

The existing and forecast aircraft operation numbers presented earlier, along with the data and methodology presented above, noise exposure maps for existing and future conditions have been prepared and are graphically depicted in the following illustrations entitled *EXISTING (2002) NOISE EXPOSURE MAP WITH EXISTING LAND USE* and *FUTURE (2008) NOISE EXPOSURE MAP WITH EXISTING LAND USE*. The 55, 60, 65, 70, and 75 DNL noise contours are illustrated on each map.

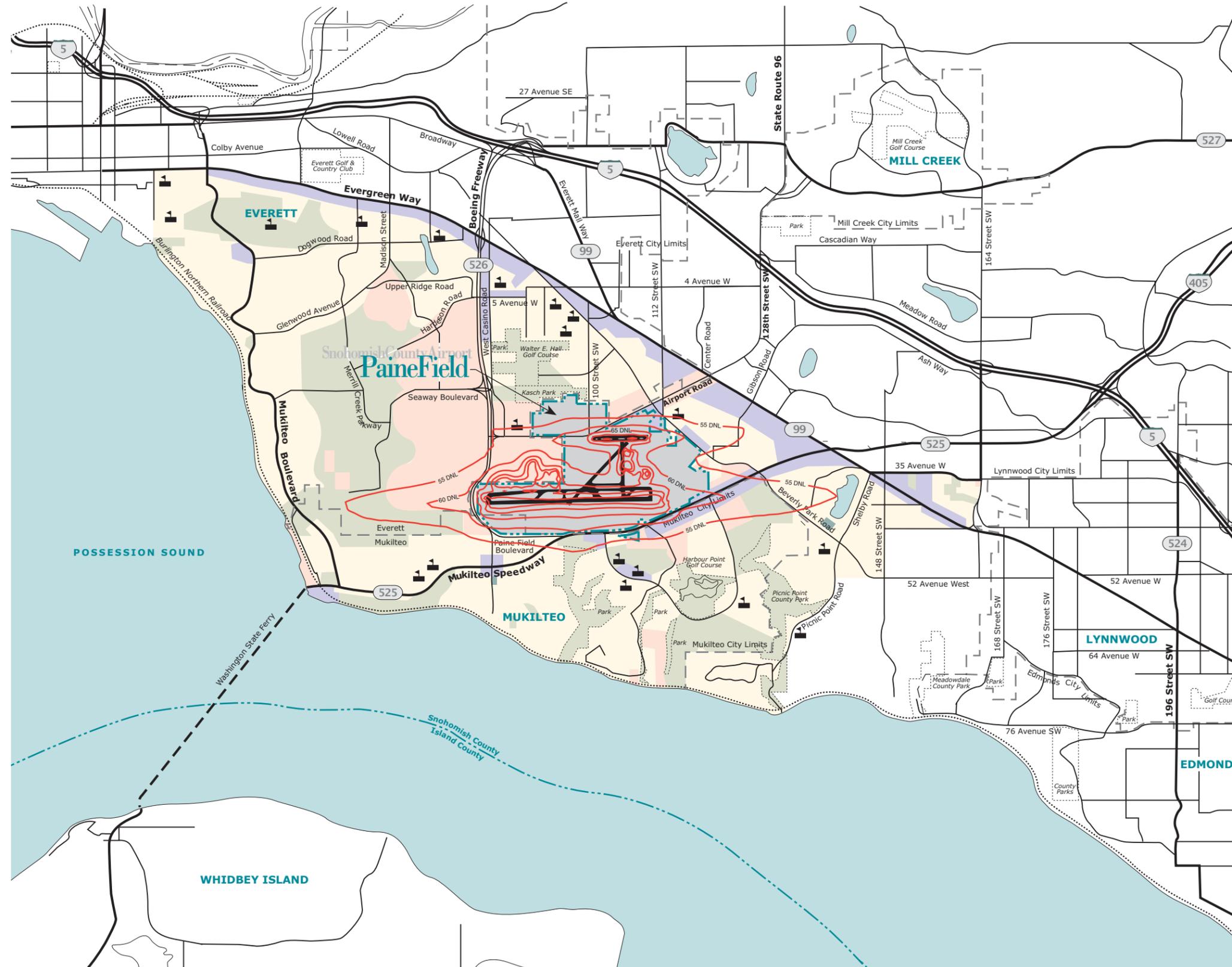


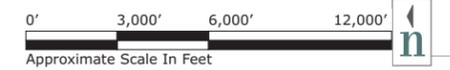
Figure 7  
Existing (2002)  
Noise Exposure Map

- Airport Property
- Residential
- Commercial
- Industrial/Office Park
- Undeveloped/Parks/Open Space
- Schools
- Outside of Study Area

The 65 DNL noise contour contains approximately 591 acres and no people.  
 The 70 DNL noise contour contains approximately 342 acres and no people.  
 The 75 DNL noise contour contains approximately 140 acres and no people.  
 Planning jurisdictions are as shown on the map.  
 Noise measurement sites and flight tracks are depicted on the Noise Measurement Sites and Flight Tracks Map.  
 Residential land use is defined as incompatible within the 65 DNL noise contour or greater by the FAR Part 150.

The Noise Exposure Map and accompanying documentation for the Noise Exposure Map for Paine Field, submitted in accordance with FAR Part 150 with the best available information, are hereby certified as true and complete to the best of my knowledge and belief. In addition, it is hereby certified that the public was afforded the opportunity to review and comment on the document and its contents.

Signed \_\_\_\_\_ Date \_\_\_\_\_



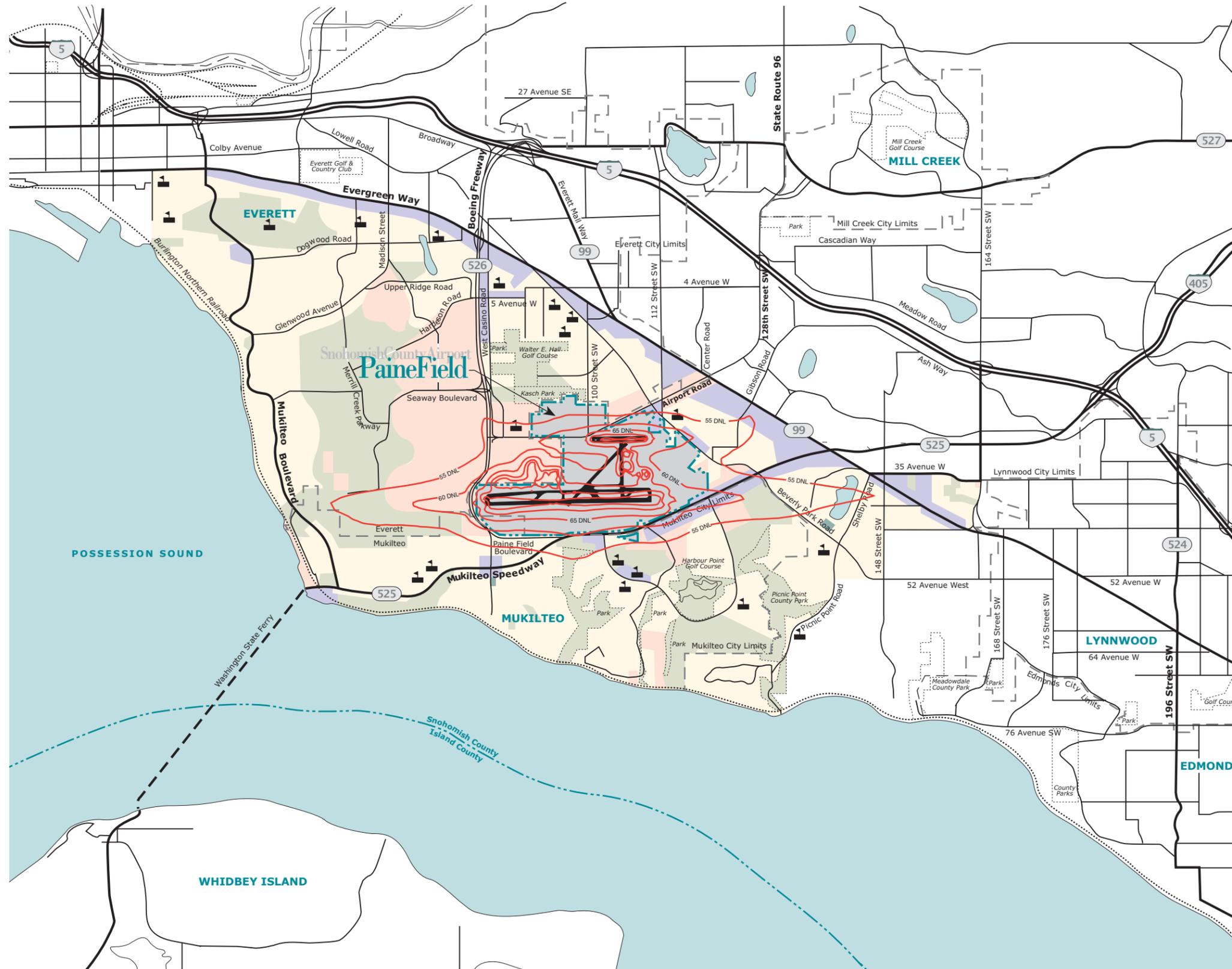
NOISE

EXPOSURE

MAP UPDATE

**PaineField**  
Snohomish County Airport

Figure 8  
Future (2008) Noise Exposure Map  
Existing Land Use

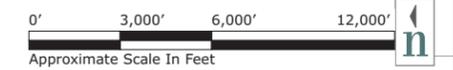


- Airport Property
- Residential
- Commercial
- Industrial/Office Park
- Undeveloped/Parks/Open Space
- Schools
- Outside of Study Area

The 65 DNL noise contour contains approximately 644 acres and no people.  
 The 70 DNL noise contour contains approximately 364 acres and no people.  
 The 75 DNL noise contour contains approximately 147 acres and no people.  
 Planning jurisdictions are as shown on the map.  
 Noise measurement sites and flight tracks are depicted on the Noise Measurement Sites and Flight Tracks Map.  
 Residential land use is defined as incompatible within the 65 DNL noise contour or greater by the FAR Part 150.

The Noise Exposure Map and accompanying documentation for the Noise Exposure Map for Paine Field, submitted in accordance with FAR Part 150 with the best available information, are hereby certified as true and complete to the best of my knowledge and belief. In addition, it is hereby certified that the public was afforded the opportunity to review and comment on the document and its contents.

Signed \_\_\_\_\_ Date \_\_\_\_\_



NOISE

EXPOSURE

MAP UPDATE

**PaineField**  
Snohomish County Airport

## Land Use Within Contours

**Existing Noise Exposure Map.** The existing Noise Exposure Map contours encompass various land uses. The Federal Aviation Administration considers residential and other noise sensitive land uses within the 65 or greater DNL contours as being incompatible. The 75 DNL noise contour is the smallest contour and the 55 DNL noise contour is the largest contour generated. The existing 75 DNL noise contour contains approximately 140 acres, all within airport/Boeing Company property. The 70 DNL noise contour contains approximately 342 acres, also all contained within airport/Boeing Company property. The 65 DNL encompasses roughly 591 acres, all of which is contained on airport/Boeing Company property. The 60 DNL noise contour contains approximately 1,130 acres, while the existing 55 DNL contour contains approximately 2,510 acres. The 60 DNL noise contour extends off of airport property to the south of both parallel runways and to the north of the main runway. The 55 DNL noise contour extends off of airport property in all directions. ***There are no residential or other noise sensitive land uses within the 65 or greater DNL noise contours associated with the Existing Noise Exposure Map.***

For comparison purposes, perhaps it is important to note that the future 65 DNL noise contour (1999) illustrated in the 1995 *Paine Field FAR Part 150* contained 832 acres and was based on a forecast of 237,700 annual aircraft operations. The actual number of aircraft operations recorded in calendar year 2000 (used as the base year in this Master Plan Update) was 213,371. The new noise contours created with INM Version 6.0c provide a more accurate depiction of noise generated at the airport by aircraft engine run-ups at Goodrich and Boeing, and better account for the effects of topography than the earlier version of the INM used in the 1995 Part 150 Study.

**Future Noise Exposure Map.** Like the Existing (2002) Noise Exposure Map, the Future (2008) Noise Exposure Map noise contours encompass various types of land uses. Again, the 75 DNL is the smallest noise contour and the 55 DNL is the largest noise contour. The future 75 DNL noise contour encompasses some 147 acres, while the 70 DNL contains approximately 364 acres, both of which are contained entirely within airport/Boeing Company property. The future 65 DNL noise contour contains approximately 644 acres, all of which is contained on airport/Boeing Company property. The future 60 DNL noise contour contains approximately 1,322 acres and extends off of airport property to the south of both parallel runways and to the north of the main runway. The 55 DNL noise contour encompasses approximately 2,889 acres and extends off of airport property to the north, south, east, and west. ***There are no residential or other noise sensitive land uses within the 65 or greater DNL noise contours associated with the Future Noise Exposure Map.*** It should be noted that reference to Table 1 from the Part 150 was used to identify land use compatibility issues for the existing and future conditions.

## **Consultation**

### **Introduction**

The development of the Paine Field Master Plan Update involved an extensive public participation process. As stated previously, the need to update the noise exposure maps was identified as a result of the public meetings and process used in the preparation of the 2002 Master Plan Update. An inclusive tone was set by Snohomish County from the very beginning by establishing a 25-member Study Advisory Committee membership that was broadly representative of all stakeholders.

The elements of the public involvement process were:

- Comprehensive Public Involvement Program
- Five Study Advisory Committee Meetings
- Five Open House/Public Meetings
- Meetings with Individual Citizens
- Project Information Brochure
- Airport Website Publications
- Numerous Working Papers
- Project Workbooks
- Public Hearing

### **Study Advisory Committee**

A key component of the Master Plan Update's public involvement process was the establishment of a Study Advisory Committee. Composition of the Study Advisory Committee (SAC) was developed to include representatives from neighborhoods surrounding the Airport, business interests, and local government representatives.

All meetings of the SAC were advertised and open to the public.

### **Project Brochure**

An introductory brochure was published and made available at all public meetings that explained the purpose and process of the study, outlined the schedule and named the participants and sponsors.

### **Open Houses/Public Information Meetings**

Five Open House/Public Information Meetings were held during the Study where members of the public were able to interact directly with Airport and consulting staff on their noise related concerns. Display boards were available to present information being discussed among the SAC. At each Open House, members of the public were afforded the opportunity to have their questions answered and provide written comments. Public input from these Open Houses was influential in prioritizing issues during the Study.

The locations for the Open Houses were publicly advertised in local newspapers and announced on the Airport's Website.

### **Project Notebooks**

Notebooks were provided to each SAC members for the organization of materials that were distributed throughout the preparation process. In addition, copies of the notebook were provided to local libraries. The project materials in the library notebooks were kept up to date throughout the preparation process.

### **Website**

The airport's web site was used extensively during the preparation of the Master Plan Update to enable broad access to technical data, meeting summaries, schedules, meeting agendas and other pertinent information.

### **Working Documents/Draft Report**

A working document was prepared and presented to airport staff and the public before the Draft Report recommendations were formulated. In addition, the Draft Report's recommendations were presented to and adopted by the Snohomish County Council in public hearing on December 4, 2002. At this initial public hearing a review of the process was presented and one Study Advisory Committee member eloquently requested that the County provide noise information to surrounding school districts so that adequate consideration on noise attenuating design features can be incorporated into the districts' capital improvement programs for affected school facilities. Following this adoption, at the suggestion of the FAA, the base year 2002 aircraft operational data and INM inputs were refined, which resulted in new 2002 and 2008 NEM contours and this Revised Draft Report. The Revised Draft Report has been circulated for public review to the Master Plan Update Study Advisory Committee members and the public through local public libraries and the Airport's webpage.

### **Public Hearing**

As stated above the Revised Draft Report was circulated to the public through the Study Advisory Committee, as well as the public libraries, the airport's webpage, and in the

airport administrative office. Notice of the public hearing was distributed with each copy of the Revised Draft Report, on the airport's webpage, along with being published in the following newspapers (see proof of publication in the Appendix):

- Seattle Times
- Mukilteo Beacon
- Everett Herald
- Mukilteo Tribune

The public hearing was held on June 30, 2003 at the Public Works Transportation Committee meeting of the Snohomish County Council. Airport staff briefed the committee. One written comment (see appendix) and no verbal comments were received. The County Council continued the Public Hearing to its legislative session on July 1, 2003. No further comments were received during the July 1 hearing and the County Council adopted the Noise Exposure Maps with the attached motion (see appendix).

## **Appendix**

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**ARMY RECORDS WRONG, MAYORAL CANDIDATE SAYS**

CONTINUED FROM PREVIOUS PAGE

tificate of award or general order, those documents would have to be corroborated by Army records, unit logs and witnesses.

The Army's criteria for awarding a Purple Heart say in part that "the wound for which the award is made must have required treatment by a medical officer and records of medical treatment for wounds or injuries must have been made as a matter of official record."

Day said he was treated at the landing zone by a medic and did not require further medical attention.

Woody Woodruff, a senior service officer of the Snohomish County Veterans Assistance Fund and a former state president of the

yourself to the highest level of accountability," he said.

Day's military record, obtained through the federal Freedom of Information Act, does list other awards for wartime service.

He received a National Defense Service Medal and a Vietnam Service Medal, given to all military personnel involved in Vietnam military campaigns.

Day also received a Gallantry Cross Unit Citation Badge, awarded by the South Vietnamese government to all members of his unit.

Day, who is challenging Mayor Gary Haakenson in this fall's election, has never run for office or served on a city commission. He said he had been

Day, a California native, moved to Edmonds two years ago, after living in Seattle for about eight years.

He describes himself as a political independent in the mold of former Minnesota Gov. Jesse Ventura.

The conversations among regulars at his downtown Edmonds coffee shop, Billy's Cubby Hole, tend to echo conservative talk radio with its anti-tax and anti-government themes.

Day said he decided to run for mayor because so many of the concerns voiced by his customers weren't being heard at City Hall.

Through June 16, Day has raised \$358 for his campaign, according to the state Public Disclosure Commission. Haakenson, a former businessman who is seeking

**NOTICE**

**A PUBLIC HEARING WILL BE HELD AT 3:00 PM ON TUESDAY JULY 1, 2003 ON THE ADOPTION OF NEW PART 150 NOISE EXPOSURE MAPS FOR PAINE FIELD.**

The Hearing will be held by the **Snohomish County Council**, in the **Jackson Board room on the 6th floor of the County Administration building at 3000 Rockefeller Ave in downtown Everett**, as they consider adopting the new 2002 and 2008 noise maps as the "Official Noise Exposure Maps" for Paine Field. Public participation is encouraged. The Part 150 Revised Draft Report is available for review in local public libraries, at the airport office and on the web at [paineinfo.com](http://paineinfo.com).

P204

**For more information please contact Bill Dolan at 425 353-2110 extension 2228**

# NOTICE

A PUBLIC HEARING WILL BE HELD AT 9:30 AM ON TUESDAY,  
JULY 1, 2003 ON THE ADOPTION OF NEW PART 150  
NOISE EXPOSURE MAPS FOR PAINE FIELD.

The Hearing will be held by the Snohomish County Council, in the Jackson Board room on the 6<sup>th</sup> floor of the County Administration building at 3000 Rockefeller Ave in downtown Everett, as they consider adopting the new 2002 and 2008 noise maps as the "Official Noise Exposure Maps" for Paine Field. Public participation is encouraged. The Part 150 Revised Draft Report is available for review in local public libraries, at the airport office and on the web at [painefield.com](http://painefield.com).

For more information please contact Bill Dolan at 425 353-2110 extension 2228

*Mukitico Beacon 6/25/03*

# NOTICE

Public Hearing on The Adoption of the  
New Part 150 Noise Exposure Maps for Paine Field  
Tuesday July 1, 2003 3:00 AM

The Hearing will be held by the Snohomish County Council, in the Jackson Board room on the 6<sup>th</sup> floor of the County Administration building at 3000 Rockefeller Ave in downtown Everett, as they consider adopting the new 2002 and 2008 noise maps as the "Official Noise Exposure Maps" for Paine Field. Public participation is encouraged. The part 150 Revised Draft Report is available for review in local public libraries, at the airport office and on the web at [painefield.com](http://painefield.com).

For more information please contact Bill Dolan 425-353-2110 ext 2228

*Tribune 6/25/03*

would start this fall.

**New neighborhood parks:** City officials recently received proposals from architects and are in the process of choosing one for the two new neighborhood parks.

One is planned at 60th Avenue W. and 186th Street SW. The other is located in the 7500 block of 33rd Place W. One or both are planned to be budgeted for 2003.

They will be smaller, but similar to the new Meadowdale park

at 168th Street SW.

**Heritage Park:** A year ahead of schedule for completion, Larsen said, and will be ready in October.

Contractors are framing the shelter that will house the historic alley, and the historic Wicker building is being reframed and a new roof is being added. The Wicker's building will hold the city's information center, and the south county information center will be moved to it from 128th Street SW in Everett.

## REVISED NOTICE

A PUBLIC HEARING WILL BE HELD AT 3:00 PM ON TUESDAY JULY 1, 2003 ON THE ADOPTION OF NEW PART 150 NOISE EXPOSURE MAPS FOR PAINE FIELD.

The Hearing will be held by the Snohomish County Council, in the Jackson Board room on the 6th floor of the County Administration building at 3000 Rockefeller Ave in downtown Everett, as they consider adopting the new 2002 and 2003 noise maps as the "Official Noise Exposure Maps" for Paine Field. Public participation is encouraged. The Part 150 Revised Draft Report is available for review in local public libraries, at the airport office and on the web at [paineairport.com](http://paineairport.com).

For more information please contact Bill Dolan at 425-353-2110 extension 2228

0001028389-01

### Readers:

We want to hear from you.  
Call us with your comments or suggestions.

425-339-3016

**THE DAILY Herald**

LEGAL NOTICES

Carol Howard Aguayo  
4012 173<sup>rd</sup> Pl. S.W.  
Lynnwood, WA 98037  
June 11, 2003

To: Bob Drewel, Snohomish County Executive  
Re: Paine Field Master Plan FAA requested redefinition of noise boundaries

At the May 13<sup>th</sup> meeting of the Paine Field Community Council, it was mentioned that the FAA had requested a revision of the noise boundaries of the Paine Field Master Plan to then be resubmitted to the County Council. It was mentioned that they were redesigned using the 9/11/2001 timeframe noise reportings as their base. Of course, everyone knows that there was little noise because flying was restricted. It is not a realistic baseline timeframe and is a further example of diminishing focus and responsibility of airplane noise to the community by the FAA.

With Boeing using less of its buildings in the Paine Field area, and the possibility of using even less after their June 20<sup>th</sup> decision, I find it most interesting that the effort to get this noise section passed before the Boeing decision is so "coincidentally" timed. (I also hope the Council has not committed any funding to the National Flight Interpretative Center until Boeing's decision has been made to stay in this area, or we will be paying for empty buildings, unless, of course, they will be part of some airline's future terminal!)

I was told by the previous Paine Field director that the Paine Field Community area would not be impacted by thoughts of a regional airport as long as Boeing was using the runways at Paine Field, Seattle, and Renton, but if they were to every leave (someone has been doing their 20 year planning-probably the same ones who added the 1979 revision "commuter service" to the mediated agreement!) then possibilities of Paine Field as a regional airport would increase. We seem to be on the "(H) horizon" of that moment.

As this noise piece of the Paine Field Master Plan is quietly slipped into the document, I once again call on the County Council to be proactive with their dealings with all the factors that can reduce the impact of noise and air pollution to the surrounding communities in Snohomish Co.

I have enclosed two recent articles, May 9<sup>th</sup>, 2003 Enterprise Business Showcase about Paine Field (interestingly split into three sections on three different pages toward the back of the paper), and a May 21, 2003, Seattle Times article on noise impact to community health. As you may remember the DNL dilutes airplane noise as a single event by mixing it with other noises of the community. I firmly believe that those of us living in the flight paths of Paine Field will most definitely notice the impact of a regular take-off and departure schedule of an increasing active Paine Field. Learn from the lessons of SEA/TAC and be proactive for this county. Though you may have retired before Snohomish County feels all the negative impacts to which I refer, it will be your names that will be remembered as the ones who had the opportunity to inform and guide the County into the healthiest legislation possible, and we look to you to do that.

I request that this letter and these articles be submitted as part of public record.

Sincerely,

*Carol Howard Aguayo*

Carol Howard Aguayo

**RECEIVED**  
SNOHOMISH COUNTY  
EXECUTIVE OFFICE

JUN 11 2003

# SNOHOMISH COUNTY AIRPORT

Snohomish County Airport (Paine Field) was originally constructed in 1936 as a Works Progress Administration (WPA) project to create new jobs and become a "super airport". While the "super airport" status was never realized, the Airport has evolved into one of the busiest general aviation, industrial, and reliever airports in the Puget Sound region. Although there is currently no commercial passenger air service at Paine Field, the Airport Master Plan documents the potential

To next page

## 2003 Business Showcase

market for future commuter or regional service. There are currently over 500 based aircraft and 200,000 airfield operations a year. These figures are projected to increase.

Major Paine Field tenants include the Boeing Company and Goodrich; but, there are also over fifty smaller firms on the airport. Two flight schools offer flight instruction from Private Pilot up through Instructor, Instrument, Multi-engine and Commercial ratings. The Everett Community College has an Aviation Maintenance Technical School at Paine that provides training for future aviation technicians. The Museum of Flight operates its

restoration center on the field, offering free tours Tuesday through Saturday.

Paine Field has over 200 acres of undeveloped land and supports economic development by providing facilities for commercial and industrial uses. Current projects at the Airport include: Construction of 70 new hangars for small and midsize general aviation aircraft. The Airport currently has a three-year waiting list for this type hangar.

The Federal Aviation Administration (FAA) is finishing up on a new \$8M, 192-foot control tower that is due to open in October of this year.

The newest entrepreneurial

## 2003 Business Showcase

visitors coming from outside Snohomish County and 60 percent from outside the U.S., an indication of how appealing the proposed new facility should be with the Boeing Tour Center and NFIC museum being co-located. The proposed National Flight Interpretative Center is projected to become a major tourist destination in Snohomish County by potentially increasing the annual number of county visitors by 100,000 and annual county tourism revenues by \$3.5m.

endeavor being considered at Paine is an aviation museum and tour center presently referred to as the National Flight Interpretative Center (NFIC). The NFIC would be a Public Facilities District project proposed for development and ownership by Snohomish County.

The proposed new facility would house an aviation museum, conference center, gift store and educational space. The Boeing Company would relocate and operate their Boeing Tour Center in the proposed NFIC facility. The Museum of Flight in Seattle has been selected as operator of the museum portion of the proposed NFIC.

Among the attractions projected to

be offered at the proposed new NFIC are:

- Aircraft and aviation history displays.
- An education center for students.
- A restaurant, gift shop, meeting rooms and a theater.

- Views of runway flight activity at Paine Field just as the Museum of Flight offers at Boeing Field.

- Tours of the Boeing 747/767/777 assembly plant from the center.
- Possible future construction of an adjoining 125-room hotel.

The Boeing Tour Center has historically been shown to be one of the most popular tourist attractions in Washington, with 75 percent of the

PERSONAL HEALTH AND WELL-BEING |

# Noise annoys

— and that's not all

**Mid-volume sound** | Sure, high decibels are bad for the ears. But the stress caused by the hum of everyday life can harm many other aspects of our physical and emotional well-being.

BY CAROL M. OSTROM  
Seattle Times staff reporter

Ah, the halcyon days of just-about-summer in Seattle. The air is warm and fragrant, and you're dying to send some of that stuff through your stale, winter-weary home.

You throw open your windows. The warm air rushes in, bringing the heady scents of lilac and mock orange.

And ... noise.  
The dull roar of traffic, punctuated by the distinctive blats of Harley's and rumbles of muscle cars. The window-cutting vibration from the plane overhead. The rock music played by the guy across the street, who — like you — has thrown open his windows.

The big dog next door: Wool-wool-wool-wool-wool ... WOOF!

Very likely, researchers say, if somebody were to sleep some monitors on you, they'd find your blood pressure up, breath coming a little faster, stomach starting to get a bit balky. They'd probably find you were having trouble concentrating, maybe even getting crabby.

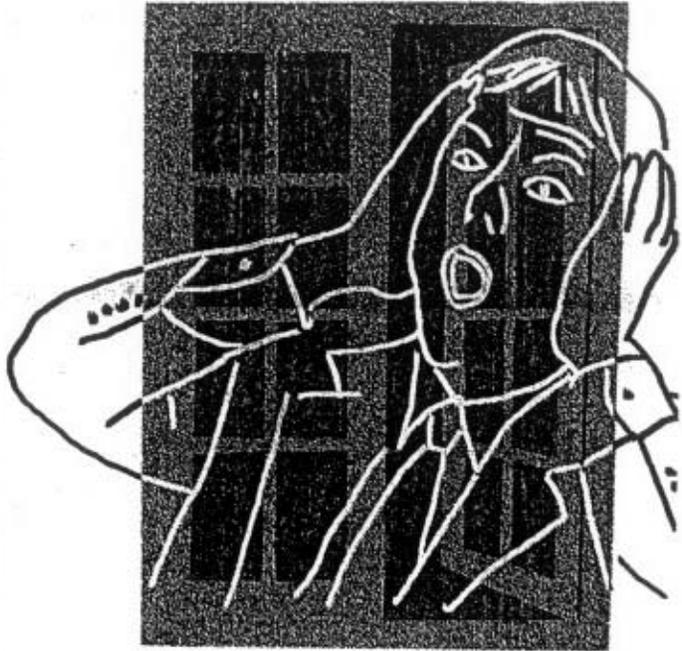
Everybody knows that Big Noise can permanently hurt your hearing. An epidemic of baby boomers with hearing damage — including former President Clinton — has reinforced warnings about ear-blasting rock concerts, close-by fireworks, gunfire and even saxophones. Even common noises at 85 decibels, a measurement of sound somewhere between the typical alarm clock and a lawn mower, can damage ears if they bang around long enough.

But what about that low-level noise? Dishwashers, traffic, music, vacuum cleaners, air conditioners, airplanes?

While such noise may not damage your hearing, researchers are finding that your body reacts to it in the same ways it does to other types of stress. Unwanted sound, says Cornell University noise researcher Gary Evans, "puts demands on you, and you try to cope with that — but some of the things you do to cope aren't very healthy."

Noise, says the American Speech-Language-Hearing Association, can elevate blood pressure, cause fatigue, reduce sleep, increase frustration and anxiety, disturb digestion and impair concentration.

The World Health Organization, which also has studied "community noise," concluded these effects can lead to reduced productivity and ability to learn, absenteeism, accidents, "annoyance responses" and



TRACY FORTER / THE SEATTLE TIMES

even increased drug use.

A study of workplace noise published in the *Journal of Occupational Health Psychology* last year found that job complexity, coupled with exposure to chronic noise, may cause blood pressure to rise and could lead to greater risk of cardiovascular disease. A Swedish study found people living in the highest-noise zones near airports were much more likely to have high blood pressure than those who lived farther away.

One study — a staged incident with someone getting out of a car and accidentally dropping an object — also found passers-by less likely to help when a nearby lawnmower was running, Evans notes.

Researchers have found that hearing improves during times of stress. But that super-alert state can make us even more susceptible to noise.

decibels	
Painful 140	firearms, air-raid siren
130	jackhammer
120	jet-plane takeoff
Extremely loud 110	rock music
100	snowmobile, chain saw
90	lawnmower
80	alarm clock
70	busy traffic, vacuum
60	dishwasher
Moderate 50	moderate rainfall
40	quiet room
Faint 30	whisper

Source: American Speech-Language Hearing Association

www.seattletimes.com/northwestlife

The Seattle Times

NORTHWESTLIFE | HEALTH

WEDNESDAY, MAY 21, 2003 | F

# Noise can make students lag and elevate stress hormones

## NOISE

CONTINUED FROM F 1

Some of noise's effects on the body involve age-old "fight-or-flight" mechanisms which cause your body to pump out stress hormones, constrict your blood vessels and, in other ways, prepare you to fight or get away.

And if you can't? Evans and other researchers say being repeatedly annoyed by something you can't do anything about brings about "learned helplessness syndrome," in which motivation diminishes. For example: When researchers asked test subjects to solve a puzzle, they found people in noisy environments gave up sooner.

For children, noise that's loud enough to interfere with hearing words can have even more serious effects. Like adults, they can "get used to" noise. But to cope, they ignore not only the noise, but speech, which leads to problems learning to read, says Evans, an environmental psychologist.

Julie Bronzaft, a New York psychologist and noise researcher who consults for many anti-noise groups, found children in classrooms facing a noisy elevated train track, by the sixth grade, had fallen behind in learning by as much as a year, compared with kids in classes on the quiet side of the building.

Even when people say they're not being annoyed, their bodies can be experiencing detrimental changes, Evans said. Blood tests on workers in noisy offices found elevated stress hormones such as cortisol and epinephrine, even when they said they weren't bothered by the noise.

"You can get used to noise, and after a while it doesn't bother you too much," he said. "But you pay a heavy price for getting used to it, because it's something that does place demands on your system. You can figure out strategies to cope with it, but there is no free lunch."

Bronzaft says even people who claim to sleep through noise may experience its effects. "They often get knocked out of the cycles of sleep," she says. "They may not realize they're reacting to it, but they are. There's always a toll."

### Noise sources

But wait, just say you make noise, too. And you like your noise. When you're alone in your car, you crank up the music, and even belt out a harmony line. You like a boisterous party just as much as the next person. And you're excited about building a deck onto your home, a project you'll work on after you come home from work.

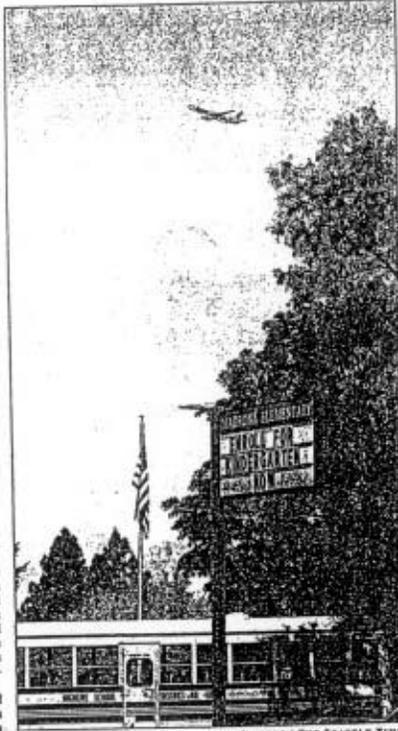
One person's noise, it seems, is another person's lullaby. Is the staccato roar of a gas lawn mower early on Saturday morning a rude noise that awakens you groggy and tired from a sound sleep? Or is it an evocative drone that sends you back to sleep, drowsing off lazy afternoons in a hammock?

One of the definitions of noise, says Curt Horner, longtime noise expert with the Seattle-King County health department, is that it isn't yours to control.

Many sources of noise — construction, airplanes and traffic — appear to be out of your control. And political solutions, these days, seem less likely. Since 1993, says Horner, the city-county health department's noise program hasn't been funded, although laws exist regulating noise both in Seattle and King County. In Seattle, police respond to some complaints, and the Department of Construction and Land Use (DCLU) to others (see "To file a noise complaint" on this page).

David George, a noise coordinator with DCLU, says Seattle's topography makes it very hard to mitigate noise. Its geographic boundaries prompt dense development and intense traffic, its many bodies of water reflect sound, and homes on hills are bombarded by commercial and industrial noise from below. Residents repeatedly exposed to construction noise express high levels of frustration, he says. "This last five years, people are going insane, because it never stops. It's legal, but it's nonstop."

Around Puget Sound, as in many communities, battles between airports and homeowners or



Madrona Elementary in SeaTac is among schools benefiting from a noise-mitigation agreement between the Highline School District, the Port of Seattle, the Federal Aviation Administration and the state.

### To file a noise complaint

Construction, mechanical equipment, commercial facility noise: Department of Design, Construction and Land Use (DCLU) noise coordinators at 206-684-7843 or [www.cityofseattle.net/dclu/noise](http://www.cityofseattle.net/dclu/noise).

Public nuisance noise, such as dogs, fowl, other animals, horns or sirens, music, amplified sound, motor vehicles or watercraft: Seattle Police Department's nonemergency number at 206-425-5000.

Aviation Noise: Noise from aircraft and helicopters in flight is controlled by the Federal Aviation Administration (FAA). However, local airports have responsibility for collecting information on noise complaints and notifying the operators.

- Sea-Tac International Airport: 206-433-0393.
- King County International Airport (Boeing Field): 206-205-5242.
- Renton Municipal Airport: 425-430-7471.

If you don't know which noise hotline number to use, and for airplanes, call the FAA noise complaint line at 425-227-1389.

If the noise complaint concerns noise emanating from ground operations of an aircraft at Boeing Field, or at a seaplane base or heliport within the Seattle city limits, you may file a complaint with DCLU by calling a Noise Abatement coordinator at 206-684-7843.

SOURCE: CITY OF SEATTLE

school districts can take decades to resolve. After a quarter-century of negotiations, the Port of Seattle, the state and the Federal Aviation Administration agreed a couple of years ago to pay for noise mitigation in 15 schools, including 10 elementary schools. The first, Madrona Elementary in SeaTac, will re-open in 2004, said Highline School District spokeswoman Catherine Carbone Rogers.

Restaurants have become a new battlefield in the noise wars. Seattle Times restaurant critic Nancy Leson, after hearing from many readers, said she'd been forced to "lower the whistle" on clamor. Now, she evaluates restaurants' noise along with their food and service.

At the San Francisco Chronicle, restaurant critics carry meters that measure decibels. Noise ratings have gotten "tremendous feedback," says executive food and wine editor Michael Bauer. In his recent "top 100" list, he said, about 75 percent were rated "four bells" — environments in which people must raise their voices to talk.

Many would-be diners tell him they avoid patronizing such noisy places, he noted.

### Psychological effects

Most people don't have to go out to find noise, unfortunately.

The U.S. Census Bureau, after an American Housing Survey of more than 106 million households in 2001, reported that noise was the No. 1 neighborhood complaint — more worrisome than neighborhood crime.

Sometimes noise contributes to that neighborhood crime: "Noise" and "shooting deaths" too often link in reports. For example: In New York City's Brooklyn Borough last month, a 65-year-old

### Coming Sunday

Shaking the salt habit is nearly impossible if you eat out much or consume a lot of processed foods. Northwest Life

### Nipping noise

If you're concerned about environmental noise, here are some suggestions from Noise Free America:

- Don't use leaf blowers, and don't hire gardeners who do.
- Don't use car alarms or keyless entry systems if they annoy neighbors.
- Keep your car's muffler and exhaust system in good shape.
- Use your horns only in emergencies.
- Position your TV and stereo so that sound stays inside your home. Consider using headphones.
- Train your dog not to bark; never leave it alone in the yard.
- Warn your neighbors if you're going to make unavoidable noise.
- Turn down your telephone ringer.
- Keep your cellphone on vibrate.
- Think about noise levels when you buy new appliances, especially vacuum cleaners and air conditioners.
- If you own a restaurant or store, monitor noise levels.
- If your home is being renovated, insist on quiet before 8 a.m.
- If someone lodges a noise complaint against you, treat it seriously and respectfully.

### On the Web

For more information on the health effects of noise:

- Noise Free America: [www.noisefree.org](http://www.noisefree.org)
- League for the Hard of Hearing: [www.lhh.org/noise/index.htm](http://www.lhh.org/noise/index.htm)
- City of Seattle noise page: [www.cityofseattle.net/dclu/noise](http://www.cityofseattle.net/dclu/noise)

who had complained about foot stomping and loud music from the apartment overhead was charged in the shooting deaths of the neighbor and his friend.

Noise was by far the most frequent complaint to a new New York City "311" nonemergency city response line set up in March, noted Bronzaft, who sits on the

mayor's council on the environment. Out of a total of 47,639 complaints over six weeks, more than 20,000 concerned noise.

A Seattle City Council staff report in 1999 put noise complaints at about 12,000 per year, up considerably from previous years.

"Noise psychologically drives people mad," said Bronzaft, who is

often called in to help mediate noise complaints. Before she can help solve their problems, she said, "I have to calm the person down. ... That's how anguished they are. As a psychologist, I just know what it does to your head. Most people just can't take it."

Evans and other researchers say much more research is needed on specific health effects of noise, particularly on the effects over time. "The U.S. is so far behind," says Evans. "Almost all of the really good research that's being done is in Europe and now Japan." Controversial but intriguing findings that need more work include those showing noise may affect placental physiology, newborn birth weight and early development.

Some noise problems already have technical solutions: infrared headphones for television, better sound insulation in construction, quieter plants and tools. "It's not the know-how that's missing," says Bronzaft. "It's the will. We haven't attended to this."

For now, as with many health issues, these researchers say the place to start is with yourself.

Assume your happy sounds are "noise" in the ears of your neighbors and act accordingly. Horner advises. "Noise is the greatest stressor in American urban life, and even sometimes suburban life," he says. "If everyone were courteous to their neighbors, we wouldn't have a noise problem."

Carol M. O'Connell, 206-444-2249 or [carolm@seattletimes.com](mailto:carolm@seattletimes.com)

Note: Paine Field left-out

**Snohomish County****County Executive's Office**

**Robert J. Drewel**  
*County Executive*

June 16, 2003

Carol Howard Aguayo  
4012 173<sup>rd</sup> Pl. SW  
Lynnwood WA 98037

M/S #407  
3000 Rockefeller Avenue  
Everett, WA 98201  
(425) 388-3460  
FAX (425) 388-3434  
TTY/TDD (425) 388-3700  
county.executive@co.snohomish.wa.us  
www.co.snohomish.wa.us

Dear Ms. Howard Aguayo:

Thank you for writing to County Executive Bob Drewel regarding Paine Field. He has asked me to respond on his behalf. We appreciate your understanding of the many opportunities that exist at Paine Field, including the National Flight Interpretive Center and possible Boeing tour center.

Paine Field does have an exciting future that will entail changes. As in the past, however, we are committed to working in an open and public manner with the Paine Field Community Council and neighbors and communities adjacent to Paine Field to minimize the impacts that changes could have. I am aware of the significant problems, especially noise, that have been a battleground for other airports and their neighbors. Changes in technology and a long history of positive interaction between Paine Field and surrounding communities give me hope that we can work constructively in the future.

Please stay actively engaged in this important issue. We need engaged citizens to make balanced and informed decisions.

Sincerely,

Stephen L. Holt  
Executive Director

cc: Dave Waggoner, Airport Director

*June 2003*

**P204**

*My copy  
one to Bill D.,  
one to  
Dumplingsburg*

SNOHOMISH COUNTY COUNCIL  
SNOHOMISH COUNTY, WASHINGTON

MOTION NO. 03-316

A MOTION ADOPTING THE PAINE FIELD AIRPORT PART 150 NOISE  
EXPOSURE MAPS

WHEREAS, the County Council adopted a Part 150 Noise Compatibility Plan, including Noise Exposure Maps, for the Snohomish County Airport at Paine Field pursuant to Motion No. 95-220 in July 1995, and

WHEREAS, the County Council adopted new forecasts of aviation activity at Paine Field as part of the Airport Master Plan update study by Motion No. 01-255 on July 25, 2001, and

WHEREAS, the Noise Exposure Maps are required to be updated pursuant to CFR 14 Part 150 and the County Council adopted new Noise Exposure Maps on December 4, 2002, subject to FAA approval, and

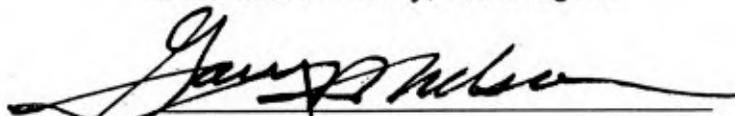
WHEREAS, the FAA has requested revisions in the Noise Exposure Maps database and the proposed Noise Exposure Maps are based on the new forecast and reflect the database revisions requested by FAA, and

WHEREAS, the County Executive and Airport staff recommend adoption of the new Part 150 Noise Exposure Maps

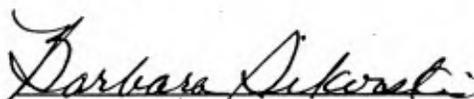
NOW THEREFORE ON MOTION: the Snohomish County Council adopts the new Part 150 Noise Exposure Maps dated June 2003 for Paine Field as the official Airport Noise Exposure Maps.

DATED this 2nd day of July 2003.

SNOHOMISH COUNTY COUNCIL  
Snohomish County, Washington

  
Chairperson

ATTEST:

  
Asst. Clerk of the Council

**RECEIVED**

JAN 16 2004

U.S. Department  
of Transportation **BY SNOHOMISH COUNTY AIRPORT****Federal Aviation  
Administration****Northwest Mountain Region**  
Colorado, Idaho, Montana  
Oregon, Utah, Washington,  
Wyoming1601 Lind Avenue, S. W.  
Renton, Washington 98055

January 8, 2004

Mr. Dave Waggoner, Airport Director  
Paine Field/Snohomish County Airport  
3220 100<sup>th</sup> Street S.W.  
Everett, Washington 98204-1390

Dear Mr. Waggoner:

The 2002/2003 and 2008 noise exposure maps (Figures 7 and 8) and supporting documentation you submitted to us, in accordance with Section 47503(a) of Title 49 United States Code (49 U.S.C.), have been reviewed. We have determined that your submission complies with applicable requirements of Title 14 Code of Federal Regulations, Part 150, and that the following applies:

a. The base map of the airport environs land use was prepared in consultation with public agencies and political jurisdictions within the 65 day/night noise level (DNL) contour.

b. The maps listed above are reasonably consistent with the provisions set forth in Federal Aviation Regulation (FAR) Part 150.

Our determination is limited to a finding that the maps were developed in accordance with the procedures contained in FAR Part 150. Such determination does not constitute approval of your data, information, or plans.

In addition, we will not be involved in determining the relative locations of specific properties with regard to the depicted noise contours. We will not interpret the maps to resolve questions concerning, for example, which properties should be covered by the provisions of Section 47507 of 49 U.S.C. These functions are inseparable from the ultimate land-use-control and planning responsibilities of local government.

The local responsibilities are not changed in any way under FAR Part 150, or through our determination relative to your noise exposure maps. Responsibility for the detailed overlaying of noise exposure contours onto maps that depict properties on the surface rests exclusively with you, the airport operator, or with those public agencies and planning agencies with which consultation is required under Section

47503(a)(1) of 49 U.S.C. We rely on your certification that the statutorily required consultation, under Section 150.21 of FAR Part 150, has been accomplished.

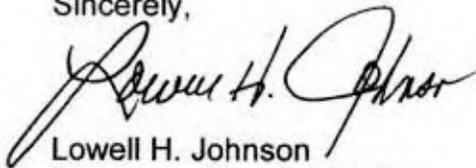
We will publish a notice in the Federal Register announcing our determination of the noise exposure maps for Paine Field/Snohomish County Airport.

To satisfy the requirements of Section 47506 of 49 U.S.C., you are required to publish a notice of our determination, and the availability of the noise exposure maps. This notice is to be published at least three times in a newspaper of general circulation in the county or counties where affected properties are located.

Also, you are required, under Section 150.21(d) of FAR Part 150, to promptly submit revisions to these maps, should there be any actual or proposed change in the operation of Paine Field/Snohomish County Airport that might create any substantial or new non-compatible use in any areas depicted on the maps.

Congratulations on your successful completion of the FAR Part 150 noise exposure maps. We look forward to our continuing relationship with you to mitigate aircraft noise impacts.

Sincerely,



Lowell H. Johnson  
Manager, Airports Division  
Northwest Mountain Region

cc:  
APP-600  
SEA-600



**NOISE EXPOSURE MAP NOTICE**

AGENCY: Federal Aviation Administration, DOT

ACTION: Notice

**SUMMARY:** The Federal Aviation Administration (FAA) announces its determination that the noise exposure maps submitted by Snohomish County for Paine Field/Snohomish County Airport under the provisions of 49 U.S.C. 47501 et. seq (Aviation Safety and Noise Abatement Act) and 14 CFR Part 150 are in compliance with applicable requirements.

**EFFECTIVE DATE:** The effective date of the FAA's determination on the noise exposure maps is January 8, 2004.

**FOR FURTHER INFORMATION CONTACT:** Dennis Ossenkop, Federal Aviation Administration, Airports Division, 1601 Lind Ave. S.W., Renton, WA, 98055-4056, telephone 425 227 2611.

**SUPPLEMENTARY INFORMATION:** This notice announces that the FAA finds that the noise exposure maps submitted for Paine Field/Snohomish County Airport are in compliance with applicable requirements of Part 150, effective January 8, 2004. Under 49 U.S.C. section 47503 of the Aviation Safety and Noise Abatement Act (hereinafter referred to as "the Act"), an airport operator may submit to the FAA noise exposure maps which meet applicable regulations and which depict non-compatible land uses as of the date of submission of such maps, a description of projected aircraft operations, and the ways in which such operations will affect such maps. The Act requires such maps to be developed in consultation with interested and affected parties in the local community, government agencies, and persons using the airport. An airport operator who has submitted noise exposure maps that are found by FAA to be in compliance with the requirements of Federal Aviation Regulations (FAR) Part 150, promulgated pursuant to the Act, may submit a noise compatibility program for FAA approval which sets forth the measures the operator has taken or proposes to take to reduce existing non-compatible uses and prevent the introduction of additional non-compatible uses.

The FAA has completed its review of the noise exposure maps and accompanying documentation submitted by Snohomish County for Paine Field/Snohomish County Airport. The documentation that constitutes the "noise exposure maps" as defined in section 150.7 of Part 150 includes the following from the September 2003, Paine Field FAR Part 150 Noise Exposure Maps Update :

- Figure 7 at page 19, Existing Noise Exposure Map, 2002/2003;
- Figure 8 at page 20 Future Noise Exposure Map, 2008;
- Figure 6 at page 12 Flight Tracks;
- Figure 5 at page 11 Noise Monitoring Sites;
- Table 1 at page 9 Summary of Aviation Forecasts 2002-2008;
- Tables 2 through 5 at pages 14-18 present flight track utilizations by runway and aircraft type
- Figure 7 at page 19, Existing 2002 Noise Exposure Map, presents estimates of the number of persons residing with the DNL 55, 60, and 65 noise contours;
- Figure 8 at page 20, Future 2008 Noise Exposure Map, presents estimates of the number of persons

- residing with the DNL 55, 60, and 65 noise contours;
- Pages 20 through 24 and the Appendix present consultation details.
- The year of submission (2003) airport operations data is equivalent to the submitted existing condition Noise Exposure Map (2002) operations data and the five-year forecast Noise Exposure Map is reasonable.
- There are no properties on or eligible for inclusion in the National Register of Historic Places within the DNL 65 contour.

The FAA has determined that these noise exposure maps and accompanying documentation are in compliance with applicable requirements. This determination is effective on January 8, 2004.

FAA's determination on an airport operator's noise exposure maps is limited to a finding that the maps were developed in accordance with the procedures contained in appendix A of FAR Part 150. Such determination does not constitute approval of the applicant's data, information or plans, or a commitment to approve a noise compatibility program or to fund the implementation of that program. If questions arise concerning the precise relationship of specific properties to noise exposure contours depicted on a noise exposure map submitted under section 47503 of the Act, it should be noted that the FAA is not involved in any way in determining the relative locations of specific properties with regard to the depicted noise contours, or in interpreting the noise exposure maps to resolve questions concerning, for example, which properties should be covered by the provisions of section 47506 of the Act. These functions are inseparable from the ultimate land use control and planning responsibilities of local government. These local responsibilities are not changed in any way under Part 150 or through FAA's review of noise exposure maps. Therefore, the responsibility for the detailed overlaying of noise exposure contours onto the map depicting properties on the surface rests exclusively with the airport operator that submitted those maps, or with those public agencies and planning agencies with which consultation is required under section 47503 of the Act. The FAA has relied on the certification by the airport operator, under section 150.21 of FAR Part 150, that the statutorily required consultation has been accomplished.

Copies of the full noise exposure map documentation and of the FAA's evaluation of the maps are available for examination at the following locations:

Federal Aviation Administration  
Airports Division, Suite 315  
1601 Lind Avenue, S.W.  
Renton, Washington  
Federal Aviation Administration  
Seattle Airports District Office  
1601 Lind Ave. S.W. Suite 250  
Renton, Washington  
Snohomish County Airport  
Office of the Airport Director  
3220 100th Street S.W.  
Everett, WA

Questions may be directed to the individual named above under the heading FOR FURTHER INFORMATION CONTACT. Issued in Renton, Washington, January 8, 2004  
Original Signed by

Lowell H. Johnson, Manager  
Airports Division  
Northwest Mountain Region  
Published: January 24, 25, 26, 2004.

-----Original Message-----

From: Sheri.Kasen@faa.gov [mailto:Sheri.Kasen@faa.gov]  
Sent: Tuesday, September 16, 2003 11:23 AM  
To: Cayla.Morgan@faa.gov; Dolan, Bill  
Subject: Paine Field Part 150 estimate

Cayla-

I just wanted you to know that I have reviewed the forecasts from Paine Field. Bill Dolan spent considerable time with me last week describing the process that was used to derive the forecasts. I support what Paine Field has done and I concur with their process and estimates.

If you need any further information, please let me know.

Sheri Kasen

### NOISE ABATEMENT PROCEDURES FOR ALL AIRCRAFT

Noise abatement procedures are designed to minimize exposure of residential areas to aircraft noise, while ensuring safety of flight operations. There are communities surrounding the airport which are noise sensitive. We want to minimize the noise impacts on these communities. The procedures described herein are intended for noise abatement procedures and are subject to air traffic control and pilot discretion for reasons of safety.

#### SMALL PROPELLER AIRCRAFT (Single and twin engine under 12,500 pounds)

- Avoid overflights of school sites shown on map.
- Aircraft with engines rated over 250 total horsepower are requested to use Runway 16R/34L except itinerant operations as noted below.

#### Approaches:

- Itinerant arrivals and low approaches of small aircraft over 250 horsepower are authorized on Runways 29, 16L and 34R.
- Enter Class D Airspace from the suggested reporting points as shown on the map at or above 1600' MSL.
- Runway 16R/34L, Runway 16L/34R, Runway 11/29: Remain as high as practical until intercepting the VASI, PAPI or glide slope unless directed otherwise by ATC

#### Departures:

- Itinerant departures allowed on Runways 11/29 and 34R. Itinerant departures from Runway 29 should proceed with a 50 degree north turn over 34L.
- Climb runway heading to 1100' MSL or higher before turning unless directed otherwise by ATC.
- Runway 16L/34R and Runway 11/29: Avoid intersection departures except for Runway 11 from D1.
- Maintain 1600' MSL or higher until leaving the Class D Airspace.

### JET, TURBOPROP & LARGE PROPELLER AIRCRAFT

Noise abatement procedures in effect unless directed otherwise by ATC

#### Use Runway 16R/34L:

- Touch and go operations and repetitive training flights are discourag-d.
- Runway 34L departures are discouraged in calm wind conditions.

#### Approaches:

- Standard NBAA/Aircraft Operating Manual noise abatement procedures should be used.
- Practice IFR approaches during VMC.
- Circle to land maneuvers are discouraged.
- Missed approach instructions will be assigned by ATC.

#### VFR Approaches:

- Downwind should be flown midchannel.
- Runway 16R: Make turn to final north of shoreline or 2.5 DME.
- Fly final at or above ILS glide slope, VASI or PAPI.
- Straight-In Approach: Maintain at or above 2,000' MSL until intercepting ILS glide slope, VASI or PAPI.

#### Departures (IFR or VFR):

- Intersection takeoffs are discouraged.
- Standard NBAA/Aircraft Operating Manual noise abatement procedures should be used.
- Runway 34L: Avoid turns before reaching the shoreline or at 2.5 D.
- Runway 16R: Avoid turns until reaching 3000' MSL.

#### ROTARY WING AIRCRAFT

- Military - Copies of military procedures are available from airport Operation
- Civilian - Contact Air Traffic Control for takeoff and landing procedures

#### OPERATIONS WITH ATC TOWER CLOSED

- Announce intentions on CTAF 132.95.
- Runways 11/29 and 16L/34R closed.
- Caution for converging traffic on base to final legs to Runway 16R - 34L.
  - Large aircraft fly a west pattern to 16R or 34L over the water.
  - Small aircraft fly east pattern on 16R or 34L.
- Intersection departures and repetitive training operations are discouraged.
- PPR for Air Carrier Service 2100 - 0700 local (425-771-0488 or 353-1606).

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# Response to Comment

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Dear Calvin Carnegie:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

## General Responses

- 1-1: Adequacy and Use of FAA Guidance
- 1-2: Scope of the Supplemental EA Analysis for Future Operations and Passengers
- 2-1: Why Can't the County Limit or Restrict Operations?
- 3-2: Use of the DNL Metric
- 3-3: Noise Measurements and Supplemental Metrics Requested
- 3-4: Noise Analysis Methodology
- 3-5: Where are Flight Tracks Shown?
- 3-7: Noise Impacts on Schools
- 3-9: Request For Noise Curfew/Activity Restrictions

Please also see the following individual responses.

## Aircraft Noise Assessment / Previous Part 150 Study

The noise methods used in the Draft Supplemental Environmental Assessment (EA) comply with FAA Orders 1050.1F and 5050.4B, as they relate to aircraft noise, as well as 14 Code of Federal Regulations Part 150 (14 CFR Part 150). The methodology to model noise impacts for an EA follows the same methodology that is used for Part 150 Studies.

## Washington State Noise Assessment References

While noise contours could be produced for lower sound levels; a lower threshold would not be used for mitigation purposes. FAA will not fund mitigation for sound levels below DNL 65 dB, as virtually all land uses are considered compatible with aircraft noise levels below that threshold, in accordance with FAA Order 1050.1F.

## Paine Field Master Plan

As stated above, noise contours could be produced for lower sound levels; however, this is not required by the National Environmental Policy Act (NEPA), Council on Environmental Quality regulations, or FAA Orders 1050.1F and 5050.4B, FAA's guidance for implementing NEPA.

FAA Orders and 14 CFR Part 150 require the use of a computer model to determine noise exposure. This allows calculation of noise exposure at numerous points around the airport. It also allows prediction of future exposure levels based on expected changes in aircraft activity. As a result, noise monitoring cannot be used to "calibrate" the AEDT model or influence the results of modeling. In terms of aircraft restrictions, the Airport Noise and Capacity Act of 1990 restricted the ability to restrict activity at a public use airport. Aircraft monitors could be used; however, the results would be for informational purposes only.

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**From:** Peter K <profrehab3@gmail.com>  
**Sent:** Saturday, November 3, 2018 6:24 PM  
**To:** Paine Field <paine@esassoc.com>  
**Cc:** Kent Shafer <kentshafer@gmail.com>; Denny Onslow <denny.onslow@gmail.com>; brian.sullivan@co.snohomish.wa.us  
**Subject:** Paine Field Supplemental EA/Comments.

Dear Environmental Science Associates,

I attended your public hearing at the Lynnwood Convention Center last Monday regarding the Paine Field Supplemental EA, and wanted to provide some comments that I hope you will consider.

I find your study lacking for the following reasons:

1. The study area is limited to the immediate Paine Field footprint. It doesn't account for the environmental impacts for all of the areas impacted by commercial air traffic in Snohomish and Island Counties.
2. You give the Paine Field proposal an 'all clear' based upon your environmental assessment of a minimal amount of flights proposed - 24 flights/48 take offs and landings. Your study doesn't take into consideration that there is no cap to the number of flights. It's likely then that flights will increase dramatically in the next five years, as will the related environmental impacts to the surrounding communities.
3. As I understand it, the decibel levels measured were only at Paine Field itself, with an average of 65 decibels reported. That is too loud for the surrounding communities. This doesn't account for higher decibels spikes in noise exceeding that average in and around Paine Field. Bottom line, the noise pollution in the surrounding communities is going to increase substantially.
4. Your study doesn't address water quality issues, encroachment on general aviation facilities, impacts on wildlife/threatened species, or how emergency fuel dumps will affect the surrounding areas.
5. Your study is woefully inadequate when it comes to surface traffic, failing to factor in realtime traffic congestion along the main arterials to Paine Field; I-5, Mukilteo Speedway, HWY 525, and HWY 99. Air passengers hoping for a shorter commute to Paine Field will instead find themselves stuck in gridlock at peak times on these arterials, unless there are major roadway improvements.
6. It also fails to address the impact of home values in the flight paths, and does not address the cost of roadway repairs due to projected increased traffic.
7. Finally, it is unclear why a more comprehensive study such as a full Environmental Impact Study was not completed for a proposal that will so dramatically change our region?

For these reason I strongly object to your study. I ask that a more complete study be undertaken with greater public input. I request that a more comprehensive and thorough environmental evaluation be conducted that measures the true impacts that commercial air traffic will have on our region.

Thanks for your consideration,

Peter Knowles  
Edmonds, WA ([profrehab3@gmail.com](mailto:profrehab3@gmail.com)).

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## Response to Comment

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Dear Peter Knowles:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### General Responses

- 1-1: Adequacy and Use of FAA Guidance
  - 1-2: Scope of the Supplemental EA Analysis for Future Operations and Passengers
  - 1-3: Flawed/Inadequate Supplemental EA
  - 1-7: Study Areas
  - 2-3: What are the Effects of the Proposed Project on General Aviation?
  - 2-5: Would there be an Increase in Fuel Dump/Fuel Smell/Residue?
  - 3-2: Use of the DNL Metric
  - 3-4: Noise Analysis Methodology
  - 3-6: What Are the Existing and Future Noise Impacts?
  - 5-1: Existing and Future Traffic
  - 5-2: Traffic Analysis
  - 6-2: What is the Impact on Property Values?
  - 6-5: What is the Impact on Wildlife?
  - 6-8: Cumulative Impacts
- 
-

**From:** Dan and Donna McKinnon <mddonna@msn.com>  
**Sent:** Saturday, November 3, 2018 2:09 AM  
**To:** Paine Field <paine@esassoc.com>  
**Subject:** Alaska airlines increasing the frequency of planes.

I kept looking for a way to respond. My cousin's daughter posted on Facebook today or I wouldn't have known about it.

I've been at Starbucks on Mukilteo Speedway north of Beverley Blvd. when a plane went by. It's so big you can almost reach out and touch it, not to mention the noise. I can imagine what it will be like when the passenger planes start flying. I'm against Alaska increasing the number of flights at Paine Field.

Donna J McKinnon  
[mddonna@msn.com](mailto:mddonna@msn.com)  
206-941-6240

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## Response to Comment

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Dear Donna McKinnon:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### **General Responses**

2-4: Aircraft Currently Fly Low and Very Close to Houses

3-6: What Are the Existing and Future Noise Impacts?

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**From:** pamela lemcke <plemcke@msn.com>  
**Sent:** Saturday, November 3, 2018 3:51 AM  
**To:** Paine Field <paine@esassoc.com>  
**Subject:** Passenger Terminal at Paine Field

Hello

Let me start thus with I'm not totally against the passenger terminal. It gives me great concern however as to why a typical environmental assessment wasn't required or completed. It's a requirement of just about any other significant project in the region.

It appears no neighborhood studies were completed on the now doubled amount of flights each day

Of course these flights will affect property values and property enjoyment. I think that since Propellar stands to make considerable profit that its only fair for homeowners along the flight path be compensated financially.

My house values are alre as dy decreased. My next door neighbor had to sell his house at a \$75,000 reduction.

I'd like to know why a complete ESI wasn't completed nor required.

I'd like to know who signed off on that.

Call this a PRR if need be.

Thank you

Please remember I'm only trying to protect my 22 year old investment.

I've seen it go from only hot air balloons to now 24 flights.

Along with SeaTac planes coming this far north now.

Thank you

Pam Lemcke

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## Response to Comment

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Dear Pam Lemcke:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### **General Responses**

1-1: Adequacy and Use of FAA Guidance

1-2: Scope of the Supplemental EA Analysis for Future Operations and Passengers

1-3: Flawed/Inadequate Supplemental EA

6-1: What are the Quality of Life Impacts?

6-2: What is the Impact on Property Values?

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# **SAVE OUR COMMUNITIES**

**P.O. Box 482 Mukilteo, WA 98275**

[www.socnw.org](http://www.socnw.org)

November 2, 2018

Environmental Science Associates  
Paine Field Supplemental EA  
5309 Shilshole Avenue NW, Suite 200  
Seattle, WA 98107

In response to the comment period for the Draft Supplemental Environmental Assessment for Snohomish County Airport/Paine Field, please find our comments and requests enclosed. We ask for a detailed response to our comments and questions and to our requests for additional action. Additionally, we request you extend the comment period at least 30 days.

Save Our Communities (SOC) is a non-profit organization of concerned citizens from communities throughout Snohomish, Island, and northern King Counties dedicated to preserving the quality of life in this primarily residential area of Puget Sound. We fully support the aerospace manufacturing and general aviation role of the airport which led to the rezoning and development of thousands of acres worth billions of dollars now.

## **Executive Summary**

This Draft Supplemental EA refers to the EA conducted in 2009 and finalized by the FAA on December 4, 2012 with Record of Decision (ROD) finalizing a Finding of No Significant Impacts (FONSI). Given the numerous references to that 2012 EA, it is appropriate and relevant to resubmit our comments on that EA. Our submission included other documents that were referenced and the entire package is attached (Attachment Two).

Part of concern then was the inappropriately limited scope of study that only considered 6.3 flights per day in year one and up to 11.5 flights per day in year 5. We argued that approach only counted on the airlines announced “planned” activity levels and did not consider past, present, and reasonably foreseeable future actions. We argued that activity levels would potentially be increased to much greater levels. It is clear that the same flawed approach is being repeated.

The 9<sup>th</sup> Circuit Court of Appeals in its decision admitted that under the National Environmental Policy Act and its implementing regulation, the FAA was required to analyze all “reasonably foreseeable” environmental impacts of its decision to open

Paine Field to commercial passenger traffic. The decision equated “impact” with “effect” and defined indirect effects as those that are “reasonably foreseeable”. The decision went on to cite a definition of “cumulative impacts” as those which result from the addition of impacts from current and past actions to those of “reasonably foreseeable” future actions.

It is therefore clear that reasonably foreseeable future actions must be considered. Yet, once again, this Supplemental EA repeats the fundamental flaw of the original EA by limiting the scope to the amount of flight activity announced by interested airlines. That is exactly the same flawed approach taken in the original EA. It is ironic that the FAA decision to conduct this expanded scope Supplemental EA actually validates our argument that the original EA was too limited in scope – an argument the FAA rejected. Exacerbating this flaw is the fact that this Supplement EA assumes that a full 5 years after startup there will be absolutely no increase in flight activity whatsoever through increased use of the two gate terminal or expansion of the terminal.

These decisions collectively provide prima facie evidence that “reasonably foreseeable” activity levels were excluded from this assessment. The FAA’s own policy (Order 1050.1F) states past, present, and reasonably foreseeable future actions must be considered in determining whether there are potential cumulative impacts. This was not done in the EA and it was not done in this Draft Supplemental EA. This FAA pattern leads to a conclusion that the FAA does not want to open the cumulative impact door as it would require additional impact and mitigation identification; this needs to change.

Primary Request: We therefore request this Draft Supplemental EA be modified to fully consider past, present, and reasonably foreseeable future actions in order to address potential cumulative impacts. If completed objectively, then we are confident that significant impacts will be identified as noise, emissions, traffic and other impacts will only be greater than what is depicted in the EA or this Draft Supplemental. Identification of significant impacts would lead to a Supplemental EA conclusion that a full EIS should be conducted. That is the part of the purpose of conducting an EA – to either determine a FONSI or recommend an EIS.

Social and Economic Impacts: We fully realize the EIS is more comprehensive and requires a more in depth assessment of potential impacts which not only includes the factors in the Draft Supplemental EA (noise, emissions, traffic, etc.) but also often include the social and economic impacts to local communities, such as impacts to available housing stock, economic impacts to businesses and property values. This would also include costs and timelines involved in mitigating expected impacts.

Impacts and Mitigation Costs: We strongly recommend that these economic impacts and all impacts be identified along with mitigation options and costs. At the public hearings for the EA and the one public hearing for this Draft Supplemental EA, you

heard this concern brought up several times and echoed through the showing of support for such statements (hands raised per the instructions of the moderator).

In order to minimize repeat comments, please read our submission in 2010 and respond to the requests articulated there as they apply to this Draft Supplemental EA – see Attachment 2.

In addition, we make comments and ask a number of questions of this Draft Supplemental EA (Attachment 1). We would expect that an EIS would address these substantial concerns by identifying all impacts, mitigation options and costs. A failure to do this represents an unacceptable social, economic, and environmental liability to the taxpayers and municipalities of Snohomish County.

Sincerely,

Save Our Communities (SOC)  
President, Officers, Board  
On behalf of SOC members

Attachment 1: Comments and Questions on Draft Supplemental EA  
Attachment 2: SOC Submission to the EA that was finalized in December 2012

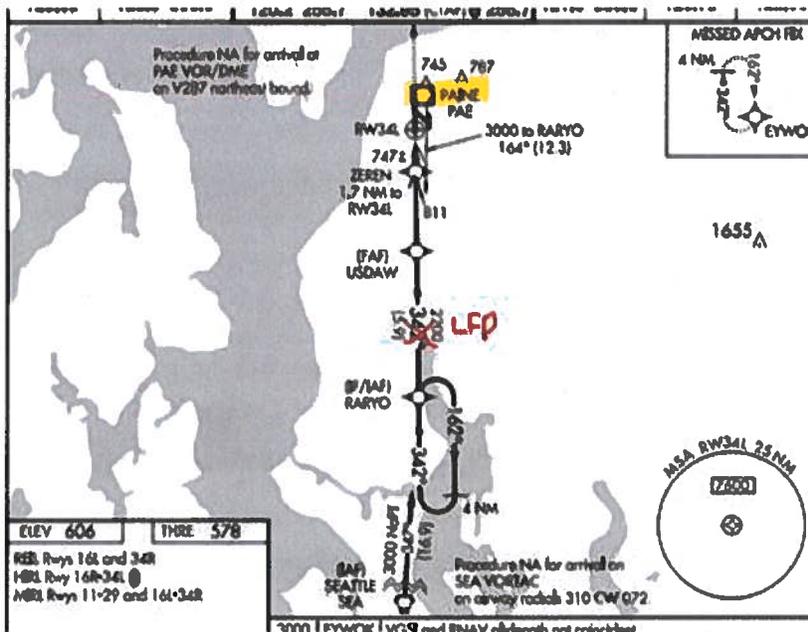
Cc:	Mayor (Mukilteo)
FAA	Mayor (Edmonds)
Snohomish County Council	Mayor (Lynnwood)
Snohomish County Executive	Mayor (Woodway)
Senator Marko Liias	Mayor (Mountlake Terrace)
Representative	Mayor (Brier)
Representative	Secretary (WSDOT)

Environmental Science Associates  
Paine Field Supplemental EA  
5309 Shilshole Ave NE  
Suite 200  
Seattle, WA 98107

To whom it may concern,

I would like to register comments regarding the Environmental Impact Statement for commercial aircraft on Paine Field.

I am a resident of Lake Forest Park and this city is 10 miles south of Paine Field directly in line with the north south runway. I estimate that planes taking off to the south will be at an altitude of 2000 feet when they reach Lake Forest Park.



My main concern is noise; a secondary concern is emissions.

A single airplane taking off to the south will affect tens of thousands of homes in this densely populated region.

The DNL (Day Night Average Sound Level) is a flawed method of measuring acoustical impact on the community. Humans and wildlife do not hear decibels as averages, they hear a sound from the point of origin at the time it was emitted. Using averages- and an average as high as 65 dB- could mean a deafening explosion could occur but averaged out would remain insignificant as far as noise criteria within the EIS is concerned. When I lived 20 miles north of SeaTac in Central Seattle, the air traffic noise was so loud, it was impossible to hear a human voice (that is, have conversation) outside during peak air traffic hours. Lake Forest Park is much closer to Paine Field than Central Seattle is to SeaTac, and is on the take off flight path, not the approach.

**P209**

I urge you to consider the impact allowing additional flights over our area will cause for our community already traumatized by the increased air traffic into SeaTac. The Lake Forest Park Comprehensive Plan includes language around mitigating air traffic: Policy EQ-6.4: "Coordinate with other agencies and local governments in monitoring aircraft noise levels and flight patterns, and in finding ways to minimize air traffic noise."

[https://www.cityofflp.com/DocumentCenter/View/2578/LFP\\_Comprehensive-Plan\\_2015\\_Vol1?bidId=](https://www.cityofflp.com/DocumentCenter/View/2578/LFP_Comprehensive-Plan_2015_Vol1?bidId=)

Property owners own 87' of the air above their homes (Supreme Court, United States vs. Causby): "If the landowner is to have full enjoyment of the land, he must have exclusive control of the immediate reaches of the enveloping atmosphere." William O. Douglas

[https://en.wikipedia.org/wiki/United\\_States\\_v.\\_Causby](https://en.wikipedia.org/wiki/United_States_v._Causby)

I am concerned about devaluation of my property value, as well as my ability to hear morning birdsong in my backyard and evenings.

Please take these comments into consideration during your review.

Sincerely,



Constance Holloway

5213 NE 180<sup>th</sup> St

Lake Forest Park, WA 98155

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## Response to Comment

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Dear Constance Holloway:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### **General Responses**

- 3-2: Use of the DNL Metric
  - 3-4: Noise Analysis Methodology
  - 4-1: Sources of Existing Air Pollution
  - 4-2: Air Quality
  - 6-2: What is the Impact on Property Values?
  - 6-5: What is the Impact on Wildlife?
- 
-

P.O Box 413

Silvana, WA 98287

October 31, 2018

Environmental Science Associates

Paine Field Supplemental EA

5309 Shilshole Ave. NW, Suite 200

Seattle, WA 98107

Please add our names to those in favor of approval of the Paine Field air terminal. The traffic to Seatac airport is overwhelming for anyone in our area attempting air travel, and this approval will help to alleviate that traffic for everyone.

Regarding noise, our home is in the path of both Whidbey Island naval air traffic and Boeing test flights. Neither is offensive. Paine Field has long been known as a military flight zone and commercial air traffic should be expected.

We encourage this approval to be issued as soon as possible.

Thank you,

Handwritten signatures of Ralph Monty and Mary Ann Monty in cursive script.

Ralph and Mary Ann Monty

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## **Response to Comment**

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Dear Ralph and Mary Ann Monty:

Thank you for your comments regarding the Proposed Action at Paine Field.

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# Comment Form

**Snohomish County Airport/Paine Field  
Draft Supplemental Environmental Assessment  
Public Information Workshop  
Monday, October 29, 2018**

Name: Laurie Nichols  
 Address: 17811 40th PL W.  
Lynnwood, WA 98037  
 Phone or Email: laurnichols@comcast.net

Please provide comments in the area below. (See back or attach additional sheets if necessary):

Why wasn't a more comprehensive EIS done?

Why wasn't the effect on home values studied??  
 \* My home is directly in the flight path south of Paine Field.

What assurances are there that cumulative impacts of all scheduled service will be assessed in the future if operations increase? :-)

The comment period ends on November 2, 2018. Comments may be submitted at the Public Information Workshop or to the following addresses:

\* EMAIL: [PaineField@esassoc.com](mailto:PaineField@esassoc.com)

MAIL: ENVIRONMENTAL SCIENCE ASSOCIATES  
 PAINE FIELD SUPPLEMENTAL EA  
 5309 SHILSHOLE AVE NW, SUITE 200  
 SEATTLE, WA 98107

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## Response to Comment

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Dear Laurie Nichols:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### **General Responses**

1-1: Adequacy and Use of FAA Guidance

1-2: Scope of the Supplemental EA Analysis for Future Operations and Passengers

1-3: Flawed/Inadequate Supplemental EA

1-5: Additional Study Should be Conducted

6-2: What is the Impact on Property Values?

6-8: Cumulative Impacts

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## Comment Form

**Snohomish County Airport/Paine Field  
Draft Supplemental Environmental Assessment  
Public Information Workshop  
Monday, October 29, 2018**

Name: Michael Hart  
 Address: 17811 40th PL W  
Lynnwood, WA 98037  
 Phone or Email: mdhartmike1@comcast.net

Please provide comments in the area below. (See back or attach additional sheets if necessary):

What criteria defines significant impact??  
 \* Our home is directly in the flight path  
 south of Paine Field.

What is the method for insuring that any  
 mitigation money is actually paid??

How will cumulative impacts of future  
 service increases be assessed??

The comment period ends on November 2, 2018. Comments may be submitted at the  
 Public Information Workshop or to the following addresses:

EMAIL: [PaineField@esassoc.com](mailto:PaineField@esassoc.com)

MAIL: ENVIRONMENTAL SCIENCE ASSOCIATES  
 PAINE FIELD SUPPLEMENTAL EA  
 5309 SHILSHOLE AVE NW, SUITE 200  
 SEATTLE, WA 98107

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## Response to Comment

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Dear Michael Hart:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### **General Responses**

1-8: Significance of Project Impacts

1-9: How Is Significance Defined?

6-8: Cumulative Impacts

6-11: Mitigation

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Jerry D. Vergeront  
2125 W. Mukilteo Blvd.  
Everett, WA  
98203

Environmental Science Associates  
Paine Field Supplemental EA  
5309 Shilshole Ave NW, Suite 200  
Seattle, WA 98107

October 31, 2018

To the comment responders,

I have reviewed the full 2012 Environmental Assessment, as well as the draft assessment. I need to first comment that EA is both woefully under-scoped and it appears to have been a bias assessment specifically designed to produce a preferential assessment of the applicant's project (through a series of limited reviews, incorrect data used for reviews, and the purposeful omission of both data and process).

That being said, instead of general comments, I have a series of direct questions that point out deficiencies in the work. I expect to receive a formal response to my questions as part of mandatory review.

1. The final scope of the engagement appears to be so limited in scope as to not address all community impacts.
  - a. Who, specifically, determined the scope of the assessment?
    - i. Please note, I am looking for actual names of representatives, not a generic statement of "teams" from the airlines, Paine Filed, and ESA.
  - b. How, exactly, was the scope determined?
  - c. Did ESA have a final say in the scope?
2. According to Section 2 of the PAE Supplemental, "The need for the proposed action is to meet demand for scheduled commercial air service within the area, as identified by Alaska Airlines, United Airlines, and Southwest Airlines."

Determination for increased activity has been based on FAA forecasts (see Appendix C of the supplement), as provided by ESA. Further, in discussions with ESA, I was told that the numbers flight increases is based SOLELY on expectations of Alaska, United, and Southwest airlines. This limited review appears to be inadequate to fully validate the reality of demand over the course of the next decades (I use decades because ESA, in their reports have projection as far out as 25 years).

Questions:

- a. Did ESA examine the veracity of the airlines' claims of demand? If so, how; if not, why?
- b. Did ESA look to alternate projects that are intended to reduce the demand for air traffic over the next 20 years? For example, have projected improvements in rail been taken into consideration? More importantly, autonomous cars and highways that allow for 3-digit speeds are starting to be turned into a reality, with a projected coast-to-coast high-speed

highway specifically for autonomous cars in the works. Have any other transportation improvements been taken into consideration to balance against a for-profit organization's business projections? If not, the projections used by ESA are woefully incomplete and do not paint an accurate projection.

3. Did ESA consult with the Secretary of the Interior, per 49 USC § 47101(h)? If so, where is this consultation? If not, why not?
4. Per 49 USC § (g)(2)(C) and (D), Ground access and access to facilities must be considered and integrated with master system plans. However, it appears that this requirement has not been met, as all access impacts have not been considered nor evaluated. Access to facilities is not limited by only a few intersections; all access, including I-5, must be taken into consideration.

Questions:

- a. Why was the scope limited to only a few intersections, when it is not only apparent that I-5 will be impacted, but that I-5 impact consideration is part of DOT planning when reviewing routes and road maintenance?
  - b. When will the other ground access impact be included, per statute? If this study was conducted, why was it not part of the final reports?
5. According to 49 USC § (b)(11), projects should be "administered to encourage projects that employ innovative technology." What innovative technology is going to be included in this project, or does the assessment exclude this requirement?
  6. Impact analysis have been overturned if the applicants:
    - Select a consultant known to have a perspective likely to produce a preferential assessment of the applicant's project; and
    - Attempt to influence the consultant's work by making payment or the lure of future work contingent upon favorable findings.
      - a) What steps had been taken to review past reporting to ensure that the selection of Environmental Science Associates are not an organization who tend to treat Alaska Airlines, United Airlines, and Southwest Airlines with preferential treatment?
      - b) Environmental Science Associates has a proven track record of hiring members of city and county planning organizations; what steps have been made to ensure that ESA is not being unduly influential towards the planning commission? Is EVERY member of the planning commission willing to sign a document that they will not work for ESA?
  7. Per 49 USC § 47106(a)(6)(A), a master plan must take into consideration impacts on solid waste and recycling.
    - a. Where is the data that shows impact to solid waste and does the master plan take this into consideration? A conclusion was issued, but there is no data supporting this conclusion.
    - b. In a discussion with ESA, they informed me that ONLY solid waste that is produced DIRECTLY by the airport and only waste gathered from the cleaning of airplanes was studied. Where is the data around how much waste will be brought into the area along with each passenger arriving?
    - c. It has been acknowledged by both ESA and Snohomish County that businesses supporting the commercial use of Paine Field will be forthcoming (e.g. more hotels,

restaurants, etc...). This has a major impact on solid waste that will be going to the Airport Road transfer station. Did ESA study this? Is so, where is the data; if not, why was this not included?

8. Per 49 USC § 47106(g), the Secretary of Homeland Security MUST be consulted. Has the DHS Secretary been formally consulted? If so, where is the record of that consultation; if not, why?
9. Section 5.10.1 of the PAE Supplemental, the report lists Energy and Utility Use Suppliers will have an impact to the expected use.
  - a. Have increases in use been analyzed to determine if this will have an economic impact to the communities, as required by 49 USC § 47101(g)(1)? If so, where is the data; if not, why?
  - b. As stated above, the commercial use of the airport will bring about the formation of support businesses. How will the support businesses affect energy and utility use? Will this cause an economic impact to the community (in the form of having to pay for another transfer station, the buying of more power, etc...)?
10. According to the study, in section 6.13.2, the Proposed Action would add 2,185 daily vehicle trips. The study showed that it will not reduce traffic to an intolerable level. But, commercial use of Paine Field adds over 2100 vehicles on our roadways. As noted above, ESA took a VERY limited look at road use.
  - a. The result of road usage pointed to a mitigation fee. Does this mitigation fee include mitigations of road maintenance over a course of time?
  - b. Why did ESA NOT look at on-going economic impacts to the community?
  - c. Why did the ESA not include expected support businesses when conducting traffic increases?
  - d. Was Gibson Traffic Consultants, Inc.'s data reviewed for accuracy and an unbiased result? If so, where is that review; if not, why not?
11. On the subject of traffic, it was pointed out that in some cases traffic would not be worse, because it could not get a lower rating. The reality is that even if traffic has been given an F rating, there is a marked difference between receiving an F rating by going half the speed limit, and an F rating by going 1/10<sup>th</sup> of the speed limit. Where is the final data around traffic?
12. Section 6.16.3.5 states that "The traffic study also notes that mitigation fees would be assessed by local governments to accommodate the anticipated increase in traffic." According to 6.17, many one-time fees have been paid.
  - a. Will there be ongoing mitigation fees to cover the increase in traffic, or will that cost be shifted to the taxpayers?
  - b. As the economic impact to the cities and counties must be assessed, what is the projected additional cost that the taxpayers will have to pay in road maintenance due to this sharp uptake of vehicles on our roads? (NOTE: An ESA representative told me, personally, that ongoing maintenance cost is a county issue not an issue for ESA. However, this WILL have an on-going economic impact to the community at large)
13. Do you have the record regarding Environmental Science Associates' and Gibson Traffic Consultants, Inc.'s recommendation records? Do they lean strongly towards allowance of airport expansions through assessments showing "no impact" (leaning towards the best

interests of Commercial Airline Companies)? Can we get a copies of their recommendation records?

14. I noted in the technical memorandum that "ESA is assisting Alaska Airlines, United Airlines, Inc., and Southwest Airlines Co. with the preparation of a Supplemental EA for Operations Specifications." It is important to note that ESA was not assisting any local governments or organizations in this matter.
- a. Did the airlines did pay the county to choose their own, and presumably neutral, organization for the EA assessment?
  - b. What actions were taken to ensure a neutral selection of an assessor, rather than one that would be bias towards the airlines?



Jerry D. Vergeront

# Comment Form

**Snohomish County Airport/Paine Field  
Draft Supplemental Environmental Assessment  
Public Information Workshop  
Monday, October 29, 2018**

Name: LANA WEED

Address: 3608 Serene Way

LYNNWOODS, WA 98087

Phone or

Email: lanaandjerry@frontier.com

Please provide comments in the area below. (See back or attach additional sheets if necessary):

I feel that the Environmental Assessment for Snohomish County Airport/ Paine Field was not complete. There was no study done about increased noise, emissions & traffic which definitely comes with a commercial airport. I think that an Environmental Impact Study should be done as it is more comprehensive.

The comment period ends on November 2, 2018. Comments may be submitted at the Public Information Workshop or to the following addresses:

EMAIL: [PaineField@esassoc.com](mailto:PaineField@esassoc.com)

MAIL: ENVIRONMENTAL SCIENCE ASSOCIATES  
PAINE FIELD SUPPLEMENTAL EA  
5309 SHILSHOLE AVE NW, SUITE 200  
SEATTLE, WA 98107

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## Response to Comment

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Dear Lana Weed:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### **General Responses**

- 1-1: Adequacy and Use of FAA Guidance
  - 1-2: Scope of the Supplemental EA Analysis for Future Operations and Passengers
  - 1-3: Flawed/Inadequate Supplemental EA
  - 1-5: Additional Study Should be Conducted
  - 4-2: Air Quality
  - 5-1: Existing and Future Traffic
  - 5-2: Traffic Analysis
- 
-

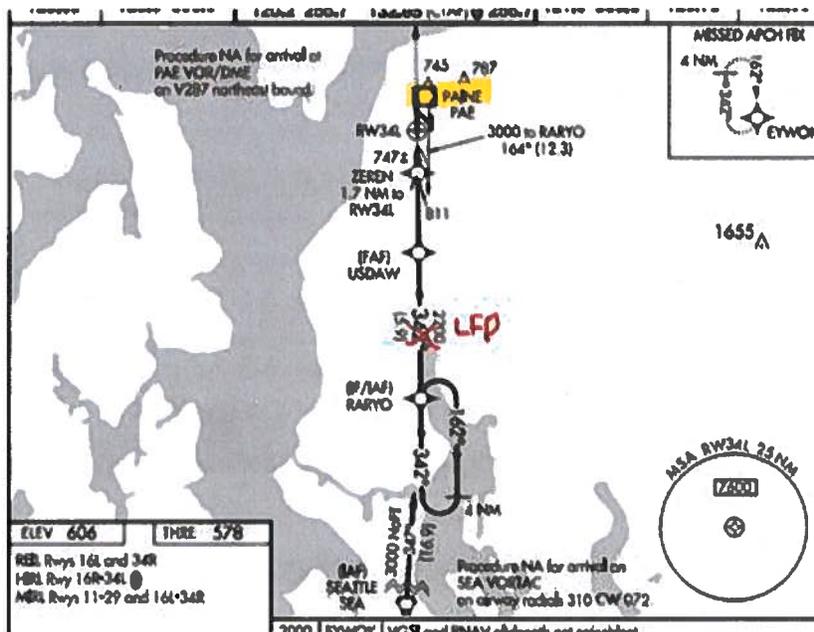
## P215 - Duplicate of P209

Environmental Science Associates  
Paine Field Supplemental EA  
5309 Shilshole Ave NE  
Suite 200  
Seattle, WA 98107

To whom it may concern,

I would like to register comments regarding the Environmental Impact Statement for commercial aircraft on Paine Field.

I am a resident of Lake Forest Park and this city is 10 miles south of Paine Field directly in line with the north south runway. I estimate that planes taking off to the south will be at an altitude of 2000 feet when they reach Lake Forest Park.



My main concern is noise; a secondary concern is emissions.

A single airplane taking off to the south will affect tens of thousands of homes in this densely populated region.

The DNL (Day Night Average Sound Level) is a flawed method of measuring acoustical impact on the community. Humans and wildlife do not hear decibels as averages, they hear a sound from the point of origin at the time it was emitted. Using averages- and an average as high as 65 dB- could mean a deafening explosion could occur but averaged out would remain insignificant as far as noise criteria within the EIS is concerned. When I lived 20 miles north of SeaTac in Central Seattle, the air traffic noise was so loud, it was impossible to hear a human voice (that is, have conversation) outside during peak air traffic hours. Lake Forest Park is much closer to Paine Field than Central Seattle is to SeaTac, and is on the take off flight path, not the approach.

I urge you to consider the impact allowing additional flights over our area will cause for our community already traumatized by the increased air traffic into SeaTac. The Lake Forest Park Comprehensive Plan includes language around mitigating air traffic: Policy EQ-6.4: "Coordinate with other agencies and local governments in monitoring aircraft noise levels and flight patterns, and in finding ways to minimize air traffic noise."

[https://www.cityoflfp.com/DocumentCenter/View/2578/LFP\\_Comprehensive-Plan\\_2015\\_Vol1?bidId=](https://www.cityoflfp.com/DocumentCenter/View/2578/LFP_Comprehensive-Plan_2015_Vol1?bidId=)

Property owners own 87' of the air above their homes (Supreme Court, United States vs. Causby): "If the landowner is to have full enjoyment of the land, he must have exclusive control of the immediate reaches of the enveloping atmosphere." William O. Douglas

[https://en.wikipedia.org/wiki/United\\_States\\_v.\\_Causby](https://en.wikipedia.org/wiki/United_States_v._Causby)

I am concerned about devaluation of my property value, as well as my ability to hear morning birdsong in my backyard and evenings.

Please take these comments into consideration during your review.

Sincerely,

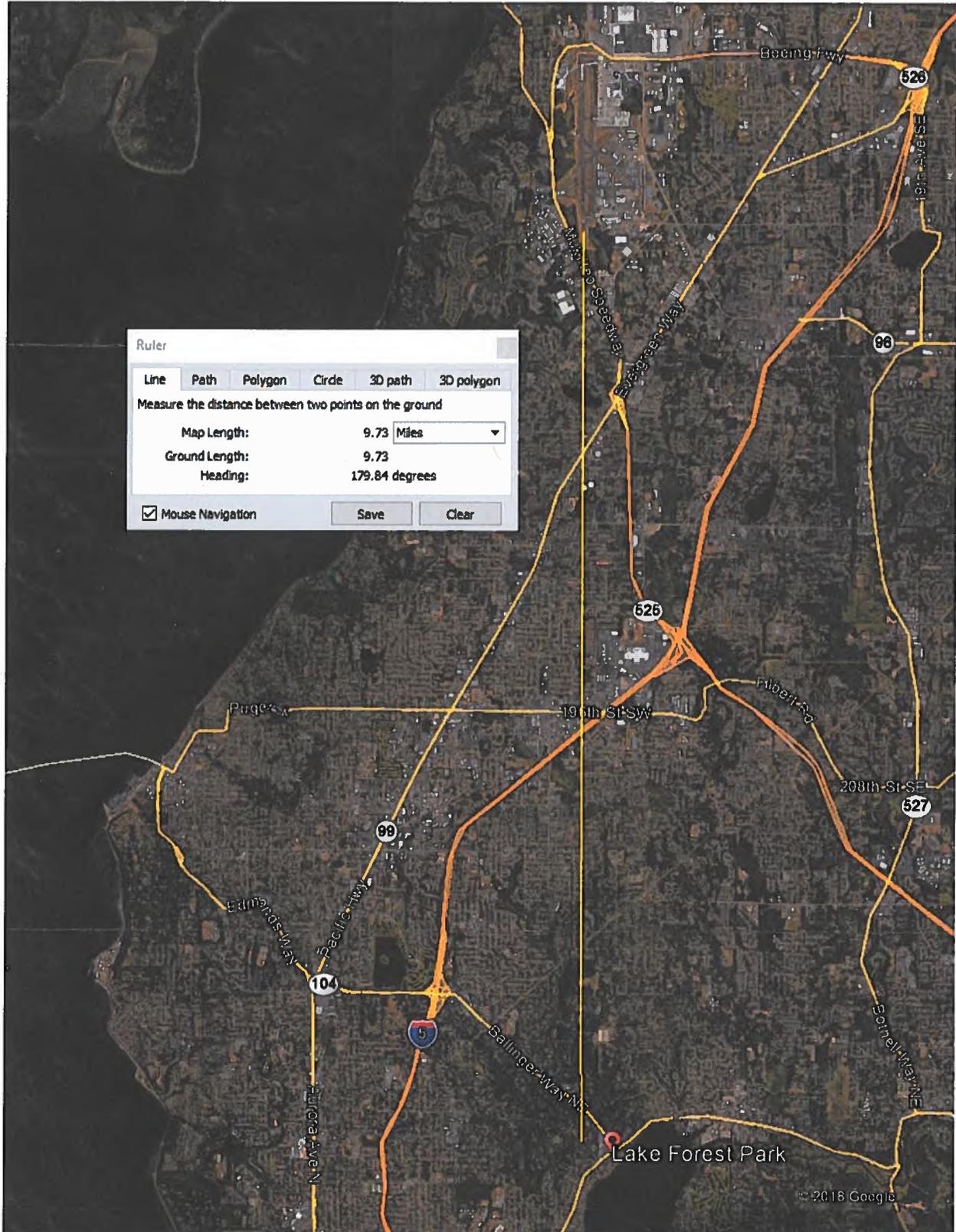


Constance Holloway

5213 NE 180<sup>th</sup> St

Lake Forest Park, WA 98155

**P215 - Duplicate  
of P209**



Dr. Alice H. Suter  
Conference Consultant  
(November 1991)

“HUD, DOT and EPA recognize Ldn = 55 dB as a goal for outdoors in residential areas in protecting the public health and welfare with an adequate margin of safety (Reference: EPA "Levels" Document.) However, it is not a regulatory goal. It is a level defined by a negotiated scientific consensus without concern for economic and technological feasibility or the needs and desires of any particular community.

The Department of Transportation's Federal Aviation Administration (FAA) has adopted a DNL of 65 as the point above which residential land-use becomes "normally unacceptable." Below this level, the FAA does not require airport authorities to draw noise contours or discuss the impact of airport noise on the surrounding communities for purposes of compatibility planning or to receive grants under the Part 150 program. (20) Thus, public policy decisions, at least on the federal level, have not considered the annoyance of individuals living in the DNL 55-65 dB range.

Recent research confirms the findings of earlier investigations relied upon by the EPA, that annoyance is often generated at day-night average sound levels well below 65 dB (Fidell et al., 1985; Fidell et al., 1991; Hall et al., 1981). Figures 4 and 5 from Fidell et al. (1991) portray the responses from surveys of two mid-sized airports in California: Burbank Airport and the Orange County Airport. The percentage of respondents highly annoyed is depicted as a function of DNL, and compared to the Schultz curve. Both studies show significantly greater numbers of people highly annoyed than would have been predicted by the Schultz curve. For example, at 60 dB, as many as 70 percent of the Burbank population described themselves as highly annoyed and some 40 percent near the Orange County Airport.”

Also Noise: A Health Problem (Office of Noise and Abatement and Control, 1978 states that:

“It is finally clear that noise is a significant hazard to public health” and “Truly, noise is more than just an annoyance”

FAA guidelines Order 5050.4 dictate that increases in noise levels in wise sensitive land uses of over 1.5 DNL are considered significant. The Draft should be revised to see if proposed action would cause an increase of over 1.5 DNL in noise sensitive areas.

The maximum noise levels should also be plotted for the surrounding neighborhoods. A sudden loud noise of an aircraft flying over residential areas can wake people up at night. If it is not possible to determine the maximum noise levels, then night flights between 10:00 PM and 7:00 AM should not be allowed except for emergency landings.

The Draft should also be revised to consider the social economic impact of commercial noise. Airport proximity is detrimental to residential real estate values. The economic impact is highest in moderately priced and expensive neighborhoods. The Draft should be revised to include the detrimental economic noise impact both for homeowners and for city and state real estate tax revenues. Some homeowners will need to leave the area due to aircraft noise, so in

Comments Submitted by:

Fred Clark

1002 9th St,

Mukilteo, WA,

98275

fredoclark@gmail.com

November 1, 2018

## Paine Field Draft Supplemental Environmental Assessment Comments

The draft Supplemental Environmental Assessment did not include adequate community involvement. FAA AC 150/5020-1 refers to FAA AC 150/5050-4 Citizens Participation in Airport Planning. Page 40 of FAA AC 150/5050-4 notes that a comprehensive program is suitable for complex and/or controversial studies. There were lawsuits against the original Environmental Assessment, so the proposed introduction of commercial aviation at Paine Field should be considered controversial, which should have included comprehensive program of community involvement. Public involvement should have occurred early in the process to help identify alternatives to the proposed action. The single public hearing on October 29, was called a workshop, but it did not involve anything which could be considered a workshop. Also, the time between the October 29th meeting first opportunity to ask questions, and the Nov 2nd deadline for submitting comments is too short. I request additional time to submit further comments. The Draft Supplemental Environmental Assessment should be redone with a comprehensive program of community involvement.

The Draft Supplemental Environmental Assessment shows 65 DNL noise contours for 24 passenger flights a day, and for the alternative, no passenger flights. The 65 DNL is an upper limit above which open space and residential zoning are not compatible. The draft indicates that because the land within the 65 DNL boundary is not zoned for residential or open space, there is no significant impact due to noise. After attending the hearing, I understand that this means that there is no significant impact to the parties wishing to introduce commercial aviation service at Paine Field. The Draft Supplemental Environmental Assessment should be revised to consider potential health impact due to noise impact to surrounding residents with 55 DNL as an upper limit that would show no significant impact. I copy below information that supports using 55 DNL:

Administrative Conference of the United States  
Noise and Its Effects

addition to lower sale value, the economic impact analysis should include costs for buying, selling and moving, which would be approximately %10 percent of the current home value.

The Draft Supplemental Environmental Assessment should be revised to study the effects of traffic flow on the Hyw 525. The traffic is typically congested throughout the day. The Draft only looks at intersections. Mitigation to increase the width of Hwy 525 to reduce congestion should be included. The Draft also states that the impact of increased traffic due to the proposed introduction of commercial aviation service will be of no significant consequence due to mitigation fees. The proposed increased in commercial aviation vehicle traffic should not be allowed until the mitigation construction is completed.

The Draft should be revised to consider the impact of increased pollution run off and the impact on endangered salmon in Big Gulch and Japanese Gulch drainages. Also the environmental impact of possible dumping of aircraft fuel over the surrounding areas, and the increased risk hazardous material leaks at the airport should be evaluated, with mitigation implemented.

The Draft states that the addition of commercial service will add .03% of US greenhouse gas emissions, and concludes that this is not significant, without providing a specific rationale. It also indicates that this increase will be compensated for by other reductions taken somewhere else, without stating how these reductions will be implemented. I disagree with this assessment. In Washington state, shellfish hatcheries are failing because of an acidifying ocean, record-breaking wildfires are destroying forests and communities, and declining snowpack and earlier snowmelt in the mountains are jeopardizing summer water supplies. Orcas and salmon runs are endangered. Worldwide catastrophic climate change is predicted unless there is a dramatic reduction in green house gasses. Any further increases in greenhouse gas emissions is of major significance.

A handout at the October 29 meeting states that alternative sites were not considered because the FAA does not have the authority to direct or influence commercial service providers to provide service at a particular airport. This shows that an Environmental Impact Statement is needed for region wide growth management transportation planning.

Please acknowledge receipt of these comments.

**P216 -  
Duplicate of  
P149**

PUBLIC INFORMATION WORKSHOP/PUBLIC HEARING FOR  
AMENDMENT TO THE OPERATIONS SPECIFICATIONS FOR AIR CARRIER  
OPERATIONS AND AMENDMENT TO A PART 139 CERTIFICATE  
FOR THE SNOHOMISH COUNTY AIRPORT/PAINE FIELD

5:00 p.m.  
Monday, October 29, 2018

Lynnwood Convention Center  
3711 196th Street Southwest  
Lynnwood, Washington

KIMBERLY MIFFLIN, CSR  
NORTHWEST COURT REPORTERS  
1415 Second Avenue, Suite 1107  
Seattle, Washington 98101

(206) 623-6136

E-mail: [nwcourtreporters@iinet.com](mailto:nwcourtreporters@iinet.com)

SPEAKERS

1 SHARON SWAN **P217**

2 TERRY WILCOXSON **P218**

3 VALERIE KRUEGER-STAHNKE **P219**

4 ROB STAHNKE **P220**

5 KRISTIE SIMARD **P221**

6 GLEN BACHMAN **P222**

7 MARGARET ANN LYMAN **P223**

8 MARIE MUCKERMAN **P224**

9 BRAINARD LEE **P225**

10 KEVIN STOLTZ **P226**

11 JANE CHAMBERLAIN **P227**

12 DI TOWNSAN **P228**

13 JERRY BERGERONT **P229**

14 TED HIKEL **P230**

15 LAURICE WHITED **P231**

16 KENDAL HARR **P232**

17 SHEPARD CUTLER **P233**

18 CONNIE CHAPMAN **P234**

19 GUY FLEISCHER **P235**

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1           **P217**           SHARON SWAN: Sharon Swan, S-W-A-N. My  
2 comments are I'm just really frustrated that the original  
3 intent back in the 1970's with the original MRD stated that  
4 in good faith Paine Field would never become a regional  
5 airport. The bureaucrats are making the decisions without  
6 consideration of the surrounding communities and what they  
7 want. I would suggest that Mukilteo, Lynnwood, Edmonds,  
8 Mountlake Terrace, all those neighborhoods from previous  
9 comments do not want a regional airport due to the impact  
10 of traffic, impact to the schools, potential loss in  
11 property value. It just seems that no one is taking into  
12 consideration looking at previous regional airports like in  
13 Denver, John Wayne in Orange County, San Diego. Those  
14 airports blossomed into full international airports with  
15 the intention that they would not initially.

16                       So what does that mean to the community? Does it  
17 mean people have to sell their homes to the airport or the  
18 FAA? What if there is an emergency landing? What happens  
19 to the fuel? Does it go in the Sound, does it go over the  
20 neighborhood? So there's so many unknowns, and the bottom  
21 line is nobody wants it. That's it.

22           **P218**           TERRY WILCOXSON: My name is Terry  
23 Wilcoxson. The reason I would like to comment this evening  
24 is just to address there's quite a few people out there who  
25 state that the jobs that the airport will bring into the

1 commercial airline service are low-paying jobs and people  
2 aren't able to support families and everything on those  
3 jobs. And I would just like to say that I've been involved  
4 in the ground handling business for the past 40 years at  
5 Paine Field, and during that time I married, I bought a  
6 home in Snohomish County, had a family, sent my kids to  
7 college, and I did all of this on the income that I  
8 received by working out at Paine Field. My wife for health  
9 reasons does not work.

10 And so I'm just here to say that the jobs do pay  
11 well enough to raise a family, and that's really it.

12 **P219** VALERIE KRUEGER-STAHNKE: It's Valerie  
13 Krueger-Stahnke. So I live north of the main runway in a  
14 great neighborhood, and we're only maybe two miles from the  
15 end of the north runway and we get all of the Boeing jets  
16 and we're used to that volume right now. The Propeller  
17 planes don't bother us, it's the large jets that a person  
18 can hear. I've gone outside with a little decibel meter  
19 and they are 85 decibels, so it's quite loud, and they go  
20 low over our houses, and we are not in a general study  
21 area. So that's my huge complaint that we're not in the  
22 general study area.

23 And I can leave behind just a little circle of where  
24 we're at and we really should have been included in the  
25 study area. We're just directly north. The study area was

1 just too small. It fit into a nice little rectangle, but  
2 left out all of these neighborhoods that are flown over  
3 between the airport and the ocean. So we're really worried  
4 about the tripling. It's almost four times the number of  
5 flights that are going to be going over us now.

6           So we have about six flights a day and adding 24  
7 is obviously about three times as many jets. And the new  
8 number of jet flights shouldn't be divided into total  
9 flights including the Propeller planes, because that's  
10 irrelevant. The Propeller planes aren't the issue. They  
11 are the issue for some areas, some neighborhoods, I guess,  
12 but of course they are not as loud individually as the  
13 jets. So tripling of the jets makes us nervous for safety  
14 and well as our home values and just our quality of life.

15           And I convinced my husband when we bought here  
16 like seven years ago, I said, oh, there is an agreement  
17 that there will not be commercial flights, and that's that  
18 Mediated Role Determination that was first passed in like  
19 the 70's, was reaffirmed in 2007. And we realize it's in  
20 the name of money that that was overlooked and we're now  
21 having the commercial flights come in.

22           But it's very unfortunate. And we do think there  
23 should be mitigation. Basically the report, the 136-page  
24 report kept saying there's no single family homes impacted  
25 and there's no mitigation needed, and that doesn't seem

1 fair.

2 **P220** ROB STAHNKE: My question was about how come  
3 the residents were not notified of this. We have some  
4 residents that had no idea that this was going to happen.

5 The other thing was why did the line, the  
6 boundary line, stop right before the north neighborhood.  
7 Why wasn't the test done through to the water. What is the  
8 time weighted average of noise now at the top of the hill  
9 where the boundary is now versus the time weighted average  
10 of what's at the bottom of the hill by the waterfront.  
11 What would be the time weighted average for the decibel  
12 noise in both of those locations after the expansion.

13 The other question is why do they -- why do they  
14 not run a 48-hour simulated test so they know exactly what  
15 that noise will be, because they haven't. That way they  
16 could tell and report to all the neighbors in the local  
17 communities exactly what they have now versus what they're  
18 going to have and then they'll also know what that  
19 nighttime phase will feel like as well.

20 I wonder if the FAA has anything to say about the  
21 safety factor of the planes flying overhead of houses and  
22 nearby neighborhoods and what will be their resolve when  
23 that noise is too much for the citizens. And what is the  
24 end all in the expansion. Is this going to be the only  
25 expansion we ever see or are we going to be expecting 48,

1 64, et cetera, more flights per day as this takes hold.

2 But more transparency and honesty will be the key  
3 operative to best relations with the neighbors and the  
4 local communities.

5 **P221** KRISTIE SIMARD: My name is Kristie Simard,  
6 K-R-I-S-T-I-E, last name S-I-M-A-R-D. I am here to express  
7 a lot of concerns about the Paine Field expansion, the  
8 environmental impact statement in particular at this point  
9 when they say that 24 round trip flights are going to have  
10 -- what's the word they use -- negligible impact,  
11 environmental impact. Well, they obviously don't live in  
12 the flight path, which I do now. There's going to be way  
13 too much noise involved and it's just a foot in the door.  
14 It will never stay at 24. We will have a huge regional  
15 airport up here which none of us signed up for when we  
16 bought our homes. I have lived in mine for 40 years. And  
17 I have to tell you, I feel like this is being shoved down  
18 my throat.

19 I thought it was very interesting timing that in  
20 the "Seattle Times" on Sunday there was a huge article  
21 about the south end people being so upset about the  
22 continued expansion at their airport, Sea-Tac.

23 I understand that we have to provide air travel  
24 facilities, but there's got to be another way to do this.  
25 You either have larger planes, you limit the flights,

1 people will have to book farther ahead. We don't need to  
2 ruin the entire west coast of Washington, which is exactly  
3 what we're doing. These are people who have million dollar  
4 plus homes, some of them. They are being really  
5 financially impacted.

6 My time is probably up, so I guess I'll be quiet.

7 **P222** GLEN BACHMAN: My name is Glen Bachman. I  
8 live at 433 Crown Drive, Everett, Washington. I think it's  
9 imperative that we go forward with commercial flights. I  
10 see that the new aircraft that's introduced will be a lot  
11 lower impact both with sound and with emissions. I think  
12 that this is the one key for the tipping point to the  
13 economics of Snohomish County, quality of life for all of  
14 our residents, but not just Snohomish County, because we  
15 know this airfield will be used by north King County  
16 persons as well.

17 I understand why it wasn't done, but if measured,  
18 the amount of traffic that wouldn't be going to Sea-Tac, it  
19 would offset the going to measurements. I understand why  
20 it wasn't taken, but we know that it exists.

21 Again, the newer aircraft is much quieter and  
22 doesn't fly as low as the newly built aircraft. And, yes,  
23 they do fly over my house, but I do know also because I  
24 know a little something about commercial aircraft, that  
25 they would be flying so high I probably won't even hear

1 them anyway. That's all.

2 **P223** MARGARET ANN LYMAN: Margaret Ann Lyman. So  
3 I have -- my biggest concern is the pollution, the water  
4 pollution over Puget Sound Salish Sea. I'm really  
5 concerned about offloading fuel when they come in, planes  
6 come in because a lot of times they will fly out over water  
7 if they've got an extra heavy load. I am really concerned  
8 about the sea life, the marine life, because that offloaded  
9 fuel is toxic to animal life. And the orcas are at risk,  
10 the salmon, several species of salmon are at risk. They  
11 all navigate through the Salish Sea, Puget Sound.

12 I live at the SHAG right now, which is right  
13 here, and those planes are going over our building every  
14 day, and I have a garden, and I know that should there be  
15 any fuel coming off, it will affect my garden right down  
16 below because they are quite low. So I'm concerned about  
17 the nature and wildlife and plants.

18 I also know that Redondo Beach in Burien do not  
19 have garden tours because of their problem with offloading  
20 of fuel, and it definitely affects the plant life, plugs up  
21 the pores, and the plants can't breathe and they die. And  
22 we have a beautiful region and I would hate to see that  
23 happen here.

24 **P224** MARIE MUCKERMAN: My name is Marie  
25 Muckerman. I live in the Goat Trail area, so I'm right

1 underneath the path of the planes all the time. My biggest  
2 concern is the traffic. I mean, the planes are already  
3 going and whatever is landing from the sky, I'm not sure  
4 what it is but it makes the driveway and the sidewalks very  
5 black, kind of nasty. It has to come from the sky because  
6 it doesn't land -- if you leave the car parked, there's  
7 nothing underneath there.

8           But my concern is the traffic which is already  
9 tremendously horrible anytime Boeing lets out, the ferry,  
10 the ferry dumps out a full load of cars that are nonstop  
11 down the Mukilteo Speedway to 84th and then onto the Boeing  
12 freeway or all the way down the speedway to I-5. And then  
13 you have Boeing letting their shift out. And it's nonstop  
14 from the Boeing plant onto the freeway, endless cars no  
15 matter whether you're north or south on I-5, going on 128th  
16 Street, which is Airport Road, heading towards Mukilteo  
17 Speedway. It's impossible to get anywhere. It's horrible.

18           And now you're going to add airline traffic,  
19 meaning airline fliers, people who work on the airlines,  
20 people who work at the airport and all that extra traffic.

21           I don't know how they can reasonably think it's a  
22 good idea. I have lots more to say but that's probably  
23 about it. It seems insanity. It really does.

24           **P225**           BRAINARD LEE: So I just want to say I'm 100  
25 percent for the Paine Field terminal. I've been watching

1 it be constructed for the last three, four, five, six  
2 months. I have my own airplane on the airfield that I fly  
3 on a regular basis.

4 So my concerns or questions are about the  
5 security enhancements that might take place because we have  
6 airline traffic. I park on the east side by ground  
7 aviation's building over there, so that's opposite where  
8 the terminal is. I'm concerned if there will be any impact  
9 to us going through the gate to get to our private  
10 airplanes, that sort of thing.

11 The other thing is I can't wait to start because  
12 I want to take the first flight. So the parking  
13 arrangements, whether it's going to be paid or free and  
14 will there be shuttles to different areas, those kind of  
15 things is what I'm interested in. And also when will the  
16 airlines start flying. That's it.

17 **P226** KEVIN STOLTZ: Kevin Stoltz. I deliberately  
18 moved to Mukilteo near Paine Field in 1983 and went to work  
19 for Boeing in Everett as an aeronautical engineer. One of  
20 the jobs I had while working at Boeing was as a noise staff  
21 engineer. I earned my pilot's license at Paine. We raised  
22 our son and daughter in Mukilteo. We have lived in  
23 Mukilteo for the past 35 years, the last 14 of which have  
24 been in old town near the Mukilteo ferry. Only in the past  
25 couple of years have we experienced noise from nighttime

1 Dreamlifter flights that not only abruptly wake us up while  
2 sleeping, but as my wife, Dana, describes, literally shakes  
3 us awake. Our bedroom is on the second floor of our home  
4 with the window facing north, which is the approach for  
5 Paine runway one six right. Measured nighttime ambient  
6 noise levels at our home are 30 to 32 dba and measured  
7 noise levels at our home for Dreamlifter arrivals are  
8 typically 70 to 75 dba and departures are 75 to 80 dba.

9           Based on our current experience with the  
10 nighttime Dreamlifter flights that occur on average once  
11 every three days, we feel the projected 4.5 scheduled  
12 commercial air service nighttime flights will force us to  
13 move. We're already contemplating needing to move due to  
14 the Dreamlifter flights, but are hopeful Boeing will help  
15 curtail its evening flights.

16           At a recent Paine Field community council  
17 meeting, airport staff told us the scheduled commercial air  
18 service flights will start as early as 5 a.m. and run as  
19 late as midnight. That only leaves us a five-hour block  
20 for sleeping. Combined with the random nature of the  
21 nighttime Dreamlifter flights, we'll be forced to move.  
22 Granted, the nighttime Dreamlifter flights tend to come in  
23 bursts. For example, just this past Saturday early morning  
24 there were Dreamlifter flights at 1, 3:30, 4:54 and 6:57  
25 a.m.

1           The 1990 Airport Noise and Capacity Act prevents  
2 local jurisdictions from imposing nighttime curfews on  
3 airline flights. However, it also has provisions that  
4 allow voluntary curfews to be enforced. I believe this  
5 option should be spelled out in the environmental  
6 assessment to encourage the aircraft operators and our  
7 elected officials to work together to mitigate the adverse  
8 noise impacts that some of us are already experiencing.

9           Unresolved questions. Why doesn't the EA mention  
10 that multiple jurisdictions can work with aircraft  
11 operators to implement voluntary curfews to mitigate the  
12 adverse impact nighttime flights can have on the community.  
13 Did the EA include the recent increase of nighttime  
14 Dreamlifter flights that are currently impacting our  
15 ability to get a reasonable night's sleep on a daily basis.  
16 Why doesn't the airport and elected officials make a  
17 visible effort to discourage nighttime flights that have  
18 such a detrimental impact on some of us. What options or  
19 help is available to noise-proof our homes or assist us in  
20 moving?

21           **P227**       JANE CHAMBERLAIN: I'm Jane Chamberlain. I  
22 live in Mukilteo, and I'm a retired school teacher.  
23 Previously I taught in a school south of Seattle, south of  
24 Sea-Tac actually, and I had a first and second grade  
25 classroom. And the noise of planes flying overhead made

1 constructive communication in the classroom nearly  
2 impossible. Because I had young children, I was needing to  
3 teach phonics and sounds. The airplane noise made it  
4 extremely difficult and I resigned my position very  
5 quickly. I felt it was a real detriment to the children to  
6 have the noise interfering and it's hard enough for little  
7 ones to keep focused anyway, and the planes were a definite  
8 distraction.

9           And I think you should take that into  
10 consideration because there are schools around this  
11 airport.

12           **P228** DI TOWNSAN: My name is Di Townsan. I live  
13 at 860 Park Avenue, Mukilteo, 98275. We already have  
14 incredibly outrageous noise, so none of us are for this.  
15 But I talked to the expert on the traffic, and he said that  
16 the only thing they studied in their tests, in their  
17 studies, were intersections with lights. They only kept  
18 track of cars going in and out. So they did not reflect  
19 the backup problems that are on Mukilteo Speedway at almost  
20 any time of the day, nor did they show the backup problems  
21 on, I think it's 526, the Boeing Highway, especially at 1  
22 o'clock when Boeing lets all their people out. It  
23 obliterates Mukilteo Boulevard and it also obliterates the  
24 connection onto I-5. It makes it even worse.

25           And it also did not study I-5, which is people

1 coming up from wherever they are coming to go to the  
2 airport. Those people are not going to find flights that  
3 are on time because they can't get anywhere. We are  
4 gridlocked already. About 1 p.m. it starts, and you are  
5 gridlocked. So that's baloney. So their test is invalid;  
6 their study is invalid.

7           Then when you go to the noise, he only studied  
8 this one little place for noise that's in exactly the  
9 Boeing area. The noise, the biggest noise is the planes  
10 coming in and out. It isn't when they are taking off. So  
11 the only place he studied is the noise as they are taking  
12 off. It isn't the noise coming or going. And that's what  
13 we experience. I mean, when the Boeing Dreamlifter comes  
14 in, we all think the world is ending. It's so much noise.

15           And the trouble is and what I have a big argument  
16 about is that this is happening right over the elementary  
17 school and the elementary and the junior high school kids  
18 who are all out playing right next to the Boeing field.  
19 They're absolutely abutting each other. For them to say it  
20 doesn't affect the children is just absolutely maddening to  
21 me.

22           And the noise guy -- oh, yeah, the noise guy.  
23 And then I talked to the guy that was talking about air  
24 quality control, and I pointed out that on his paperwork  
25 they didn't even do the studies of several of the important

1 things to measure. He said, well, we're talking about  
2 emissions and you're talking about the current quality of  
3 air. I said, don't you think you should talk about the  
4 beginning point, and the beginning point should measure  
5 what our current situation is. I said, you didn't do that.  
6 All you did is take national standards of what you expect  
7 from these airplanes and you put that in the report that  
8 it's going to be okay. You didn't do the scientific  
9 method. You didn't say here is the basis, we have to do an  
10 evaluation. Here's our evaluation. Then we're going to  
11 propose, this is a theory that this might happen and then  
12 we do the test and we resolve and evaluate. No, you missed  
13 the basic steps of the scientific method. You only put in  
14 the information you already knew the answers to.

15 I totally abhor this report. I think it is  
16 whitewashed, and it is not accurate. Everybody here thinks  
17 the same thing, not just me. I've heard it from a ton of  
18 people. Thank you.

19 **P229** JEVRY BERGERONT: Jerry Bergeront. So  
20 the comment I have is that I'm not seeing ongoing economic  
21 impacts from this project. So when we're talking about  
22 traffic and adding 2,000-some new trips every single day,  
23 we're seeing that there is a mitigation fee that's a one  
24 time fee to make sure that lights are done and that traffic  
25 can flow properly. But we're seeing nothing about what the

1 ongoing maintenance, road maintenance cost is going to be  
2 for taxpayers or if it gets handed off to Paine Field, how  
3 much that's going to be. It's not under the  
4 socioeconomics, nor is it under cumulative effects either.  
5 So I'm wondering where something like this could have  
6 happened.

7 **P230** TED HIKEL: I testified at the original FAA  
8 hearing when the proposal was to allow 12 commercial  
9 flights per day at Paine Field. I signed up to hopefully  
10 receive notices of any future meetings or decisions. I  
11 heard nothing. I received no notifications. For that  
12 reason, I come here tonight with great skepticism for this  
13 meeting.

14 We no longer are talking about 12 flights a day.  
15 Now the number we are told is 24. What that really means  
16 is 24 flights in and 24 flights out, a total of 48 over  
17 flights each day. I moved to Lynnwood 50 years ago. At  
18 that time we were given assurances that Paine Field would  
19 be a general aviation airport. Those assurances were  
20 violated by the FAA and the county council in response to  
21 business interests who would not be affected by the noise  
22 and pollution of commercialization of Paine Field. Most of  
23 them live north or east of the airport. We live directly  
24 in the path of the field. We are directly impacted by the  
25 increase of the size, noise and pollution this will bring

1 to our neighborhood.

2 I have no doubt that my appearance here tonight  
3 will have no impact on your decision. It is to me obvious  
4 that this is done -- that this is a done deal and this  
5 meeting tonight is only to allow you to say, quote, we  
6 reached out to the community, we have done our due  
7 diligence, unquote. You may consider me naive or stupid in  
8 light of the past promises made about Paine Field, but I  
9 want to ask you if you're willing and able to assure us  
10 that the number of flights will be limited to 24 per day  
11 for now and for all time.

12 Perhaps I'm cynical but I fully expect Propeller  
13 and the airlines to discover that more flights will be  
14 necessary in the near future and that the number of gates  
15 will be increased to four and the number of flights in and  
16 out increased to 96 and that the future of Paine Field will  
17 be Sea-Tac 2.0. By that I assume the runway limitations at  
18 Paine Field will never match Sea-Tac, but the expansion of  
19 flights will in the future lead to hundreds of flights  
20 being added and the impacts to our neighborhoods will  
21 affect the livability and the value of our homes.

22 As I testified at the original hearing, there is  
23 still no mitigation in this plan for noise impacts. There  
24 are a dozen or more schools in the flight path, and their  
25 situation should be addressed before this plan is approved.

1           Finally, give us your assurance that the number  
2 of flights will be limited for now and for all time to 24  
3 per day. Without that assurance, it is clear you're  
4 condemning us to the same fate that the residents around  
5 Sea-Tac face. It is clear that our voices carry no weight  
6 with the FAA or the county and our fate is sealed. What is  
7 your assurance, what is your promise to us tonight?  
8 Honesty counts.

9           **P231**       LAURICE WHITED: My name is Laurice Whited,  
10 L-A-U-R-I-C-E, and the last name is W-H-I-T-E-D. So a lot  
11 of the conversation on the environmental impact was around  
12 noise and traffic and additional people, you know, coming  
13 and going to the airport.

14           My question is, one, have they considered land  
15 values around the airport because typically it decreases,  
16 and who's going to pay for the extra police or have they  
17 considered adding extra police to compensate for all of the  
18 additional traffic and people that will be in the area. It  
19 always brings crime. I mean, do you want to live in  
20 Sea-Tac or Des Moines? Do you know what I mean? Have they  
21 thought of this? Who pays for it? I can't get the sheriff  
22 to even address graffiti. They don't have the budget for  
23 it. So now who is going to pay for all the additional  
24 police that are needed for all the traffic and crime that  
25 comes to the area? Have they considered that? I wanted to

1 stay and actually ask that question because I was getting  
2 so -- all the city and council, they're all, you know, it's  
3 the money, money, money. But do they actually think of the  
4 quality of life?

5 **P232** KENDAL HARR: So there was no assessment  
6 whatsoever of any changes to I-5 traffic or either of the  
7 exits north or south of the airport, because it was not,  
8 quote, required in WSDOT protocol. This is a huge  
9 oversight. It will preclude people from actually accessing  
10 flights. And considering the fact that the "Seattle Times"  
11 recently published an article stating that we had one of  
12 the worst, top five -- sorry, I said that wrong -- top five  
13 worst congestion problems in Everett in the entire nation,  
14 we absolutely have to have that evaluated before we can  
15 move forward.

16 And the other issue is that noise impact was not  
17 completely evaluated in the EA. The correct evaluation  
18 should have been with an EIS, which would have extended the  
19 evaluation of the noise impact.

20 **P233** SHEPARD CUTLER: My name is Shepard Cutler.  
21 I live at 13420 Bridgeview Way in Mount Vernon. And just  
22 because of the traffic and the tough -- I travel a lot, and  
23 so because of the traffic getting to Sea-Tac, I would  
24 really like to see something happen in Everett. That's it.

25 **P234** CONNIE CHAPMAN: My name is Connie Chapman.

1 So what I wanted to talk about is the potential, the  
2 potential economic impact of the airport on property values  
3 in the area surrounding the airport, particularly north of  
4 the airport over old town Mukilteo, and also that's  
5 considered southwest Everett as well, the area called  
6 Boulevard Bluffs, which is where I live. Those are very,  
7 you know, it's a very expensive view property area. We  
8 happen to have a small house, but there are some million  
9 dollar plus homes there. So this is an area that is going  
10 to deteriorate due to the noise and traffic brought on by  
11 the airport.

12 What is being done to mitigate the property  
13 values decreasing due to the airport? Is there any  
14 compensation that's being considered for homeowners in the  
15 area?

16 I want to make a comment about I think that's it,  
17 you know, kind of interesting and meaningless really that  
18 communities like Lake Stevens are all excited about the  
19 airport. They don't have to pay. They have absolutely  
20 nothing to lose because they're however many miles away.  
21 Those of us who live right around the airport are the ones  
22 who are paying the price both literally and figuratively  
23 for this project, and I don't think that that's fair, and I  
24 that think the residents around the airport should be  
25 compensated in some way.

1           There are a lot of issues about this that I am  
2 not happy about, but that's just one that I'll mention.

3           The other one I'll just mention is the traffic  
4 and I think it's absurd that the assessment says there will  
5 be no impact, when according to their study they're  
6 bringing in over 2,000 vehicles a day. And that's not  
7 going to have an impact in the area? Those of us who live  
8 here will have trouble getting around because of all of the  
9 increased cars.

10           So those are two things and that's what I will  
11 mention today. I appreciate the opportunity to be able to  
12 make my comments.

13           **P235** GUY FLEISCHER: I think the current  
14 environmental assessment is low in scope. I made this  
15 comment before. One of the points I would like to see is  
16 some monitoring program in terms of noise and other issues  
17 related to the current impact statement and a review of  
18 that. That's not -- there is no monitoring and reporting  
19 mechanism in the current document generally as relates to  
20 traffic, increased traffic in terms of automobiles or also  
21 in terms of aircraft numbers and noise generated, radiated  
22 aircraft noise. This is in the event that things change in  
23 terms of the numbers of flights, types of planes used, all  
24 of those things that we can't foresee that probably are  
25 going to happen.

1           So it would be good to have a real in place  
2 monitoring system to allow us to review and see if there is  
3 a need to review our impact statement in the future.

4           That's it. Thank you.

5                       (Public hearing comments ended at 8:30 p.m.)  
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CERTIFICATE

I, KIMBERLY MIFFLIN, a Certified Court Reporter in and for the State of Washington do hereby certify that I reported by stenographic machine shorthand the proceedings hereinbefore contained on the subject matter on the date set forth and that the foregoing 23 pages contain a full, true and correct transcript of said proceedings.

DATED this 6th day of November, 2018.

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KIMBERLY MIFFLIN

CSR No. 2349

AMENDMENT TO THE OPERATIONS SPECIFICATIONS FOR AIR CARRIER  
OPERATIONS AND AMENDMENT TO A PART 139 CERTIFICATE  
FOR THE SNOHOMISH COUNTY AIRPORT/PAINE FIELD  
INDIVIDUAL VERBAL COMMENTS

5:00 p.m.  
Monday, October 29, 2018

Lynnwood Convention Center  
3711 196th Street Southwest  
Lynnwood, Washington

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1           **P236** DI TOWNSAN: Di Townsan, 860 Park Avenue,  
2 Mukilteo, Washington 98275.

3           I read the report very quickly, because I didn't  
4 have much time to explore it, but I disagree with section  
5 5.3.5, migratory birds will not be affected. They are  
6 already affected. I feed birds, and they already will be  
7 affected. We have the Dreamlifter. We have all these  
8 noisy planes come. Every time they come, my birds  
9 disappear. I don't believe that either. And I don't  
10 believe that wetlands that are around there will not be an  
11 effect to the birds.

12           I also wonder what tax breaks are being given to  
13 the airport and the airlines. If there are any tax breaks  
14 it should go to those putting up with the noise that  
15 they're creating and the pollution.

16           And then it says in 6.16.3.3 that there is no  
17 effect on children, and it also says that in section  
18 5.12.2.5 that there is no problem with children. It flies  
19 right over the elementary and junior school. It's so loud.  
20 It's so loud it shakes the windows in my house, and those  
21 are the planes we have already got right now.

22           I already know that it goes over the Montessori  
23 school. These are little children, and they can't protect  
24 themselves against this, and we should do better than that.  
25 The noise is immense right now. And then by accepting the

1 mitigation fees, it says here in the -- any problems with  
2 traffic or noise is going to have to become the city's  
3 problem. So by accepting the mitigation fees -- so for the  
4 123,796.88 the City of Mukilteo is accepting all the  
5 problems that are going to be created by these airlines,  
6 and we can't even afford to fix a road at that price. So  
7 the mitigation is nonsense, and they should never have  
8 agreed to that.

9           And then finally who is paying for the repairs of  
10 this airport? It says here under 6.16.2.1 that there has  
11 been huge electrical, drainage repairs, improvements of the  
12 paving. It's a huge maintenance and repair rehabilitation  
13 problem. And then there's going to be tenant  
14 hangars/building rehab, construction and reconstruction,  
15 all of that crap. Who is going to be paying for that?  
16 Who's responsibility is it going to be to pay for that? Is  
17 that going to be the airlines? Are they going to pay for  
18 that? because I don't think so. They're going to be  
19 tenants, and tenants don't usually pay for improvements. I  
20 think that's going to be passed on to us, and I don't think  
21 it should be. And I don't think we should have any more  
22 taxes, and I don't think there should be any tax breaks  
23 given to the airlines or anybody up here as an incentive  
24 program.

25           They have got plenty at Boeing, and all they have

1 done is screw the people with the noise and the pollution.  
2 And we have got tons of pollution, and it says in this  
3 report that they couldn't even measure some of the  
4 pollution that is going to be the worse pollution because  
5 we don't have measuring devices here. So to say that  
6 that's done, that that means we have no impact does not  
7 mean there is no impact. Just because they couldn't  
8 measure it, doesn't mean there is no impact.

9 **P237** DALE TOWNSAN: Back in '76 I built a house  
10 down in Edmonds, and we shortly thereafter had airplanes  
11 going over our house on takeoff, not landing. And it  
12 became very noisy, and that's when some sort of a statement  
13 was put out that we would not have any future commercial  
14 airplanes at Paine Field. And, of course, that has  
15 changed. So my question is, you know, this is just a  
16 whitewash. If the decisions have already been made, yes,  
17 the runway runs north and south, but the question is where  
18 do they take off and how do they turn; where do they turn  
19 when they come in; where do they come from. And that is  
20 where the noise level will be, not on the runway. So 60/65  
21 four decibels on the runway is nothing. It's when they  
22 take off and lift off like the Dreamlifter right now.

23 I'm in Mukilteo. When that takes off, everyone  
24 turns, and it's just big rumble in the sky. I mean, you  
25 know when the Dreamlifter is lifting up in Mukilteo.

1           So I'm just disappointed in the whole thing. I  
2 believe in the future and all that sort of thing and  
3 helping people and so on, but where you live is something  
4 else too. And so I would like to really know the flight  
5 paths of how these airplanes are taking off and landing as  
6 to where the noise levels will be. That's pretty much it.

7           **P238** ERIN COREY: My name is Erin Corey, and I live  
8 in the City of Lynnwood. And my first question is in  
9 emergency landings I know they dump fuel. Where will they  
10 be dumping this fuel? I want to know if it's in the Puget  
11 Sound or in our neighborhoods and how that is not going to  
12 environmentally impact anything.

13           My second question is I read in the paper 656,000  
14 passengers within five years. Well, that's not 24 round  
15 trips flights a day. So here the reps are telling me or  
16 your technical advisors are telling me that it's only going  
17 to be 24 flights for the next five years. I don't know how  
18 you get to 600,000 passengers with 24 flights.

19           Last question: When it exceeds 24 flights,  
20 because I've been verbally told by these people that it  
21 will not, who do we sue? Propeller, Inc.? The airlines?  
22 Who do we sue? Thank you.

23           **P239** KRISTIN KIRK: This public process has been  
24 flawed from the start. Snohomish County, with undue  
25 deference to business interests over residential

1 communities, approved commercial service at Paine Field.  
2 They gave away a 50-year lease to Propeller for the airport  
3 terminal, which, in essence, gives a subsidy to the  
4 airlines.

5         The extensive negative impact commercial service  
6 will create to nearby homes, schools, churches, and parks  
7 have been completely disregarded. The draft EA should be  
8 revised to include analysis for reasonably foreseeable  
9 potential and future impacts for at least the next 20  
10 years, if not for the entire life of the lease by  
11 Propeller. Otherwise, how will the floodgates be managed?  
12 Who will be watching over the airline companies to hold  
13 them to correct flight limits? At what point will we have  
14 an assurance of good faith by the county, FAA, Propeller,  
15 or the airlines?

16         The draft EA scope and methodology are inadequate.  
17 The 65 DNL is a bad standard, and the FAA knows it. A 50  
18 DNL standard would more appropriately measure impacts for  
19 suburban noise sensitive uses. A revised draft EA should  
20 use sight specific measurement locations for noise  
21 contouring instead of AEDT modelling. Of course, modelling  
22 is cheaper and easier, yet another FAA rule that supports  
23 business over communities, but does the modelling approach  
24 take into account topography, bodies of water, land mass,  
25 and other environmental occurrences specific to our area?

1           At our home we get stereo sound on both sides with  
2 the planes to the east and noise bouncing off Puget Sound  
3 and Whidbey Island to the west. I would like to know what  
4 is the actual methodology for the AEDT modelling. Does it  
5 include natural features and topography, and how far was  
6 that measurement extended?

7           The draft EA, along with this entire process, is  
8 flawed and has been weighted toward business interests from  
9 day one. Before we become Sea-Tac North, the County needs  
10 to withdraw its permit for the terminal, and FAA needs to  
11 be a good broker by requiring a full 20-year EIS to balance  
12 both business interests and the interests the people and  
13 communities impacted, or everyone could cut to the chase  
14 and do what we all know needs to be done. Noise abatement  
15 and flight limits need to be established to mitigate all  
16 current and future impacts of the airport. Homes and  
17 schools will need extensive soundproofing. Nighttime  
18 flights should be eliminated all together. Getting shaken  
19 out of bed by the Dreamlifter between 2:00 a.m. and 4:00  
20 a.m. is bad enough. Adding nine more flights per night is  
21 unacceptable.

22           The developer and airline companies should pay for  
23 the impacts they are creating. We should not have to pay  
24 the bill with lower property values, increased health risk,  
25 and a diminished quality of life.

1           **P240** BOB MAYER: I'm here to express my support for  
2 the final FAA approval of commercial service from Paine  
3 Field. I was born and have lived in Everett all my life.  
4 I'm retired from a 40-year career as an electrical  
5 engineer, which involved frequent air travel through  
6 Sea-Tac Airport.

7           My air travel and retirement is exclusively for  
8 pleasure trips with my family. Due to the deteriorating  
9 experience of traveling between Everett and Sea-Tac, that  
10 part of the trip is no longer a pleasure. Driving to  
11 Sea-Tac to catch a flight is a totally unpredictable  
12 experience that has probably discouraged profitable  
13 job-producing businesses from locating here also.

14           Based on table 3.5 in the September 2018 draft  
15 supplemental environmental assessment, over 650,000  
16 commercial passengers will depart from Paine annually with  
17 approximately the same number arriving. That's over 1.3  
18 million passengers relieved of the stress of commuting to  
19 and from Sea-Tac every year. Taking these passengers off  
20 I-5 is a huge positive result of the proposed action that  
21 the assessment shows has no significant impact.

22           The facility is already built. How many decisions  
23 can yield such a positive result for so many people? We  
24 have been looking forward to commercial passenger service  
25 at Paine Field for decades. It will finally fulfill the

1 original purpose of the superairport when it was built in  
2 the 1930s.

3 We live about three miles from the north end of the  
4 runway, and flights frequently pass over our home. It's  
5 great to know that soon some of those flights will be  
6 carrying commercial passengers. We're looking forward to  
7 joining them.

8 **P241** MIKE MURDOCK: And my comment is that, with  
9 Paine Field opening, there is already overflow traffic from  
10 Sea-Tac. I live in Edmonds, but there's about -- at 10:00,  
11 11 o'clock at night there is already overflow from Sea-Tac  
12 coming over Edmonds, and sometimes it's past 11 o'clock.  
13 And my concern is that, with Paine opening, how is that all  
14 going to work? We already have a lot of air traffic in the  
15 area at the moment.

16 My other question is how are the flights at Paine  
17 going to be diverted or fly when the wind blows at Sea-Tac?  
18 Presently when it flows from the south, they land from the  
19 north, so that brings more flights over south county,  
20 Edmonds, Lynnwood. And how is Paine going to interact with  
21 that? Will they just be landing from the north?

22 And my other question finally is how will that --  
23 is the airport going to close at 10 o'clock? Are they  
24 going to run flights after 10:00, 11:00? And how are the  
25 flights going to take off? In Orange County, for example,

1 they take off, and they don't fly over Newport Beach. Are  
2 they going to have separate flight plans for this to  
3 mitigate noise in the area? So that's pretty much the end  
4 of my report. So I appreciate it.

5 **P242** BRUCE M. MCGOVERN: My basic concerns are  
6 Boeing flies airplanes out of there daily for test flights  
7 right over our house. We live at 176th and 72nd. That's  
8 not that bad, but when you get 24 flights a day, 12 going  
9 and 12 coming, and potentially more, and no way right now  
10 of finding out the outbound routes or the inbound routes,  
11 I'm very concerned about the amount of noise and the  
12 potential for catastrophe. So given Boeing, given all of  
13 the aircraft that come out of there commercial and private  
14 right now and the two Museum of Flight-type situations  
15 where they do fly old fighter planes and old bombers out of  
16 there right over our house, that's a lot of noise.

17 **P243** JIM LANGUS: Jim Langus, 902 Westminster  
18 Circle, Everett, Washington 98203.

19 Here in the past few years, there's been  
20 considerable expert analysis of environmental issues  
21 involving air service. The FAA has been responsible,  
22 thorough, and deliberate in assessing all information. In  
23 2012, an EA was completed, and the FAA issued a FONSI. In  
24 2016, the Ninth Circuit issued a ruling denying a 2013  
25 petition upholding the FAA's decisions. This year the FAA

1 announced the availability of a draft supplemental  
2 environmental assessment. The proposed action in this EA  
3 includes in part the evaluation of scheduled service of up  
4 to 24 daily round trips and evaluation of the three  
5 airlines' operations specifications. Following this FAA  
6 public outreach through November 2nd, the FAA will  
7 apparently continue to review the materials submitted. A  
8 decision may follow, including a determination of the draft  
9 EA under NEPA.

10 I urge the FAA to issue a finding of no significant  
11 impact based on the thoroughness of this environmental  
12 assessment, the scrutiny by the experts who study the  
13 environmental consequences, and the updated information  
14 provide by the air carriers. This draft 2018 EA is  
15 complete with detailed and justification of what is being  
16 proposed. The EA has a very thorough analysis in chapter 6  
17 of the environmental consequences section. The format is  
18 sound and includes, where applicable, an additional  
19 emphasis on the 2019 and 2024 proposed actions.

20 Thanks to the county council and county executive,  
21 Dave Somers' leadership and their ongoing support of air  
22 service. We would not be at this point today if it wasn't  
23 for former airport commissioner Hank Robinett who has  
24 dedicated 30 years to this endeavor.

25 Paine Field is underutilized, and projections will

1 show that air service will not be a large component of  
2 overall airport traffic. Thanks to Propeller for  
3 constructing an extraordinary terminal and an asset that  
4 has been financed privately. Propeller has done everything  
5 that was expected. This is a good example of a public and  
6 private partnership. And recognition to airport leadership  
7 at Paine Field for facilitating all of the steps necessary  
8 and ensuring that commercial air service and the new  
9 terminal are a success.

10 And last, I would like to genuinely give credit to  
11 the FAA and Environmental Science Associates for an  
12 excellent document. This document can stand on its own and  
13 is a good piece of work. The citizens have been well  
14 served by the thoroughness of this draft supplemental  
15 environmental assessment.

16 **P244** BRETT LITTLE: My question is the flight path  
17 for the new airport, is it going to be the same as what  
18 Boeing flies now in and out of Paine Field? And if that's  
19 the case, why can't it follow 525 instead of right over the  
20 city of Lynnwood? The way it is now, they go over the city  
21 and onto I-5. If they were to turn and go up to 525 over a  
22 highway, they could intersect with I-5, which they're doing  
23 now. That's where they're headed. Without going over  
24 residences so much, the noise would be over the highway  
25 rather than the residences in the city of Lynnwood.

1           **P245** DAVE FOWLER: Over the last two years,  
2 thousands of people have decided to move north to the  
3 Marysville area and even further. The consequence has been  
4 a massive gridlock on I-5 southbound starting from 6:00 to  
5 9:00 a.m. and south of Marysville through Everett all the  
6 way down to Seattle lasting from 10:30 to 11:00 a.m.  
7 Highway 99 isn't much help. In the afternoon at 2:30 it  
8 starts to block up from Seattle all the way to north of  
9 Marysville, south of Everett. At 3:00 p.m. it becomes a  
10 virtual parking lot. If the DOT, in all their wisdom,  
11 decides to do a little work trimming or patching the road,  
12 the backup would last even longer. Route 525 does not help  
13 much at all at these times. Now we bring in the traffic  
14 from the ferries through Mukilteo many times a day and late  
15 in the evening, thousands and thousands of passengers. Now  
16 you have the huge Boeing plant, thousands of employees  
17 coming and going at various times.

18           At the present, there is no rapid transit directly  
19 to the Paine Field area. So let me get this right. You  
20 think it's a very smart idea to bring in 24 flights a day  
21 to Paine Field? So let's do the math. 24 flights a day.  
22 It's roughly 200 passengers. And I know here they have 150  
23 passengers, but they're hinting that with Alaska Airlines  
24 that would be a 737, so that would be at least 200  
25 passengers. Even a 150 MD-83 coming and going, that would

1 be 300 passengers coming and going 24 times a day. That's  
2 3,200 passengers coming mostly in their cars, maybe some in  
3 buses. The whole area has changed traffic-wise.

4 The previous studies are obsolete. If you don't  
5 believe me, jump into your car at 7:30 a.m. and head into  
6 Seattle with your driver and see how long it takes you to  
7 get there.

8 **P246** MARILYN BROCK: So I would like to know, if  
9 we're here, why don't we get the new environmental  
10 because here it's stating that the airlines are already  
11 talking about the small airplanes, and they want to change  
12 it to a Douglas, which is louder. So I want to know why we  
13 don't have environmental -- if we're here tonight, we  
14 should have an updated one of 2018.

15 My other question is what guarantee are we having  
16 that the 24 planes taking off -- or 48 -- guarantee that  
17 we're having that that stays in that zone.

18 And my last question is, if I'm being inundated by  
19 noise, what is my resource to get compensation for the  
20 value of my house dropping.

21 **P247** DAN VERHEUL: I'm just happy that you put a  
22 lot information out for the public. I'm concerned that  
23 it's too much information and not enough specificity so  
24 people understand what they're looking at.

25 One of the critical things that people are

1 concerned about is the flight paths of the aircraft and the  
2 altitudes of these aircraft. None of that was shown on the  
3 easels. It is in the diagram, but the diagram on your  
4 study doesn't say what altitude these aircraft are going to  
5 be flying. It also doesn't say what the noise is at those  
6 levels, and most importantly, it doesn't show on the map  
7 where the important public areas are.

8           So where is the school? Where is the reference  
9 point? So people look at the map or the chart, and they  
10 can see where the flight path is in reference to the  
11 Albertson's or the QFC or the middle school or the high  
12 school. That would be very important for the public to  
13 know. I know the information is important to put out, but  
14 it seems like there is a lot of information that just would  
15 confuse most people. Please specify in a little bit more  
16 detail.

17           (Public comments concluded at 6:19 p.m.)

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CERTIFICATE

STATE OF WASHINGTON) ) ss.  
COUNTY OF PIERCE )

I, LINDA M. WARMUTH, a Certified Court Reporter  
In and for the State of Washington do hereby certify that I  
Reported by stenographic machine shorthand the proceedings  
hereinbefore contained on the subject matter on the date  
Set forth and that the foregoing 15 pages contain a full,  
true, and correct transcript of said proceedings.

I further certify that I am in no way related to  
any party to this matter nor to any counsel, nor do I have  
any interest in this matter.

Witness my hand this 8th day of November, 2018.

LINDA M. WARMUTH  
License No. 3080  
Certified Court Reporter in and  
for the State of Washington,  
residing at Tacoma.

AMENDMENT TO THE OPERATIONS SPECIFICATIONS FOR AIR CARRIER  
OPERATIONS AND AMENDMENT TO A PART 139 CERTIFICATE  
FOR THE SNOHOMISH COUNTY AIRPORT/PAINE FIELD  
PUBLIC HEARING VERBAL COMMENTS

6:30 p.m.  
Monday, October 29, 2018

Lynnwood Convention Center  
3711 196th Street Southwest  
Lynnwood, Washington

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1 (Public hearing comments commenced at 6:30 p.m.)

2 SUSAN HAYMAN: Good evening, ladies and  
3 gentlemen. We are just about to begin. Thank you for  
4 being patient. I know some of you have been in the room  
5 for awhile, and we have had some great conversation while  
6 we have been waiting. But before we get into any further  
7 details on my end about the meeting and who I am, I would  
8 like to introduce Steve Alverson. Steve is with  
9 Environmental Science Associates. He is the project  
10 director for this project, and he will be providing some  
11 opening remarks.

12 STEVE ALVERSON: Thank you so much, Susan, and  
13 welcome everyone this evening to our Paine Field EA public  
14 meeting. This is the public hearing portion, and Susan is  
15 going to give you a lot more details. As she said, I'm the  
16 project director for Environmental Science Associates or  
17 ESA, the study team that did the work on the study.

18 My presentation is very brief this evening because  
19 hopefully you have all had a chance to read the boards,  
20 talk with the team members, and get a number of your  
21 questions asked. But I wanted to give just a brief  
22 overview of some of the items that we looked at as part of  
23 this environmental assessment process.

24 The first is, as part of the work that we do, we  
25 have to look at various alternatives to the proposed

1 project or the proposed action, one of which is a no-action  
2 alternative. What if this project didn't happen? What if  
3 the airlines weren't interested, which is clearly a crowd  
4 favorite. So our federal regulations require that we take  
5 that no-action alternative through the whole process and  
6 evaluate that.

7 And then the other is the proposed action, and as  
8 most of you know and the reason you're probably here  
9 tonight is that Alaska, United, and Southwest Airlines are  
10 interested in providing scheduled commercial service at  
11 Paine Field of up to 24 round trip domestic daily flights  
12 using an Embraer 175 aircraft. That's a regional jet  
13 aircraft and then the Boeing 737 aircraft or what we often  
14 call a mainline air carrier/aircraft, both quite a bit  
15 smaller than the current aircraft that are being  
16 manufactured by Boeing at the facility right now at Paine  
17 Field.

18 The alternatives that we considered that I  
19 dismissed from further evaluation included the use of other  
20 airports, the reason being is that the airlines see a need  
21 or demand for service at Paine Field. They want to fulfill  
22 that demand, and the FAA in its role as the federal  
23 oversight agency doesn't have the ability to influence or  
24 deny the airlines the ability to operate at Paine Field, as  
25 long as the facilities are there for them to do that and as

1 long as it's safe for the aircraft to do that. And the  
2 other, which is why not use other aircraft or different  
3 aircraft? In the same vein, it's the airlines that choose  
4 the aircraft to meet passenger demand at the facilities  
5 that they serve, and the FAA doesn't have the ability to  
6 dictate which aircraft types they can and can't use,  
7 again, as long as those aircraft can be safely accommodated  
8 at the facility.

9           The proposed action is a little bit more detailed  
10 than this particular slide here. So who is the decision  
11 maker in this process? It's the Federal Aviation  
12 Administration. They are looking at several of these  
13 changes that are discussed within the environmental  
14 assessment, one of which is an airport (inaudible) plan  
15 change, an operations specification change, as well as the  
16 Part 39 certificate.

17           The airport sponsor is Snohomish County  
18 Airport/Paine Field, and the project proponents are the  
19 three airlines I have mentioned: Alaska, United, and  
20 Southwest.

21           What is the action that is potentially considered  
22 here? Early in 2019, the airlines would like to start our  
23 service at the airport. That would be scheduled commercial  
24 service of up to 24 daily round trips, domestic flights.  
25 And, again, a round trip is one landing and one takeoff, so

1 we're talking about 48 operations per day.

2 Aircraft types are the Embraer 175, which you can  
3 see in the image there on the upper right-hand side, and  
4 the Boeing 737. We also show a couple of the aircraft  
5 types that currently operate at Paine Field there,  
6 including the Triple 7 and 747.

7 The regulatory activity would be to amend Paine  
8 Field's Part 139 operations certificate. A 139 certificate  
9 is to allow commercial operations at the airfield.

10 And there would be minimal construction. All the  
11 existing facilities are there already. There will be a  
12 re-marking of current pavement that's there re-striped for  
13 public vehicle parking, basically for passengers dropping  
14 off and picking up. And there is also a navigational link  
15 called Segmented Circle that allows pilots to see the way  
16 in which the wind is blowing at the airport and what are  
17 the traffic patterns happening at the airport. That would  
18 be put in place as well. But no ground disturbances, no  
19 impervious surfaces.

20 The operations that you can see there, I have got a  
21 number of questions about this particular graph that was at  
22 my station. On your left-hand side are the number of  
23 aircraft operations per year, and on the right-hand side  
24 are the number of planes, passengers getting onto an  
25 aircraft. It shows some of the actual operations from 2008

1 and 2013 and how they declined slightly over time. 2017 as  
2 well. And then our forecast that we prepared for the EA as  
3 what we see the operations being for the balance here. And  
4 then with the new service being introduced, you can see the  
5 enplanements picking up there once the air service was  
6 introduced, if in fact that would be approved as part of  
7 this process.

8 So what did we look at in the environmental  
9 assessment? We have a variety of environmental resource  
10 categories that we need to look at. We are required by the  
11 National Environmental Policy Act to take a look at these  
12 particular categories. Air quality and climate, biological  
13 resources. Coastal resources of course fall out of this EA  
14 because there are no coastal resources near the airfield.  
15 Department of Transportation 4(f) activity, hazardous  
16 materials, and you can see down the list what we look at.

17 Of course, some of the areas that are of greatest  
18 interest are the noise and land use as a part of this  
19 particular activity as well as the air quality aspects of  
20 this project. We need to look at those in great detail,  
21 provide quantification, and put that into the environmental  
22 assessment for not only other agencies that are out there  
23 to take a look at but for you as the public to assess and  
24 take a look at and then provide comment on that as well.

25 We'll take a look at those comments. We'll respond

1 to those comments as a part of this process, address those  
2 questions and concerns, and ultimately incorporate that  
3 into the final environmental assessment, which the FAA will  
4 then have to make a determination on how it would move  
5 forward at that point in time.

6 With that, it's a very brief overview of the  
7 project, but this is your time from this point on, and I  
8 will turn it back to Susan, who will be our facilitator for  
9 this evening.

10 SUSAN HAYMAN: Well, thank you again. It's  
11 really a pleasure to be here this evening. My name is  
12 Susan Hayman. I'm with a company called EnviroIssues. So  
13 I am part of the overall consultant group here, myself and  
14 the folks that helped you sign in and who you interacted  
15 with. We're really a public involvement firm, so we're  
16 here to try to ensure that you have every opportunity to  
17 make those comments that you want to make this evening.

18 And so as the facilitator for this evening, my goal  
19 is try to give as many of you the opportunity to make a  
20 comment this evening and also to try to keep the room and  
21 the audience and just the overall atmosphere here  
22 comfortable for everybody to be able to come up here in  
23 front of a mike and provide their comment.

24 So a couple of people I want to introduce you to.  
25 Well, actually, most importantly right now is Diana. Diana

1 is putting up names here. This is a speakers queue is what  
2 we're calling it. It's really a fancy name to say this is  
3 who will be speaking in the order they will be speaking.

4 If you are in one of those first -- it's not actually  
5 showing the first five specifically, but if you count  
6 yourself down and you're in that first group of five, I'm  
7 going to ask you if you would come sit in the chairs that  
8 are numbered one through five. And then as people speak,  
9 we'll be able to click down, and you'll see that, as people  
10 speak, we will note that they have spoken. And then we'll  
11 click it down, and you'll be able to track when you are  
12 going to be providing testimony.

13 Those of you who are speaking want to be facing the  
14 audience tonight, and I want you to know that there are  
15 people from the Federal Aviation Administration here as  
16 well as folks here from the ESA and others in the study  
17 team. So particularly I want to introduce Cayla Morgan,  
18 Janelle Garillo (phonetic) and Jason Ritchie from FAA.  
19 They are seated in the second row here. So they will be  
20 listening to your comments as well. Steve Alverson, who  
21 you have met, and Autumn Ward, who is the project manager.  
22 So those folks are going to be here. Other study team  
23 members are here. And please know that, as you're  
24 speaking, they are listening to what you have to say.

25 There is also a court reporter in the room over

1 here, and so she'll be capturing your comments. She is  
2 going to do her best to get those verbatim. If you can  
3 help us if you are speaking just to speak at a reasonable  
4 pace, maybe something not unlike what I am doing right now,  
5 that would be helpful. And if you are reading comments, it  
6 would be especially helpful if you could provide us a copy  
7 of those comments or let us take a picture of your comments  
8 and then that way we can just compare and make sure that we  
9 get a good record of what you're saying.

10 (No records available to compare)

11 I mentioned before that we do have another court  
12 reporter who will be out in the room just through the doors  
13 and around the corner. So if you find that you're not able  
14 to wait until your speaker time comes up, because we will  
15 be going in the order that you signed up, we'll be happy to  
16 take your comment there. Or if you just decide you would  
17 rather do it that way, that is fine. If you decide that,  
18 when I call your name and if you're still in the room or if  
19 you just decide you don't want to speak, if you could just  
20 let me know, and then we'll just put a line through that.  
21 If you don't let me know, then you'll get to have me call  
22 your name a second time, which is perfectly fine. But just  
23 so that you know, that is how that is going to work  
24 tonight.

25 The other thing I wanted to mention is that we have

1 a comment table out in the other room, and I saw a number  
2 of you taking advantage of that. We have a comment form  
3 that's been provided by the project. You're also welcome  
4 to provide your own paper, or if you came with comments,  
5 you're welcome to leave those. Those are on the back of  
6 this little information form that we have here this  
7 evening. Again, you can continue to make comments out  
8 there as long as we are here tonight, and all of the  
9 comments have equal weight as far as how they're being  
10 considered. So whether you speak the comment, whether you  
11 write a comment, however you do it, whether you're inside  
12 the room or outside the room, they're all going to count  
13 the same. So please don't be concerned that you are  
14 disadvantaged by providing a comment one way or the other.

15 So again, let me just reinforce how this works. I  
16 have five very cooperative people who are already up here.  
17 So when I call you up, I'll have you come up to the mike.

18 I'm going to ask a question real quick here about  
19 time. We have about 25 or so people signed up, so we were  
20 planning on two minutes. If we go three minutes, then that  
21 will probably fill or get close to filling the time we had,  
22 and we may have additional sign-up. So what do you want to  
23 do, FAA? Do you want me to go two minutes or three  
24 minutes?

25 (FAA responds)

1           You want to go three minutes? Okay. So we should  
2 have plenty of time to get all of the folks that are  
3 already signed up, and we probably have a little bit of  
4 room if there are additional ones of you who, when you see  
5 this happen, say I actually want to do that too. Then if  
6 you could just go out into the hall and get signed up, and  
7 then we'll get you on our list. If we end up with too many  
8 people, we'll see what happens with that. We also again  
9 have the court reporter outside. You will always have a  
10 good 20 minutes before it is your time to speak once you  
11 see your name up there. So you just want to be sure that  
12 you are in this room when we call your name, and you should  
13 have plenty of time if you need to step out or get water at  
14 one of these stations. We should be able to cover you.

15           So you'll have three minutes up here. This will be  
16 your one turn to get up here and speak. I want to be sure  
17 to mention that. Your comments will be most helpful. If  
18 they're focused on potentially affected resources, extent  
19 of the study, the analysis contained in the draft  
20 environment assessment, and mitigation or ways to avoid  
21 impacts, any of those specifics, and Steve mentioned those  
22 as well, it would be very helpful to have in your comments  
23 tonight. You don't need to state or spell your name when  
24 your start because we have your name in the sign-up. So no  
25 worries about doing that.

1 I mentioned that one of my important jobs is not  
2 only to ensure that we get as many people through but that  
3 we maintain a good, courteous, and pleasant atmosphere for  
4 us to all make comments tonight. So to that end, I'm going  
5 to ask you to please be respectful to other people who have  
6 different views than you do. If somebody gets up here and  
7 says something that really resonates with you, instead of  
8 clapping, if you would just raise your hand, they'll see  
9 you, and they'll feel that support. But if you clap, then  
10 we have to slow down and wait for that to end before we can  
11 keep going. So if you can hold your applause, show your  
12 support by raising your hands and then putting your hands  
13 down, then I think we'll be in great shape.

14 I think that is all of the comments or instructions  
15 that I have this evening. So I think with that, we'll have  
16 our first speaker come up.

17 **P248** DOM AMOR: My name is Dom Amor. I'm a  
18 resident of Mukilteo. I live on 92nd Street Southwest,  
19 which saddles the west side of the airport. I have lived  
20 in this region for almost 40 years, and one thing that I  
21 can honestly say is that I have seen a lot of changes in  
22 many parts of Puget Sound. This airport really opens up a  
23 whole new opportunity for the region, for the state, and I  
24 really think that it is a very unique opportunity for  
25 growth.

1           With many of the things that this area is going  
2 through and will continue to go through, we cannot avoid  
3 change, and this is something that we can actually embrace  
4 and work very well with.

5           Some of the direct impacts are going to be some of  
6 the visitor spending that will stem from the activities of  
7 aircraft operations. Some of the indirect impacts are  
8 going to be some of the business transactions that occur in  
9 off-port areas, also made by airport tenants and the  
10 airport dependent businesses, and some of the induced  
11 impacts that will be realized when workers employed at the  
12 airports or whose jobs are supported by those businesses  
13 that serve visitors or airport dependent businesses spend  
14 their earnings in the local communities. So this will  
15 really be an opportunity to really grow the region.

16           Likewise, it will also help to connect the region  
17 to other parts that we are going to be more and more  
18 dependent upon, areas outside of the state as well as  
19 internationally. So with that, I am in total support of  
20 the airport and the commercial service that will be  
21 conducted through the airport, and I look forward to seeing  
22 the economic impacts really support the region.

23           **P249** DAVID FOWLER: I'm David Fowler, and I think  
24 this is one of the dumbest ideas to come down the pike.  
25 Thank you. Wow, I have a lot of friends here.

1 I don't know what business Dom is in, but I don't  
2 think he drives his car around the place much. My problem  
3 is with the traffic, the impact on vehicle traffic in the  
4 area. We all know it's ridiculous. We all know it's a  
5 parking lot going north, and it's a parking lot going south  
6 an easy eight hours a day. And to have this proposal and  
7 to bring in -- let's see -- 24 flights, 200-plus  
8 passengers, 737s, and you're kidding yourself if you think  
9 it's not going to be 737s. That's 24 times loading and  
10 unloading. That's 400 passengers. It's 9,600 passengers a  
11 day. 9,600 a day. Now, how many are coming in cars? How  
12 many are coming in cabs, buses? So let's be nice. Let's  
13 say 3,200 cars out of the 9,600 are going to impact the  
14 area. Okay. Now this is an environmental impact. The  
15 greatest impact on our environment has been these damn  
16 vehicles, okay? The buses, the cars, airplanes, all this.  
17 And to increase that impact by 3,200 additional cars along  
18 with the ferry traffic...

19 I talked to a very nice young man, a traffic guy,  
20 and I said, Do you know how many cars are coming on and  
21 going off that ferry? Well, no, but we have a traffic  
22 thing. I think maybe he used a slide rule or something.  
23 So the ferry traffic is not taken into account. Boeing  
24 employees are not truly taken into account. So I think as  
25 far as the environment is concerned, this would be a

1 horrible, horrible impact on it. Thank you very much.

2 **P250** STEVE TOLKFSON: Hello. My name is Steve  
3 Tolkfson. I live in a place called Whidbey Island, so I'm  
4 one of your silent neighbors. I direct this primarily to  
5 the FAA, my comments tonight, and also to Steve and the ESA  
6 folks with your study, because I feel that if I talk like  
7 the FAA talks when there is an aircraft accident, they  
8 sometimes say it's errors of omission. The pilot did  
9 something wrong, didn't follow the checklist.

10 I feel that there is a checklist here that wasn't  
11 followed. There are communities five miles to the west  
12 that may have vectors that you FAA folks are now proposing  
13 to direct aircraft over our island. And no one asked us  
14 where are our hospitals, where are our schools, where are  
15 the children that the study said that you wanted to  
16 protect. So I direct this to the FAA. I direct it to ESA  
17 that I would like you to work with me and my fellow Whidbey  
18 Islander over there to come to some kind of understanding  
19 on how are you going to communicate to us that it's going  
20 to be safe.

21 I understand 24 flights a day isn't a lot, but what  
22 happens 10 years, 20 years down the line? I used to live  
23 in Woodinville, and the aircraft noise coming from Seattle  
24 28 miles away began to really bug me to the point where I  
25 did move to Whidbey Island for the quiet.

1           And that's what I'm looking for now is your noise  
2 studies didn't go far enough. There were errors of  
3 omission, and I would like you to correct that by working  
4 with us. There are 65,000 of us that live on Whidbey  
5 Island, and not one of us was asked, well, what do you  
6 think?

7           I support the fact that it's going to be easier to  
8 get over to the airport and fly places, and I love the fact  
9 that we're using quiet airplanes. If you go to the north,  
10 the Whidbey Naval Air Station has those Growlers. They're  
11 bad, and I feel sorry for anyone that has to put up with  
12 it. But I also didn't move to Whidbey Island with the  
13 anticipation that I was going to have more and more air  
14 traffic coming over my house, especially if the FAA says to  
15 a pilot we want to vector you over Whidbey Island.

16           So please take my name. Work with me, and I will  
17 also work with our Island County Commissioner to make sure  
18 that we are now in the loop so everyone can kind of hear  
19 our voice as well. Thank you.

20           SUSAN HAYMAN: Thank you, sir. I just want to  
21 mention again I really appreciate specificity of comments.  
22 Please let's not name names of people. Let's keep the  
23 comments to the analysis and again try to have that good,  
24 constructive, courteous atmosphere here. Let's not bring  
25 people into this by name.

1           **P251**   BRIAN KERK:   Good evening.   The current  
2 environmental assessment is insufficient because it uses 65  
3 decibel data to assess noise impacts rather than the noise  
4 levels more appropriate to the area such as 50 or 55 DNL.  
5 The AEDT model should be rerun for 50 or 55 DNL for the  
6 final environmental assessment, and the FAA and Snohomish  
7 County should base any decisions and requirements for  
8 mitigations on this more appropriate noise level curve.

9           While 65 DNL is the minimum noise level required by  
10 the FAA in 14 CFR 150, the FAA also encourages  
11 jurisdictions to take a more comprehensive approach to  
12 noise exposure below 65 DNL per the Aviation Noise  
13 Abatement Policy 2000.

14           The 65 DNL standard is problematic for a number of  
15 significant reasons.   The Schultz curve which established  
16 the 65 DNL was based on a single study from the 1970s.   The  
17 study was controversial when it was published and has since  
18 been superseded by a more comprehensive research.   At best,  
19 it is a subjective predictor of how many people will be  
20 highly annoyed by transportation noise, which includes  
21 airplanes, highway noise, and trains.   It does not include  
22 specific events such as interruptions of sleep or outside  
23 activities.

24           The Washington State Department of Transportation  
25 guides for airports and compatible land use documents

1 additional issues. The Schultz curve was developed for a  
2 noisy urban environment, not for quieter communities.  
3 Aircraft noise events are intrusive, disruptive, and can  
4 cause conflict. Rather than being similar to an ordinary  
5 conversation, as cited in the draft environmental  
6 assessment, Washington State DOT guides found airplane  
7 noise comparable to a power tool such as a chain saw.

8         Allowing the airlines to only model the 65 DNL  
9 curve for an assessment of noise impacts is inappropriate  
10 to Paine Field's location adjacent to quiet residential  
11 neighborhoods, schools, and parks. The FAA should require  
12 the airlines to produce noise assessment curves suitable to  
13 the location such as 50 or 55 DNL. Selection of the  
14 appropriate sound levels should be done through  
15 consultation with state, county, city, and tribal  
16 governments. The results of the modelling should be  
17 included in the final environmental assessment. The FAA  
18 and Snohomish County should base any decisions and  
19 negotiations and mitigations on the updated assessment of  
20 noise impacts. Thank you.

21         **P252** JIM LANGUS: Jim Langus. During the past few  
22 years, there has been considerable expert analysis of  
23 environmental issues involving air service. The FAA has  
24 been responsible, thorough, and deliberate in assessing all  
25 of the information. In 2012, an EA was completed, and the

1 FAA should have a finding of no significant impact. In  
2 2016, the Ninth Circuit issued a ruling denying a 2013  
3 petition upholding the FAA's decisions.

4 This year the FAA announced the availability of a  
5 draft supplemental EA. The proposed action in this EA  
6 includes, in part, the evaluation of scheduled service of  
7 up to 24 daily round trips and evaluation of the three  
8 airlines' operations specifications.

9 Following this FAA public outreach through November  
10 2nd, the FAA will continue to review the materials  
11 submitted. The decision may follow, including a  
12 determination of the draft EA under NEPA. I urge the FAA  
13 to issue a FONSI based on the thoroughness of this EA and  
14 scrutiny by the experts who study the environmental  
15 consequences and the updated information provided by the  
16 airlines. This draft EA is complete with detail and  
17 justification of what is being proposed. The EA has a very  
18 thorough analysis in chapter 6 of the environmental  
19 consequences. The format is sound and includes where  
20 applicable an additional emphasis on the 2019 and 2024  
21 proposed actions.

22 Thanks to the county council and County Executive  
23 Davis Somers' leadership and their ongoing support for air  
24 service. We would not be at this point today if it weren't  
25 for former airport commissioner Hank Robinett who dedicated

1 30 years to this endeavor. Paine Field is underutilized,  
2 and projections will show that air service will not be a  
3 large component of overall airport traffic.

4 In closing, thanks to Propeller for constructing an  
5 extraordinary terminal and an asset that has been financed  
6 privately. Propeller has done everything that was  
7 expected. This is a good example of a public and private  
8 partnership. And recognition to airport leadership at  
9 Paine Field for facilitating all of the steps necessary in  
10 ensuring that commercial air service and the terminal are a  
11 success.

12 And, last, I would genuinely like to give credit to  
13 the FAA and Environmental Science Associates for an  
14 excellent document. This document can stand on its own and  
15 is a good piece of work. The citizens have been well  
16 served by the thoroughness of this draft supplemental  
17 environmental assessment. Thank you.

18 **P253** DI TOWNSAN: From my own experience of reading  
19 this report, I disagree. I don't think it has represented  
20 the environment. It's not a good scientific report. It  
21 seems like a whitewash to me. It didn't ask any of us.  
22 We're the environment, aren't we? Aren't we part of the  
23 environment? They didn't ask me how this was going to  
24 impact me or how it's going to impact my life.

25 And I will tell you it's not supposed to impact the

1 parks nearby. It sure does. I don't go to them anymore.  
2 It's too noisy there. I can't take it. And it says no  
3 impact to children. They're abutting the field, the junior  
4 high and the elementary school, the youngest children, the  
5 best ears, they're going to ruin them.

6 And air quality control. Air quality control  
7 things sucked. I mean, excuse me. It didn't make any  
8 sense to me because I looked at their report, and they even  
9 said that they didn't test this because they didn't have  
10 adequate sensors in the area. They're using data from  
11 South Seattle to base their report on. That's not right.

12 And when I talked to the guy out there, he said,  
13 well, that I was mixing up apples and oranges, because they  
14 were presenting what the emissions would be. And I said,  
15 Don't we need to know where we're starting from? They  
16 didn't test that, did they?

17 I asked the traffic guy. He said the only thing  
18 they evaluated were streets that had intersections, because  
19 they only counted the cars at intersections. I said: How  
20 does that reflect all the traffic that's on the Mukilteo  
21 Speedway, the effect of Boeing when they let their people  
22 out, how that affects I-5? And they didn't evaluate I-5  
23 either. We all know that's a parking lot after 1:00 p.m.,  
24 so how are those people going to get to the airport when  
25 they can't even get off I-5? If they had just come and

1 asked us, we could say: Go look at this; go look at that.  
2 We all know what the traffic issues are.

3 And then the greenhouse gases, it says here that  
4 currently in '17 we have 120,000 plus metric tons of  
5 greenhouse gases caused by what we already have. So we're  
6 going to add to that? I just don't get it. I don't get  
7 this at all. I'm pretty stupid, I guess. I don't  
8 understand it.

9 And then also it says it's not supposed to mess  
10 with my migratory birds. I'm telling you, I'm a birder. I  
11 don't see my birds anymore. We have all these noisy  
12 airplanes like the Dreamlifter. When it goes over and I'm  
13 shopping at QFC, you think the world is coming to an end.

14 So I don't think this is the answer, and I don't  
15 think -- and then who the heck is paying for all of this?  
16 Who is going to pay for the maintenance of this thing? I  
17 bet it isn't going to be the airlines. They're going to  
18 take the position -- I do have one more thing. The  
19 mitigation fees. I'm not a legal man, so I don't know, but  
20 from reading this it sounds like they paid us a pittance of  
21 a mitigation fee to Mukilteo, and in doing so, it makes it  
22 so they're not responsible for solving the noise and the  
23 traffic pollution problems they're going to create. That's  
24 now up to the city, and we all know how good the city  
25 resolves those problems, don't we? Woo-hoo. That's all I

1 have to say. Thank you very much.

2 **P254** GLEN BACHMAN: I have lived here for over 21  
3 years and from the very beginning have been a proponent for  
4 the airport and worked diligently to bring it on. This is  
5 absolutely a gift to Snohomish County. This has been an  
6 overdelivery of what we expected, far above anything that  
7 we could ever imagine, and the future will tell us and show  
8 to us that the uniqueness of Snohomish County will be  
9 spelled out and be evident as we go forth year over year.

10 I am a member of a number of boards, both public  
11 and nonprofit, and each and every one of them will be  
12 positively affected by the launch and the service at Paine  
13 Field. Again, and like other speakers have said, thank you  
14 and hats off to Propeller for their sticking to this and  
15 for their personal investment and time for this overall.

16 And, yes, where I live, the aircraft do fly  
17 overhead. I enjoy it. The noisiest thing is actually  
18 helicopters because they fly so low. Everything else is up  
19 and out of the way. And we should be welcoming each and  
20 every one of the thousands of passengers that are coming in  
21 because each one of them is going to bring in new dollars  
22 to us. And the economy for this county will be -- will  
23 appreciate it, and we'll see it be rewarded. Thank you.

24 **P255** SID HORVATH: My name is Sid Horvath. I'm a  
25 Lynnwood resident. I live off the Olympic View Drive area.

1 I do appreciate all the efforts everybody has made  
2 with this environmental survey. However, as a resident in  
3 the area that's going to be affected, I do frequently get  
4 waken up by the large jets. We do have a lot of traffic in  
5 the airways currently with helicopters and small planes  
6 privately piloted. So even though a lot of those great  
7 scientific numbers are listed on the report, personally it  
8 does affect me in a derogatory manner, and I do get woken  
9 up in the middle of the night from a deep sleep. I do get  
10 interrupted when I'm out mowing my lawn or performing  
11 activities around my house.

12 So I don't feel that increasing the air traffic  
13 will benefit me or my neighbors, who will also complain  
14 about the air traffic. Thank you very much.

15 **P256** KEVIN STOLZ: I deliberately moved to Mukilteo  
16 in 1983 and went to work for Boeing in Everett as an  
17 aeronautical engineer. One of the jobs I had while working  
18 at Boeing was as a noise staff engineer. I earned my  
19 pilot's license at Paine. We raised our son and daughter  
20 in Mukilteo. We have lived in Mukilteo for the last 35  
21 years, the last 14 of which have been in Old Town near the  
22 Mukilteo ferry. Only the past couple of years we have  
23 experienced noise from nighttime Dreamlifter flights that  
24 not only abruptly wake us up while sleeping, but, as my  
25 wife Dana describes, literally shakes us awake.

1           Our bedroom is on the second floor of our home with  
2 the window facing north, which is the approach for Paine  
3 runway 16 right. Measured nighttime ambient noise levels  
4 at our house are 30 to 32 DBA. Measured noise levels at  
5 our house for Dreamlifter arrivals are typically 70 to 75  
6 DBA and departures are 75 to 80 DBA, unless they turn out  
7 early, in which case, they are significantly higher earning  
8 the "shakes us awake" title.

9           Based on our current experience with the nighttime  
10 Dreamlifter flights that occur on average once every three  
11 days, we fear the projected 4.5 scheduled commercial air  
12 service nighttime flights will force us to move. We're  
13 already contemplating needing to move due to the  
14 Dreamlifter flights but are hopeful Boeing will curtail its  
15 evening Dreamlifter flights.

16           At a recent Paine Field Community Council Meeting  
17 -- and I'm told that this is not correct -- airport staff  
18 told us the scheduled commercial air service flights would  
19 start as early as 5:00 a.m. and run as late as midnight.  
20 That only leaves us a five-hour block for sleep, and  
21 combined with the random nature of the nighttime  
22 Dreamlifter flights, we will be forced to move.

23           Granted, the nighttime Dreamlifter flights tend to  
24 come in bursts. They are unscheduled. For example, just  
25 this past Saturday early morning there were two Dreamlifter

1 flights that came in and departed at 1:12 a.m., 3:31 a.m.,  
2 4:54 p.m., and 6:57 a.m. And that's a Saturday morning.  
3 And this is the type of thing that happens all the time.

4 The 1990 Airport Noise and Capacity Act prevents  
5 local jurisdictions from imposing nighttime curfews on  
6 aircraft flights. However, it also has provisions that  
7 allow voluntary curfews to be imposed. I believe this  
8 option should be spelled out in the environmental  
9 assessment to encourage the aircraft operators and our  
10 elected officials to work together to mitigate the adverse  
11 noise impacts that some of us are already experiencing.

12 **P257** POLAGAGA MCLAUGHLIN: Hello. My name is  
13 Polagaga McLaughlin. I'm president of Local 109 of the  
14 American Federation of State, County, and Municipal  
15 employees. I'm here speaking on behalf of the maintenance  
16 workers at Paine Field.

17 Among other work, these workers are the ones  
18 responsible for keeping the runways painted, clear of  
19 debris, and in good order, clearing snow, placing de-icer,  
20 and seeing that the runway lights are in proper operating  
21 order.

22 I'm speaking to the socioeconomic aspect of the EAS  
23 in that it concerns the safety of the workers at the  
24 airport. We have two grave safety concerns that we believe  
25 have not been addressed with the addition of more service.

1 First, it is my understanding the tower will not be  
2 staffed 24/7, yet the airport remains a general service  
3 airport. This means that, besides commercial services,  
4 small planes use the runway and Boeing brings in large  
5 planes for repair and maintenance and test flights. The  
6 runway needs to be swept clean of debris, and the sweeping  
7 needs to take place when the runway is quiet. The new work  
8 window is very narrow, and it will now be at night when the  
9 tower is closed. Planes are allowed to land then without  
10 an okay from the tower and without an announcement.

11 Our workers have radios, and they monitor the  
12 runway. They monitor for landing announcements. They have  
13 already had several near misses working on the runway when  
14 approaching planes did not announce they were landing. At  
15 night workers cannot even see the planes approaching so  
16 that they can get off the runway. We believe this is an  
17 accident waiting to happen. It endangers not only our  
18 workers but the occupants of the planes as well.

19 Second, an increase in plane traffic means an  
20 increase in debris on the runway. At the same time, an  
21 increase in plane traffic narrows the window in which our  
22 workers can be on the runway to clear the debris.

23 Debris left on the runway can be expensive if it  
24 damages the planes, but it can also be deadly. We greatly  
25 fear that current staffing plans do not cover the

1 additional workload to adequately keep the runway safe. We  
2 ask that both these safety concerns be addressed before  
3 moving forward with additional flights.

4 **P258** LES NELSON: Les Nelson, Mukilteo resident.  
5 The environmental assessment is not complete. It falls  
6 short in the areas that are really affected. It shows a 65  
7 decibel contour, which is really just on the airport  
8 runway, and it really doesn't show how that affects other  
9 areas. And what I found out tonight is that the 65  
10 decibels is an average only. It isn't what we really hear.  
11 We hear the noise spikes. We hear each individual  
12 aircraft. That's what wakes us up at night, not the  
13 average. The other issue I have with choosing that is the  
14 study area, and they're making that 65 decibels as a limit  
15 of the study area.

16 It doesn't talk about other environmental issues  
17 with the drainage basins that leave the airport, Japanese  
18 Gulch. It doesn't talk about fuel jettisoning. If an  
19 airplane is in trouble and they come back to the airport,  
20 they dump all their fuel. It's a common practice for  
21 aircraft. It's called fuel jettison. And that means that  
22 that is going to affect environmental areas like Japanese  
23 Gulch or Big Gulch or any of those where the fuel dumps.  
24 And of course it isn't talked about, because the  
25 environmental assessment only talks about the little area

1 around the airport, because that's where the 65 decibel  
2 average was taken, not the numbers that we are actually  
3 seeing on the ground.

4 When that Dreamlifter takes off, we feel it. It  
5 shakes the house. Things rattle. So we always wake up,  
6 sometimes in the middle of the night, fearful that it's  
7 coming in through a window. You don't know. But it's  
8 pretty loud. So those are the kind of things that we  
9 really see on the ground and things that I feel should be  
10 taken account of in the environmental assessment. Thank  
11 you.

12 **P259** MIKE MOORE: Mike Moore, resident of Mukilteo,  
13 president of Save Our Communities.

14 This is a little bit like déjà vu all over again.  
15 We have been through this process before with the  
16 environmental assessment. Our concern was then that they  
17 didn't study enough flights. And if you recall, in year  
18 one, in the last environmental assessment, the number of  
19 flights studied was six a day. We said there was going to  
20 be more flights; you need to study more than that, and now  
21 here we are studying 24 flights a day.

22 Some folks are concerned about one flight. Some  
23 folks are concerned about the incremental increase of  
24 flights over time. That's what I personally am concerned  
25 about is that it's going to increase over time and you will

1 incrementally study another five flights and say no  
2 significant impact, another five flights, no significant  
3 impact. And it's death by a thousand cuts, and that's what  
4 people are concerned about.

5 That's is a lot of certainty over this whole  
6 process when it seems to be gamed to lowball the entire set  
7 of impacts. I have been involved in a lot of environmental  
8 assessments, EISs, and categorical exclusions as a  
9 regulator in the government and now in my private job.  
10 EISs now are much more comprehensive environmental impact  
11 statements. Much more comprehensive. They require a  
12 publicly scoped process. Didn't have that here.

13 You have a lot of good input here today that you  
14 could have benefitted from had you talked to the citizens  
15 before you scoped this project, and then, secondly, you'd  
16 have a much more comprehensive review. And that's what was  
17 required here. That's what should have been required here.

18 Honestly it's unbelievable to think that you could  
19 turn an airport into a commercial service airport and  
20 skinny up the assessment by going to an EA. We really  
21 needed an EIS. We need to move on to a comprehensive  
22 assessment. And if we did an EIS, I think we would have  
23 more opportunity to provide that input.

24 And really this whole cumulative impact is really  
25 what is concerning, and we haven't addressed that. I have

1 got a couple of questions here as samples of what we are  
2 going to be submitting later this week. Had does this  
3 approach, quote, facilitate, and encourage public  
4 involvement, which is a requirement by your law and your  
5 own policies? You know, zero input by the public when the  
6 scope was studied and limited to a 30-day comment period  
7 isn't it, one public hearing. Why does the FAA average  
8 noise over 24 hours when efforts to save the Orcas include  
9 noise mitigation in realtime? Why can't we be treated the  
10 same as Orcas?

11 The Seattle Times yesterday just posted this  
12 traffic noise article. What does it say? It says those  
13 promised relief never got that relief. This is the kind of  
14 concern people have, except we're not going to have any  
15 mitigation, and the mitigation is going to be paid for by  
16 the citizens and not by the airlines or Propeller. And  
17 that's the biggest concern we have.

18 Last thing, a few more questions here: How can you  
19 conclude that adding 12 million more local miles travelled  
20 with over 2,100 more car trips will produce no significant  
21 impacts? It defies logic. Why aren't decreasing home  
22 values a significant issue? Apparently it's only  
23 insignificant if it doesn't impact you. How can your five  
24 activity be the same as your one activity? You accounted  
25 for no growth whatsoever, yet in this study, they say that

1 you could have three planes at a time concurrently, not  
2 just two. It seems like you ought to look at the maximum  
3 potential of what's being proposed.

4 So we request that you amend the supplemental EA to  
5 include reasonably foreseeable activity levels to address  
6 cumulative impacts. And "no cumulatives impacts" is a  
7 bugaboo with FAA and the consultants because you don't know  
8 how to deal with it.

9 And then lastly we request that mitigation options  
10 be specifically listed for all the impacts to include  
11 things like flight paths over high ambient noise corridors  
12 instead of neighborhoods, time of day agreements with  
13 airlines, noise abatement programs, traffic mitigation  
14 funding. That's not just 673,000 and you're done.

15 **P260** WILLIAM LIDER: I'm Bill Lider. I represent  
16 the Sno-King Watershed Council. On a personal note, I  
17 moved to Washington state in 1978, having lived under the  
18 glide path of an airport previously. I looked at the map  
19 and said where is the airport. It's down in Sea-Tac, and  
20 we decided to move to Snohomish County. That's how I ended  
21 up here.

22 Sno-King Watershed Council has been involved with  
23 at least five appeals of airport projects in the last four  
24 or five years. In particular, we caught the airport  
25 concealing construction of a four-acre parking lot that

1 they built without permits and without any flow control or  
2 water quality treatment. The airport director indicated  
3 that he didn't know that water quality treatment was  
4 required. So our trust of the airport is very low for what  
5 they have to say.

6 In the environmental assessment it says that there  
7 will be no new impervious surface. That is kind of a half  
8 truth. What it should say is there will be no new or  
9 replaced hard surfaces, and that's the definition in the  
10 Snohomish County Code that would trigger additional flow  
11 control or water quality treatment.

12 The environmental assessment completely overlooked  
13 the fact that there are threatened species in Big Gulch and  
14 Japanese Gulch Creeks. That's been documented by  
15 professional fisheries biologists and has been submitted to  
16 past appeals to the airport as exhibits that should have  
17 been included in there and addressed.

18 Even though this project will not -- if I read it  
19 right -- add any new or revised impervious surface, it is  
20 going to increase the pollution loading on the surfaces  
21 that are there by bringing more cars in. And the EA needs  
22 to address the threat and impact to the threatened species.  
23 And what we're talking about with the Chinook salmon are  
24 neonatal. They are like one-inch long fish. They are not  
25 the 50-pounders you might catch in Alaska. These creeks

1 provide critical habitat in their life cycle to adjust from  
2 fresh water to salt water when they're going out to sea.  
3 So it's very important that those streams be maintained.

4 The flow control durations that were listed in the  
5 2008 master plan are no longer applicable, and that 2008  
6 storm water plan cannot be used for any project. Snohomish  
7 County did that to vest under the 1992 storm water manual,  
8 which is now obsolete and discredited. And banking off  
9 site in different drainage basins will have no impact.

10 Well, how about the storm water impacts, Japanese Gulch,  
11 and the threatened species? Thank you.

12 **P261** BRAINARD LEE: Good evening. It's good to see  
13 everybody here. It's always good to get information. I've  
14 been a resident of basically Mukilteo for 25 years,  
15 although I live about three blocks into the Everett area,  
16 but I consider myself a Mukilteo resident.

17 I've been a school bus driver for Mukilteo School  
18 District for 17 years, and my route takes me around the  
19 airport all day long. I stop at all the schools at one  
20 time or another. I service Kamiak, Columbia, Endeavor,  
21 Mariner, Fairmount, and other schools. And I can  
22 equivocally say that, when you stand outside these schools,  
23 you do not hear the airplanes more than enough to know  
24 they're passing by. You do not hear any noise from any  
25 airplane if you are inside the building. So there is no

1 impact of these airplanes noise-wise to the learning  
2 ability of our students. Most of them, when they're on the  
3 playground, they look up and they enjoy seeing these  
4 airplanes.

5 I was at the meeting we had four or five years ago.  
6 Some man put up a picture of a spotted owl that was over by  
7 Green Lake, and it was his opinion that because there was a  
8 spotted owl that he took a picture of from his back door  
9 that this would stop the whole thing. That spotted owl is  
10 living happily. His grandparents lived happily. His  
11 great-great-great-great-grandparents lived happily.

12 This airport has been here since World War II. It  
13 was a fighter base, and I can assure you the airplanes that  
14 took off in those days polluted a lot more than the new  
15 jets. They made a lot more noise. After World War II,  
16 they had to have 102 Fighters, which are basically the  
17 noisiest Fighters ever designed. People I have talked to  
18 say they actually shook houses continuously as they took  
19 off. The airplanes we have now are very, very, very quiet.  
20 You'll hear a few when they actually rotate into the air.  
21 When the airplanes land, you basically can't hear them  
22 coming. So if you have got 24 flights a day, you're only  
23 going to hear the 12 or so that are actually taking off or  
24 24 taking off.

25 So I'm happy to have this airport and have

1 passenger service. I've been watching the construction. I  
2 go over to the construction site about two times a week.  
3 It's something I love to watch. I also stand out by the  
4 Museum of Flight on the berm, and I watch airplanes. And I  
5 have been disappointed. I have stood there sometimes 20  
6 minutes, and not a single airplane goes by. Not one.

7 This airport is very, very, very underutilized. I  
8 do not think it will bother you that much with these extra  
9 24 flights, and I welcome the ability of this airport to  
10 get me out of here without having to go to Sea-Tac. Thank  
11 you so much.

12 **P262** BOB BOLERJACK: Bob Bolerjack. I work for the  
13 City of Everett as the Executive Director of Governmental  
14 Affairs, and I'm here representing Mayor Cassie Franklin.  
15 I wanted to read a brief message from her: The City of  
16 Everett appreciates the very detailed analysis in the  
17 supplemental EA determining that there is no significant  
18 impact with respect to the proposed increase from 12 to 24  
19 commercial air service round trip flights per day at Paine  
20 Field. The City supports this finding.

21 We also note and agree that there will be no  
22 significant adverse impact at or in the vicinity of Paine  
23 Field when the proposed action is considered cumulatively  
24 with other past, present, or reasonably foreseeable  
25 projects. This draft supplemental EA is the latest in a

1 series of detailed studies and plans that have extensively  
2 examined significant aviation land use and environmental  
3 issues associated with Paine Field over the past 30 years.  
4 This extensive body of work supports the conclusions that  
5 the proposed action will result in no significant adverse  
6 environmental impacts.

7 Also of note is that these previous plans and  
8 studies resulted in considerable infrastructure investment  
9 using both public and private funds in the immediate  
10 vicinity of Paine Field and Southwest Everett. The  
11 resulting improvements support increased flight and  
12 business activity in the vicinity of the airport.

13 That's taken from a letter that Mayor Franklin  
14 sent, for the record. And on October 17th the Everett City  
15 Council unanimously passed a resolution supporting that  
16 position.

17 SUSAN HAYMAN: Thank you. And just a reminder  
18 again. I really appreciate that you're not clapping. It's  
19 really helpful, and I also appreciate that when you support  
20 what somebody is saying, you're raising your hands. So  
21 thank you for that. I would also appreciate it if you  
22 don't support them, if you wouldn't do that. It's a little  
23 intimidating when you're up here as a speaker. So if you  
24 could just please be respectful of their perspective,  
25 regardless of what perspective that is, that would be

1 great.

2 **P263** SAM LOW: Hi. I am Snohomish County Council  
3 member Sam Low representing and speaking on behalf of  
4 Snohomish County District 5 representing approximately  
5 160,000 people. Thank you to the FAA and the study team  
6 for your draft supplemental environmental assessment and  
7 following FAA federal guidelines.

8 I strongly support our public/private partnership  
9 with Propeller airports for commercial air service at Paine  
10 Field. I have personally hosted and spoken at many  
11 community forums in East Snohomish about the airport, and  
12 only one time did I have someone speak out against  
13 commercial air service. The strong majority of the cities  
14 and communities I represent are supportive of commercial  
15 air service at Paine Field.

16 I have with me a resolution No. 2018-31 from the  
17 City of Lake Stevens -- the largest city in my district,  
18 where I live -- in support of commercial air service past  
19 this last week, a resolution of the City of Lake Stevens,  
20 Washington supporting commercial air service at Paine  
21 Field, whereas the City of Lake Stevens is fully committed  
22 to supporting general aviation in Snohomish County and  
23 believes commercial service at Paine Field would enhance  
24 the viability of general aviation in Snohomish County,  
25 and whereas the City of Lake Stevens recognizes the

1 significance of commercial aviation to Snohomish County and  
2 the region's future transportation needs and economic  
3 competitiveness, and whereas the aerospace industry  
4 surrounding Paine Field is the largest concentration of  
5 aviation manufacturing in the world and the largest single  
6 industrial job center in Snohomish County and Washington  
7 state representing over 40,000 jobs and 2.5 billion in  
8 wages and salaries, and whereas by 2040 the region's  
9 population is projected to increase to over 1.1 million  
10 people with employment expected to swell to 426,000  
11 workers, whereas Paine Field as a secondary regional  
12 airport alternative to Seattle-Tacoma International Airport  
13 would benefit Lake Stevens residents and businesses through  
14 substantial time savings and other reduced traveler and  
15 opportunity costs, whereas Alaska, United, and Southwest  
16 Airlines are scheduled to begin offering commercial  
17 passenger flights from Paine Field to Denver, Las Vegas,  
18 Los Angeles, Oakland, California, Orange County,  
19 California, Phoenix, Portland, San Diego, San Francisco,  
20 and San Jose, California respectively, and whereas demand  
21 generated by employment, population, and income in the  
22 Paine Field market is and will continue to be more than  
23 sufficient to support commercial aviation service, and  
24 whereas it is our commitment as elected officials to  
25 advance economic development, job generation and retention

1 for the future viability of our community, and whereas  
2 commercial aviation at Paine Field will reaffirm and  
3 strengthen the region's longstanding position as the  
4 epicenter of commercial air space in the global  
5 marketplace.

6 Now, therefore, the City Council of the City of  
7 Lake Stevens, Washington does resolve as follows: The City  
8 of Lake Stevens supports the establishment of scheduled air  
9 service at Paine Field as it aligns with the community's  
10 long-term economic development goals to attract aerospace,  
11 technology, and other commercial flight industry that  
12 brings family wage jobs to our community. I'll submit the  
13 rest for comment.

14 **P264** VICTOR COUPEZ: One of my main concerns is the  
15 FAA didn't seem to even follow their own guidelines.  
16 They're supposed to, by their guidelines, study all  
17 foreseeable impacts of a project, and something as large as  
18 changing Paine Field to a commercial airfield certainly  
19 should be scoped out more than five years in advance and  
20 certainly should involve an EIS, not just an environmental  
21 assessment. And what this is going to end up doing is have  
22 the taxpayers subsidize commercial flights, not have  
23 Propeller pay for the flights, which they should. We  
24 shouldn't be paying for that.

25 Why was there no public input on the scope of this?

1 Certainly it affects enough people to where the public  
2 should have been involved in the scoping process. And this  
3 study actually was a 2009 study, and it finally resolved  
4 around 2012. And now here we are almost 2019, and yet the  
5 scope just kind of is this tiny little scope and nothing  
6 has really changed? Well, I think a lot has changed around  
7 here.

8           Just a couple other things. I haven't seen any  
9 assurances that we'll even get the pittance that was  
10 brought up in the revised supplemental assessment. And  
11 from what we heard earlier, Shoreline is experiencing that  
12 sort of thing from Sea-Tac. So how are we to be assured  
13 that we can get anything at all? So I would just like to  
14 say I want to be on record that we need an EIS, not an EA  
15 or supplemental EA. And we need everything paid for by  
16 Propeller, not by the taxpayers. Thank you.

17           **P265** ANDREW SKOTDAL: I would like to echo the  
18 comments that Jim Langus made earlier and just adopt them  
19 as my own. And rather than go through that, I will make  
20 some personal comments. I'm a 48-year resident of the  
21 area, and I have a home at the outer marker of runway 16R.  
22 When I was a child, we had to stop talking when the planes  
23 went overhead, but now it doesn't bother us at all. So I  
24 think that supports the 65 DB contour.

25           And I don't see how you can use the airport as a

1 proxy for the (inaudible) or the Dreamlifter because that  
2 has to do with Boeing. If someone were to combine the  
3 museum visits at Paine Field, the vehicle trips for the  
4 museums actually outstrips what's projected in the report.  
5 And I have not seen (inaudible) emerge to sue Boeing to go  
6 after all the vehicle trips caused by the museums. And I  
7 think the reality is that the new airport, because it's  
8 really less vehicle traffic, isn't that much of an impact.

9         There were over 700 comments submitted to Barnard  
10 Dunkelberg, and I read almost every single one of them.  
11 The comments and questions that were submitted during that  
12 part of the process are basically identical to what's being  
13 raised tonight. Those were the comments that led to the  
14 finding of no significant impact. This is a copy that I  
15 would like to submit, an opposition e-mail that went out  
16 that basically outlines the same arguments that were  
17 outlined previously.

18         And I think the EA is appropriate as to scope, and  
19 I respectfully ask that the process move forward as quickly  
20 as possible and that the airport get opened. The FAA and  
21 Propeller have followed every step they have been asked to  
22 do through the process. And if you have been out to see  
23 the terminal that's there, it's absolutely beautiful and  
24 something we will be very proud of going forward. Thank  
25 you.

1           **P266** JOHN SPITTLE: I will be brief. I have lived  
2 here for 20 years, and I have owned a house in Lynnwood for  
3 five years.

4           I heard comments tonight that our elected  
5 representatives have not heard anyone speak out about this.  
6 I don't know about you, but I have never been asked. I  
7 would like to think that my comments as a taxpayer hold  
8 value.

9           I have noticed over the past several years that  
10 existing traffic out of the airport has been getting  
11 louder. I'm echoing the same comments tonight that I have  
12 heard. I have been woken up in the middle of the night, my  
13 house shaking, airplanes flying by.

14           End of the day, Sea-Tac has a noise abatement  
15 program that they have offered to the residents in or about  
16 that area of the airport. I'm asking, regardless of what  
17 happens going forward, that if it does go forward with this  
18 plan, that at least a similar program, you know, replace  
19 our windows, quiet the noise for the houses that are  
20 nearby, I'm asking that that will continue here with this  
21 plan. That's it. Thanks.

22           **P267** ANGIE SIEVERS: First of all, thank you to the  
23 FAA and your diligence and study for this project with your  
24 analysis and the commitment to effectively mitigate the  
25 concerns raised tonight.

1           Undoubtedly we're in a time of change. 1400 people  
2 moving into our region weekly, so there is more people.  
3 Traffic, none of us love it. What are we going to do about  
4 it? We're going to have to change.

5           I've lived in Everett for 40 years. I don't  
6 remember a time like this at all. I take the bus to  
7 Sea-Tac. We travel -- my husband and I took a trip to  
8 China. We packed up our bags, we got on a bus. It took  
9 over an hour to get there. Probably better than a car in  
10 this day and age. We're a little ways away from light  
11 rail. But this is a cornerstone of bringing that to us so  
12 that we don't have to drive cars to Sea-Tac. So those  
13 trips from North King and South Snohomish County as well as  
14 north of us that are driving through this area to get to  
15 Sea-Tac will be reduced and will lessen our impact on the  
16 environment in that aspect and the time we spend on the  
17 road.

18           Last, I just want to note there's significant  
19 private investment and years of work for this asset. It  
20 comes at a time when our county and region would greatly  
21 benefit. There appears to be demand for increase of the  
22 number of flights, and we trust that the FAA's  
23 environmental assessment is valid and true based on the  
24 previous reports they have submitted. Thank you.

25           **P268**   MIKE SHEA: My name is Mike Shea, resident of

1 Mukilteo over 20 years. Just a tad about me. I'm an  
2 engineer. Also I'm a general aviation pilot and flight  
3 instructor. I have flown out of Paine Field. And a former  
4 Army helicopter pilot, by the way. Sorry about the noise  
5 for some of the folks who mentioned helicopters earlier.  
6 Just a couple questions and/or concerns that I have had  
7 after looking at this EA and some of the things that were  
8 covered. I'm going to start with a saying here some of you  
9 are familiar with: Once you let the nose of the camel out  
10 of the tent, you know what's going to follow eventually.

11 I'm going to speak a little bit from a general  
12 aviation standpoint. I notice that the terminal building  
13 is modular, as they described in the description. Right  
14 now we have got only two gates. Propeller is a business.  
15 Our airlines are a business. This is going to grow.  
16 They're not going to come here or want to come here if they  
17 can't grow.

18 My concern is, as I look at Paine Field and the  
19 existing general aviation activities that are already  
20 there, which we also can't encroach on, I want to make sure  
21 -- and I don't see where -- maybe some people would say  
22 it's out of scope, but do we at least have some kind of  
23 plan that, assuming the airlines want to grow, assuming the  
24 terminal wants to grow, how are we going to mitigate that  
25 so it does not encroach on general aviation facilities?

1           Those of you who are familiar probably know that  
2 there is a waiting list to get a hangar at Paine Field,  
3 even a tie-down. I won't quote the numbers right now. I  
4 haven't been to the website in a while, but last time I  
5 looked it was something like two to five years to get a  
6 hangar, depending on what you're looking for. So it's not  
7 like there's plenty of real estate here to develop and all  
8 that. We need our hangar space.

9           One of the two concerns immediately, how many of  
10 you are familiar with motion 18-313 that was passed by the  
11 county council in September to expand the parking lots  
12 inside the airport? From what I gathered in our  
13 preliminary discussion out here, I do not believe that was  
14 factored into this environmental assessment partly because  
15 the motion was passed by the council in September. So some  
16 of us do have concerns, particularly for what is known as  
17 lot P4 in central parking, that it may encroach on general  
18 aviation parking there. I don't know. Is anybody from  
19 WSPA or AOPA here to address that? Okay. But they know  
20 who they are. They may be sending written comments.

21           Last thing, I'm going to echo some of the comments  
22 that we hear here in closing for my last 20 seconds. We  
23 keep saying "no significant impact." Can we get some  
24 examples of what would be significant impact? What would  
25 it take? How many flights do we need before we say, oh,

1 hey, we have got to do something about this in terms of  
2 noise, environment, and road traffic would be maybe some  
3 areas you could touch on, some examples. Where is the  
4 threshold? And with that, I'm done.

5 **P269** KRISTINA MELNICHENKO: Hello. Thank you for  
6 sharing all the information. It does seem to me that the  
7 data methods are outdated and not tailored to our  
8 community. One, the coastal impacts. It says there will  
9 be none whatsoever. The first speaker mentioned  
10 international flights, and another speaker mentioned flying  
11 over Whidbey Island. I don't have a map in front of me,  
12 but I think water would be involved with both.

13 Didn't take I-5 into account. Really? That's one  
14 of the biggest, most pressing issues of our community. We  
15 literally spend like two hours to get to Seattle.

16 I understand that people drive to the airport, but  
17 we live here 24/7. People take flights a couple times a  
18 year. That's what I-5 is for. Another one, did not  
19 sufficiently address the health and safety of the  
20 maintenance workers. I'm so glad that that lady was here  
21 to speak for those people, because private profit should  
22 not override the health and safety of people who work  
23 there.

24 Speakers have mentioned that they have measured  
25 noises, the DBA being over the average that you mentioned.

1 And I couldn't agree more that an average is I'm sure very  
2 conducive to your needs but not what is going to impact our  
3 livelihoods. So when we talk about the lack of significant  
4 impacts when it comes to the environment and when it comes  
5 to the Sound and we only look at the 30 to 50 jobs that you  
6 say will be created, I want to know did you take into  
7 account the Port of Everett expansion, arctic drilling, and  
8 the increased car and ferry traffic that we're going to see  
9 anyways just from population growth? Did you look at all  
10 of those things combined and say what the impacts are going  
11 to be with all these planes flying and admitting all of  
12 those toxins into the air? So I say to you that no  
13 environmental effects and no sound effects means to me that  
14 your study is not complete.

15 I have lived here for over 20 years. I have a  
16 bachelor's degree with a minor in policy studies. I am in  
17 IT. I love allowing data to tell the story, and I do not  
18 believe there is any way that you guys allowed the data to  
19 tell you what the real impacts of this would be. I think  
20 that saying 30 to 50 jobs is worth our coastal town way of  
21 life is complete garbage. I look for jobs all over the  
22 place, and I plan out bus trips. I love the idea of being  
23 able to commute back home to Mukilteo. I don't want to  
24 live in Sea-Tac.

25 And the last thing I will say to you is that the

1 City of Mukilteo failed to stop this. Snohomish County  
2 approved this. Lake Stevens loves it, and Everett loves  
3 it. That's great. But Mukilteo failed to stop this. If  
4 you want to talk about public and private partnerships,  
5 public costs and private profits, yeah, sure. We got  
6 exactly that.

7 **P270** PATRICK PIERCE: I'm Patrick Pierce. I'm the  
8 president and CEO of the Economic Alliance Snohomish  
9 County, and our mission is to increase economic vitality in  
10 our county. In part, we do this by advocating for key  
11 economic assets in our county that will retain existing  
12 businesses and attract new ones. Paine Field and  
13 commercial air service is one of those assets.

14 Commercial air service will open up a gateway to  
15 the world into our county, and that's exciting. Airports  
16 are economic engines in communities across the globe. And  
17 Paine Field is already a tremendous asset for our aerospace  
18 industry here, and commercial air service will only further  
19 bolster our economy by generating an estimated 300 direct  
20 jobs, 20 million dollars in new payroll, and 300 million  
21 dollars in direct economic impact.

22 Our board of trustees passed a resolution in  
23 support of the draft supplemental environmental assessment  
24 findings. And speaking with existing businesses and new  
25 and potential businesses, all of them were very excited

1 about this proposal. Commercial air service as proposed  
2 will be good for our communities, growing jobs, increasing  
3 tax revenue for our local governments, schools, and  
4 generating overall economic growth by facilitating trade,  
5 tourism, and overall economic activity.

6 On a personal note, I'm a lifelong Snohomish County  
7 resident here. My wife and I are raising our two little  
8 girls, who every time an airplane, whether it's one from  
9 the museums or a commercial aircraft or a Dreamlifter, all  
10 look up and say, ooh, Daddy, look at that. That's so cool.  
11 And I think that's awesome and something I did myself here  
12 as a kid. And they're both very excited not to sit in  
13 traffic to Sea-Tac to go visit their grandma and grandpa  
14 that live out of town. Thank you very much.

15 **P271** TED HIKEL: Good evening. My name is Ted  
16 Hikel. I live at 3820 191st Place Southwest in Lynnwood.  
17 We have lived in that house for 46 years. I'm a 50-year  
18 resident of Lynnwood and I served 20 years on the Lynnwood  
19 City Council.

20 I testified at the original FAA hearing when the  
21 proposal was to allow 12 commercial flights per day at  
22 Paine Field.

23 I signed up to hopefully receive notices of any  
24 future meetings or decisions. I heard nothing. I received  
25 no notifications. For that reason, I come here tonight

1 with great skepticism for this meeting. We no longer are  
2 talking about 12 flights a day. Now the number we're told  
3 is 24. What that really means is 24 flights in and 24  
4 flights out, a total of 48 over flights each day.

5 I moved to Lynnwood 50 years ago. At that time we  
6 were given assurances that Paine Field would be a general  
7 aviation airport. Those assurances were violated by the  
8 FAA and the county council in response to business  
9 interests who would not be affected by the noise and  
10 pollution of commercialization at Paine Field. Most of  
11 them live north and east of the airport. We live directly  
12 in the path of the field. We are directly impacted by the  
13 increase of the size, noise, and pollution this will bring  
14 to our neighborhood.

15 I have no doubt that my appearance here tonight  
16 will have no, n-o, impact on your decision. It is to me  
17 obvious that this is a done deal, and this meeting tonight  
18 is only to allow you to say, quote, we reached out to the  
19 community, and we have done our due diligence.

20 You may consider me naive or stupid in light of the  
21 past promises made about Paine Field, but I want to ask  
22 you, the FAA and the county, if you're willing and able to  
23 assure us that the number of flights will be limited to 24  
24 per day for now and for all time.

25 Perhaps I'm cynical, but I fully expect Propeller

1 and the airlines to discover that, wow, that more flights  
2 will be necessary, that we have got to increase that number  
3 to 96. We need four more gates at the airport.

4 I assume the future of Paine Field will make us  
5 Sea-Tac 2.0. By that, I assume the runway limitations at  
6 Paine Field will never match Sea-Tac, but the expansion of  
7 flights will in the future lead to hundreds of flights  
8 being added to the impacts of our neighborhood that will  
9 affect our livability and the value of our homes.

10 As I testified at the original hearing, there is  
11 still no mitigation in this plan for noise impacts. There  
12 are a dozen or more schools in the flight path, and their  
13 situation should be addressed before this plan is approved.

14 Finally, give us your assurance that the number of  
15 flights will be limited for now and for all time to 24 per  
16 day. Without that assurance, it is clear you're condemning  
17 us to the same fate that residents around Sea-Tac face. It  
18 is clear that our voices carry no weight with the FAA or  
19 county, and our fate is sealed. What is your assurance?  
20 What is your promise to us tonight? Honesty counts. Thank  
21 you.

22 **P272** JERRY VERGERONT: So I'm Jerry Vergeront. I  
23 live in Everett, and I work in Mukilteo, so this is right  
24 in my backyard. First, I want to talk about the fact that  
25 rules such as 49 USC 47101(g)(1) and other rules

1 specifically state that economic impacts have to be taken  
2 into consideration when you're looking at the impact  
3 studies.

4           The study that was done here by ESA was woefully  
5 underdone. The socioeconomic impacts were not looked at  
6 very well, and the overall economic impacts were not even  
7 touched, even a little. For instance, when looking at  
8 traffic and mitigation fees that are going to be paid to  
9 allow for more traffic, they specifically stated that the  
10 mitigation fees are going to be covering lights and  
11 improvements to make traffic go faster.

12           I specifically asked this evening if ESA looked at  
13 the ongoing maintenance to the roads that are going to have  
14 to be maintained when you have 2,100 plus cars going on it.  
15 They said, no, we didn't look at that. That's a county  
16 issue. Well, guess what? This is part of the economic  
17 damage, and the taxpayers are the ones who are going to  
18 have to pay that, not anybody else.

19           For those who are welcoming this as an economic  
20 boon, you're viewing this from an elitist standpoint. The  
21 people who are receiving the money are very happy about  
22 this study. Tell me, when a company decides to build a  
23 Park and Ride, you think they're going to pave over the  
24 golf course? No. They're going to take out low cost  
25 housing or small businesses. It's not going to impact the

1 people who are going to be earning all the money and taking  
2 it outside of our county and our cities. People who think  
3 it's going to stay here are leading everybody on a foolish  
4 journey. So the economic benefit showing how the wealthy  
5 will actually benefit the most at the cost of the poor and  
6 the small businesses have not been looked at in the study  
7 and I believe should be looked at in the study. It is part  
8 of the cumulative effects as well.

9 And even when looking at the economic impacts, one  
10 of the things that ESA told me this evening is, well, that  
11 they are only looking at the smallest footprint of just the  
12 airport and nothing beyond that. So any of the overflow  
13 that the community is going to have to look at from an  
14 economic standpoint, it's not even looked at.

15 So I urge the FAA to take a look at the scope of  
16 this and realize that it's not enough to be able to have a  
17 good understanding of what the economic impact is for a  
18 community.

19 **P273** NATE RARING: Hi. My name is Nate Raring, and  
20 I don't really have anything specific prepared, but I live  
21 6.8 miles south of the runway directly in line, right on  
22 the border of Brier and Mountake Terrace. And I can tell  
23 you absolutely that the jets are loud, and it isn't just  
24 the Dreamlifter. It wakes us in the middle of the night.  
25 I have gone out and looked at them, and like a lot of

1 people described earlier, when I moved there 13 years ago  
2 and I would see the Dreamlifter go over, I went out and  
3 oohed and aahed over seeing this thing come by, but I was  
4 only seeing it maybe once a month or so. The amount of  
5 traffic has gone up, and I'm hearing a lot of people who  
6 are familiar with it saying, well, those are larger jets,  
7 and they're not the quiet ones that are going to take off  
8 and land without much noise. Well, those same people are  
9 also talking about the amount of growth that there's going  
10 to be. And I think it would be naive to believe that this  
11 is only going to be 24 planes a day and that it's only  
12 going to be these smaller aircraft. This is just the tip  
13 of the iceberg, and it's going to get worse. Thank you  
14 very much.

15 **P274** GUY FLEISCHER: My name is Guy Fleischer. I'm  
16 retired. I used to work with the National Oceanic and  
17 Atmospheric Administration. I was an acoustics specialist.  
18 I also worked on NEPA things. I read the document, and I  
19 really strongly felt and was convinced after listening  
20 today that an EIS is needed. I think it's underscoped. I  
21 really think there is a broader issue.

22 I live in Brier, way the heck south in Brier, and  
23 those planes come right over my backyard, so I will be  
24 impacted whether positive or negative. But I also have  
25 done some research of some literature of what are the

1 impacts, and there are some really nice studies out there  
2 explaining what are the depressions of property values with  
3 noise. I didn't see any of that cited in the EA. I think  
4 you need to look at that a little bit better. I would. An  
5 EA opens you up to litigation, where an EIS is a little  
6 broader. I would really strongly urge you to do an EIS. I  
7 think it would answer a lot of the questions and a lot of  
8 the concerns.

9 The one speaker earlier talked about the models  
10 behind the noise curve and things. That's right up my  
11 alley. I would strongly urge you to look at that and  
12 broaden that beyond 65 DB up to maybe a little broader,  
13 because I think there are some issues there. So I would  
14 strongly urge that FAA really look at an EIS. I know it  
15 takes longer and takes more money but think you will be a  
16 lot of safer, and I think we will all be better off for it.  
17 Thank you.

18 **P275** S. COOPER: My name is Stephanie (phonetic)  
19 Cooper. I have lived on York Road for 41 years. My  
20 husband and I are retiring soon, and so I'm making our  
21 house livable again for the next 20 years so we don't have  
22 to worry about that kind of stuff. New windows, heat pump.  
23 I've done the work myself in terms of trimming and framing  
24 the windows. I've got to put in a new floor so we can get  
25 around and we won't worry about it.

1 But what really bothers me in all of this is that  
2 this feels as if it's pushed real fast through the system  
3 so that we don't have to really look at what we have  
4 missed. And I don't mean "we," us in this room. I mean  
5 the people who have the ability to change the way this  
6 process has gone. And I think that's a shame, because  
7 if we really need this airport, it should be done right.  
8 We should have buy-in from the community. We should be  
9 talking about this not just for another four days, but we  
10 should have been talking about this. And it has been.

11 I realize this is a long process, but it looks as  
12 if there are some minds that are made up. And I'm not  
13 looking at the people who are probably the bosses. You all  
14 have bosses that are bigger than you, but we need your help  
15 in doing this right and doing it to where we all get a  
16 buy-in.

17 People use York Road as nothing. It's 25 miles an  
18 hour. People are going 50 down it, and it's a steep hill.  
19 You can't see anything. It curves a little bit. Traffic  
20 is going to find its way there in order to get to the  
21 airport, especially the people who want to get to the  
22 airport really fast that are used to taking flights. So  
23 please do it the right way. Let's get the EIS and not the  
24 short form. Thank you.

25 **P276** DANNY BRAWFORD: Good evening. Danny

1 Brawford. I have lived in Snohomish County for 79 years.  
2 I'm very much in favor of this airport, because the two  
3 cities in the world that build commercial aircraft are  
4 Toulouse, France and Everett, Washington.

5 The best airplanes in the world come from Everett,  
6 Washington. To serve this unbelievable asset, we need  
7 commercial travel for our engineers and businessmen to come  
8 into the city. Checking airplanes purchased all over the  
9 world, Boeing aircraft are now selling at about 20 percent  
10 faster than Airbus because it's a better product, and the  
11 777X is going to amaze the world in its efficiencies.

12 We used to live in a Weyerhaeuser pulp mill  
13 environment. My father was working at the Weyerhaeuser  
14 mill in North Everett. You could stand his clothes up when  
15 he came home from work. The smells and gases from those  
16 mills took all the paint off the homes on Rucker Hill.

17 Now we have a quiet pollution-free environment over  
18 the peninsula of Mukilteo where noise abatement procedures  
19 can best be flown over the water, and we're very, very  
20 fortunate. Thank you for your attention.

21 SUSAN HAYMAN: Do we have anyone else, Diana?  
22 Would anyone else who has not commented or made comment  
23 like to do so?

24 You look so much like you want to raise your hand.

25 **P277** UNKNOWN SPEAKER: I live in the Lynnwood area,

1 and I keep hearing about all these studies, and I keep  
2 hearing you haven't really completed it. So my question is  
3 what are you going to do about this input that we have been  
4 talking about here? Are you just going to ignore us? I  
5 mean, the bottom line is you guys already made a  
6 commitment, but we're up here trying to bleed our hearts  
7 out because we're living here. You guys don't live here, I  
8 bet. You probably live in a totally different area. And  
9 all we're asking is are you guys going to open the books up  
10 again and really look at everything that we have been  
11 bringing up, or are you going to whitewash and say you met  
12 the quota? We got to talk, and now we can go on and get  
13 the airport. That's my question, and I don't know who can  
14 answer that. But with all of us bleeding hearts up here,  
15 how are you going to be able to at least give us some  
16 feedback? And I think a lot of us would like to hear the  
17 feedback. So maybe one of you guys can stand up and tell  
18 us what you're going to do with this information.

19 SUSAN HAYMAN: So this is really a public  
20 comment period. So they're not going to answer tonight,  
21 but hopefully you will get your answer.

22 UNKNOWN SPEAKER: Well, I think it would be  
23 better if they did. It would probably take a lot of  
24 pressure off.

25 SUSAN HAYMAN: I understand.

1           **P278** CAROL MACMAHAN: I'm a Lynnwood resident. I  
2 have been for 20 plus years, not like Ted or others who  
3 have spoken. I felt compelled to speak tonight because I  
4 have been involved with an environmental caucus that has  
5 been considering the activities in Tacoma with their liquid  
6 natural gas. And you would say it is a false equivalency,  
7 but I see it as not. Agencies have been trying to find a  
8 shortcut to get things done faster, meet the growth that  
9 they believe is driving this activity, and they're  
10 overlooking the impacts.

11           The concern I have about the LNG in Tacoma is that  
12 they are building it now without a full EIS, as though they  
13 already have permission. They do not. I hope that you  
14 don't begin this activity with the same kind of attitude.  
15 I want to see a full comprehensive EIS done for this.

16           The Salish Sea is one of our greatest gems, and we  
17 have heard from people here who know that this is going to  
18 be dumping -- potentially dumping fuels into the heart of  
19 the Salish Sea. It will cause more increased noise. We  
20 have heard that from a number of residents that are  
21 experiencing it now. We experience it in our household,  
22 and our kids used to run out to see the big planes that  
23 would go over. What you're proposing is going to be in  
24 addition to all of that.

25           I can't believe that you have done a thorough

1 enough study under the situations that we're living in  
2 today, not ten years ago. You need to understand what the  
3 traffic impacts are. We're making assumptions. We're not  
4 dealing with facts. We're using models. We're not using  
5 actual data. So please help us. Don't go into this  
6 rashly. Thank you.

7 SUSAN HAYMAN: Thank you. And, again, just  
8 because it's probably a good reminder, we do have FAA folks  
9 that are listening here as well as folks from the study  
10 team. And then your specific comments related to this  
11 proposal are most helpful, and we have heard a lot of  
12 specificity tonight, and I do appreciate it.

13 **P279** TED P: Hi. My name is Ted. I grew up here  
14 in Washington. I'm 33 years old. My granddad worked at  
15 Boeing. He was in the Air Force until he was 55, did  
16 targeting systems for ICBMs, particularly the Minuteman.

17 And I recently moved back to Snohomish County,  
18 after going to Kamiak High School, just last year. And to  
19 be honest, had I known about the airport, I wouldn't have  
20 bought the house. But, you know, I bought it. Fortunately  
21 for me, I have a pretty decent job. I make enough money  
22 that I can eat a loss on a million dollar house and be  
23 like, well, screw it. I'm out.

24 But the majority of people here aren't in that  
25 situation, and this really sucks for them to watch their

1 property value just kind of start plummeting. And it's a  
2 year over year plummet. And the models you used in the  
3 study to kind of show the types of loss, well, it doesn't  
4 actually count property values. It wasn't really studied  
5 over areas that have the flight path. It just seems very  
6 inconsiderate to the community.

7 Now, on the very same note, you have airports like  
8 John Wayne in Southern California where the airports have  
9 actually worked with the community, and that took a class  
10 action lawsuit from the community against the airport in  
11 order to get them to engage in more extensive noise  
12 abatement policies. And maybe if you did that earlier,  
13 people would be more supportive. And if you have the  
14 support of your local community, you find that a lot of  
15 things are a lot better for customers and businesses and  
16 all the people that you're trying to quote, unquote benefit  
17 down the line. Just a thought.

18 **P280** DAN POWERS: Hi. My name is Dan Powers. I'm  
19 a 20-year plus resident of Mukilteo. I think that these  
20 meetings are kind of interesting because you see a small  
21 group of people that are mostly opposed. That's why they  
22 take the time to come to these things.

23 But I do own a business. I think there are a lot  
24 of business owners in our community that I talk to. My  
25 friends and family, they are so excited to have this

1 airport here and our ability to travel and grow our  
2 businesses and work to expand our businesses in these  
3 neighborhoods and not fight I-5.

4 I have two small children who are getting bigger  
5 now, and they love the fact that there are airplanes in  
6 this community. Their favorite thing is to see that  
7 airplane going over the Boeing freeway. They think that's  
8 the greatest thing. We knew that when we moved here 20  
9 years ago. We knew we lived by an airport. We couldn't be  
10 more excited to see this airport come in.

11 I think that the community that I work in, my  
12 friends, my family, people who are raising families, the  
13 people that I communicate with aren't here today. They're  
14 working and doing things with their family, but they're all  
15 very excited to have this airport come.

16 And I'm not sure why the opposition is so much  
17 there. The airport is a beautiful airport. It's not  
18 Sea-Tac. It's not even close to Sea-Tac. I've watched how  
19 Bellingham and the communities around Bellingham have  
20 prospered and businesses have prospered around Bellingham's  
21 airport. And it's a great airport up there. The  
22 neighborhoods are nice around it.

23 I recently remodeled my home. I'm not concerned  
24 about that, nor do I plan on leaving any time soon. In  
25 fact, I'm excited for the opportunity to be able to travel

1 more and not have to deal with the traffic.

2           And when everybody talks about the taxpayers having  
3 to pay the dollars for the communities and for the roads,  
4 well, there is a lot of business owners around here, a lot  
5 of people expanding their businesses. Are you pitching in  
6 any more for your fees and everything for the roads? No.  
7 You're paying your pro rata share, and the airport pays its  
8 pro rata share. That's how it works. And so they  
9 shouldn't have to pay to fix I-5. Boeing can fix I-5.  
10 There's a lot of those issues out there that all the  
11 business owners contribute their part, and they have when  
12 they've paid their permits and their fees.

13           When you talk about the environment, the entire  
14 Paine Field is behind in their environmental assessment,  
15 Japanese Gulch and all that. This project actually --  
16 everyone that is affected, they have actually fixed that  
17 area, enhanced the storm water treatment, and dealt with  
18 the treatment that comes into -- made it a lot of better  
19 than what it currently is today for the impact they have  
20 had. So that has all actually happened on this. So make  
21 sure that we have all done our homework and understand what  
22 we have. So thank you for your time.

23           SUSAN HAYMAN: Thank you. Do we have anyone  
24 else who would like to make a comment right now? I'm not  
25 seeing anyone. So we just have about ten minutes left in

1 what we were going to do for the sign-ins. Should we stand  
2 by and maybe check in five minutes to see if anybody would  
3 like to sign up? We're going to pause for about five  
4 minutes.

5 If you do want to make a comment, please come up.  
6 If you're heading out, please do be sure that we get a  
7 comment. Lots of way to do that. You can leave comments  
8 here tonight. If you haven't made a verbal comment, you  
9 can submit a written comment. You can e-mail comments, and  
10 you can make one with our court reporter. So we'll pause  
11 for five minutes, and then I'll come back and check in and  
12 see if anyone would like to speak. If you want to and  
13 haven't yet, please come see Diana. Thank you.

14 (Recess taken.)

15 SUSAN HAYMAN: Thank you very much for your  
16 attention this evening. Again, lots of ways to comment.  
17 We hope you will by November 2nd. Make sure it's submitted  
18 or postmarked by then. Thank you for the evening, and  
19 there are still boards out there. If you swing by, you  
20 might get a peek at them before you head out. Thanks very  
21 much, and we look forward to your comments.

22 (Public hearing comments concluded at 8:23 p.m.)  
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## Response to Comment (P217)

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Dear Sharon Swann:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### **General Responses**

- 1-6: Draft Supplemental EA Did Not Reflect the Opposition of the Community
  - 2-2: Mediated Role Determination (MRD) Document
  - 2-5: Would there be an Increase in Fuel Dump/Fuel Smell/Residue?
  - 6-1: What are the Quality of Life Impacts?
  - 6-2: What is the Impact on Property Values?
  - 6-4: What are the Health Effects Associated with the Proposed Action?
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## **Response to Comment (P218)**

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Dear Terry Wilcoxson:

Thank you for your comments regarding the Proposed Action at Paine Field.

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## Response to Comment (P219)

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Dear Valerie Krueger-Stahnke:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### **General Responses**

- 1-2: Scope of the Supplemental EA Analysis for Future Operations and Passengers
  - 1-7: Study Areas
  - 1-8: Significance of Project Impacts
  - 1-9: How is Significance Defined?
  - 2-2: Mediated Role Determination (MRD) Document
  - 2-4: Aircraft Currently Fly Low and Very Close to Houses
  - 3-1: Existing Aircraft Noise Concerns
  - 3-4: Noise Analysis Methodology
  - 6-6: What Are the Safety Impacts due to the Air Traffic Control Tower Hours?
  - 6-11: Mitigation
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## Response to Comment (P220)

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Dear Rob Stahnke:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### **General Responses**

- 1-2: Scope of the Supplemental EA Analysis for Future Operations and Passengers
  - 1-4: Adequacy of Public Involvement and Public Hearing
  - 1-7: Study Areas
  - 2-4: Aircraft Currently Fly Low and Very Close to Houses
  - 3-2: Use of the DNL Metric
  - 3-4: Noise Analysis Methodology
  - 3-6: What Are the Existing and Future Noise Impacts?
  - 6-4: What are the Health Effects Associated with the Proposed Action?
  - 6-6: What Are the Safety Impacts Due to the Air Traffic Control Tower Hours?
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## Response to Comment (P221)

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Dear Kristie Simard:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### **General Responses**

- 1-2: Scope of the Supplemental EA Analysis for Future Operations and Passengers
  - 1-8: Significance of Project Impacts
  - 1-9: How is Significance Defined?
  - 3-1: Existing Aircraft Noise Concerns
  - 3-2: Use of the DNL Metric
  - 3-4: Noise Analysis Methodology
  - 3-6: What Are the Existing and Future Noise Impacts?
  - 6-1: What are the Quality of Life Impacts?
  - 6-2: What is the Impact on Property Values?
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## **Response to Comment (P222)**

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Dear Glen Bachman:

Thank you for your comments regarding the Proposed Action at Paine Field.

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## Response to Comment (P223)

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Dear Margaret Ann Lyman:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### **General Responses**

2-5: Would there be an Increase in Fuel Dump/Fuel Smell/Residue?

6-5: What is the Impact on Wildlife?

6-9: Water Quality Impacts

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## Response to Comment (P224)

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Dear Marie Muckerman:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### **General Responses**

- 2-5: Would there be an Increase in Fuel Dump/Fuel Smell/Residue?
  - 4-1: Sources of Existing Air Pollution
  - 5-1: Existing and Future Traffic
  - 5-2: Traffic Analysis
  - 5-3: Ferry Operations
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## **Response to Comment (P225)**

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Dear Brainard Lee:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### **General Responses**

2-3: What Are the Effects of the Proposed Project on General Aviation?

Please also see the following individual response.

### **Parking and Shuttles**

Propeller contracted with Republic Parking System to provide parking, valet, and curbside services at Paine Field. Pricing is not known, and is at the discretion of Propeller.

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## Response to Comment (P226)

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Dear Kevin Stoltz:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### **General Responses**

- 2-1: Why Can't the County Limit or Restrict Operations?
  - 3-1: Existing Aircraft Noise Concerns
  - 3-6: What Are the Existing and Future Noise Impacts?
  - 3-9: Request for Noise Curfew/Activity Restrictions
  - 3-10: Boeing 747 Dreamlifter Operations
  - 6-8: Cumulative Impacts
  - 6-11: Mitigation
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## Response to Comment (P227)

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Dear Jane Chamberlain:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general response that applies to your comment.

### **General Response**

3-7: Noise Impacts on Schools

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## Response to Comment (P228)

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Dear Di Townsan:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### **General Responses**

- 1-3: Flawed/Inadequate Supplemental EA
  - 1-5: Additional Study Should Be Conducted
  - 3-1: Existing Aircraft Noise Concerns
  - 3-4: Noise Analysis Methodology
  - 3-7: Noise Impacts on Schools
  - 4-1: Sources of Existing Air Pollution
  - 5-2: Traffic Analysis
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## Response to Comment (P229)

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Dear Jerry Vergeront\*:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### **General Responses**

6-8: Cumulative Impacts

6-11: Mitigation

### **Ongoing Road Maintenance Fees**

The costs of roadway maintenance are part of Snohomish County's, City of Mukilteo's, City of Everett's and WSDOT's annual budget. The funds for these budgets are from taxes and other fees, not traffic mitigation fees. The impacts to the surrounding roadways and traffic mitigation fee calculations for the proposed action have been calculated similar to other commercial developments in Snohomish County.

\* Note - misspelled as "Bergeront" in the transcript.

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## Response to Comment (P230)

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Dear Ted Hikel:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### **General Responses**

- 1-2: Scope of the Supplemental EA Analysis for Future Operations and Passengers
  - 1-4: Adequacy of Public Involvement and Public Hearing
  - 2-1: Why Can't the County Limit or Restrict Operations?
  - 2-2: Mediated Role Determination (MRD) Document
  - 3-6: What Are the Existing and Future Noise Impacts?
  - 3-7: Noise Impacts on Schools
  - 6-11: Mitigation
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## Response to Comment (P231)

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Dear Laurice Whited:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### **General Responses**

6-1: What are the Quality of Life Impacts?

6-2: What is the Impact on Property Values?

6-3: What is the Impact of the Proposed Action On Crime?

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## Response to Comment (P232)

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Dear Kendal Harr:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### **General Responses**

1-3: Flawed/Inadequate Supplemental EA  
1-5: Additional Study Should Be Conducted  
3-4: Noise Analysis Methodology  
5-2: Traffic Analysis

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## **Response to Comment (P233)**

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Dear Shepard Cutler:

Thank you for your comments regarding the Proposed Action at Paine Field.

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## Response to Comment (P234)

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Dear Connie Chapman:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### **General Responses**

- 1-8: Significance of Project Impacts
  - 1-9: How is Significance Defined?
  - 3-6: What Are the Existing and Future Noise Impacts?
  - 5-2: Traffic Analysis
  - 6-2: What is the Impact on Property Values?
  - 6-11: Mitigation
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## Response to Comment (P235)

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Dear Guy Fleischer:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### **General Responses**

- 1-2: Scope of the Supplemental EA Analysis for Future Operations and Passengers
  - 3-3: Noise Measurements and Supplemental Metrics Requested
  - 5-1: Existing and Future Traffic
  - 5-2: Traffic Analysis
  - 6-11: Mitigation
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## Response to Comment (P236)

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Dear Di Townsan:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### General Responses

2-3: What are the Effects of the Proposed Project on General Aviation?  
3-1: Existing Aircraft Noise Concerns  
3-7: Noise Impacts on Schools  
3-10: Boeing 747 Dreamlifter Operations  
4-1: Sources of Existing Air Pollution  
4-2: Air Quality  
6-5: What is the Impact on Wildlife?  
6-10: Wetland Impacts  
6-11: Mitigation

Please also see the following individual responses.

### Cost of Airport Repairs

The FAA's Airport Improvement Program (AIP) grant program funds airport infrastructure projects such as runways, taxiways, general aviation hangars, and airport lighting/markings. The new passenger terminal and related facilities are funded by Propeller.

### Air Quality Monitoring Devices

The existing network of air quality monitoring stations has been deemed to be adequate by the US Environmental Protection Agency (EPA) and Puget Sound Clean Air Agency (PSCAA). Negligible increases in operational emissions are calculated in Section 6.2 of the Supplemental EA, which are anticipated to be largely offset by continued advances in aircraft technology. Additionally, a major factor in the area's favorable air quality is that the topography, climate, and meteorology of Paine Field allows for generally rapid dispersion and deposition of pollutants due to relatively windy conditions and among the highest frequencies of precipitation in the US. The installation of additional air quality monitoring stations would be at the discretion of the EPA and the PSCAA.

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## Response to Comment (P237)

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Dear Dale Townsan:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### **General Responses**

- 1-1: Adequacy and Use of FAA Guidance
  - 2-2: Mediated Role Determination (MRD) Document
  - 3-1: Existing Aircraft Noise Concerns
  - 3-4: Noise Analysis Methodology
  - 3-6: What Are the Existing and Future Noise Impacts?
  - 3-10: Boeing 747 Dreamlifter Operations
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## Response to Comment (P238)

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Dear Erin Corey:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### **General Responses**

- 1-2: Scope of the Supplemental EA Analysis for Future Operations and Passengers
  - 2-1: Why Can't the County Limit or Restrict Operations?
  - 2-5: Would there be an Increase in Fuel Dump/Fuel Smell/Residue?
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## Response to Comment (P239)

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Dear Kristin Kirk:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### **General Responses**

- 1-2: Scope of the Supplemental EA Analysis for Future Operations and Passengers
  - 1-3: Flawed/Inadequate Supplemental EA
  - 1-4: Adequacy of Public Involvement and Public Hearing
  - 1-5: Additional Study Should Be Conducted
  - 3-2: Use of the DNL Metric
  - 3-3: Noise Measurements and Supplemental Metrics Requested
  - 3-4: Noise Analysis Methodology
  - 3-9: Request for Noise Curfew/Activity Restrictions
  - 6-2: What is the Impact on Property Values?
  - 6-4: What are the Health Effects Associated with the Proposed Action?
  - 6-11: Mitigation
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## **Response to Comment (P240)**

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Dear Bob Mayer:

Thank you for your comments regarding the Proposed Action at Paine Field.

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## Response to Comment (P241)

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Dear Mike Murdock:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### **General Responses**

3-9: Request for Noise Curfew/Activity Restrictions

6-8: Cumulative Impacts

Please also see the following individual response.

### **Runway Usage/Wind Conditions**

It is not anticipated that there would be an increase in diversions as a result of changing winds at Sea-Tac. Aircraft typically arrive and depart into the wind and the Air Traffic Control Tower will direct the pilots to the runway they should arrive to/depart from based on wind conditions at that time.

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## **Response to Comment (P242)**

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Dear Bruce M. McGovern:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### **General Responses**

3-1: Existing Aircraft Noise Concerns

3-5: Where are Flight Tracks Shown?

3-6: What Are the Existing and Future Noise Impacts?

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## **Response to Comment (P243)**

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Dear Jim Langus:

Thank you for your comments regarding the Proposed Action at Paine Field.

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## Response to Comment (P244)

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Dear Brett Little:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### **General Responses**

3-5: Where are Flight Tracks Shown?

6-11: Mitigation

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## **Response to Comment (P245)**

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Dear Dave Fowler:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### **General Responses**

5-1: Existing and Future Traffic

5-2: Traffic Analysis

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## Response to Comment (P246)

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Dear Marilyn Brock:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### **General Responses**

- 1-2: Scope of the Supplemental EA Analysis for Future Operations and Passengers
  - 1-5: Additional Study Should Be Conducted
  - 3-6: What Are the Existing and Future Noise Impacts?
  - 6-2: What is the Impact on Property Values?
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## Response to Comment (P247)

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Dear Dan Verheul:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### **General Responses**

1-7: Study Areas

3-5: Where are Flight Tracks Shown?

3-7: Noise Impacts on Schools

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## **Response to Comment (P248)**

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Dear Dom Amor:

Thank you for your comments regarding the Proposed Action at Paine Field.

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## Response to Comment (P249)

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Dear David Fowler:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### **General Responses**

- 5-1: Existing and Future Traffic
  - 5-2: Traffic Analysis
  - 5-3: Ferry Operations
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## **Response to Comment (P250)**

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Dear Steve Tolefson:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### **General Responses**

1-2: Scope of the Supplemental EA Analysis for Future Operations and Passengers  
1-7: Study Areas

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## Response to Comment (P251)

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Dear Brian Kerk:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### **General Responses**

- 1-3: Flawed/Inadequate Supplemental EA
  - 3-2: Use of the DNL Metric
  - 3-4: Noise Analysis Methodology
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## **Response to Comment (P252)**

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Dear Jim Langus:

Thank you for your comments regarding the Proposed Action at Paine Field.

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## Response to Comment (P253)

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Dear Di Townsan:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### **General Responses**

- 1-8: Significance of Project Impacts
- 1-9: How is Significance Defined?
- 3-1: Existing Aircraft Noise Concerns
- 3-7: Noise Impacts on Schools
- 4-1: Sources of Existing Air Pollution
- 5-2: Traffic Analysis
- 6-5: What is the Impact on Wildlife?
- 6-11: Mitigation

Please also see the following individual response.

### **Air Quality Monitoring Stations**

The existing network of air quality monitoring stations has been deemed to be adequate by the US Environmental Protection Agency (EPA) and Puget Sound Clean Air Agency (PSCAA). Negligible increases in operational emissions are calculated in Section 6.2 of the Supplemental EA, which are anticipated to be largely offset by continued advances in aircraft technology. Additionally, a major factor in the area's favorable air quality is that the topography, climate, and meteorology of Paine Field allows for generally rapid dispersion and deposition of pollutants due to relatively windy conditions and among the highest frequencies of precipitation in the US. The installation of additional air quality monitoring stations would be at the discretion of the EPA and the PSCAA.

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## **Response to Comment (P254)**

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Dear Glen Bachman:

Thank you for your comments regarding the Proposed Action at Paine Field.

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## Response to Comment (P255)

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Dear Sid Horvath:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### **General Responses**

3-1: Existing Aircraft Noise Concerns

3-6: What Are the Existing and Future Noise Impacts?

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## Response to Comment (P256)

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Dear Kevin Stolz:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### **General Responses**

2-1: Why Can't the County Limit or Restrict Operations?

3-1: Existing Aircraft Noise Concerns

3-9: Request for Noise Curfew/Activity Restrictions

3-10: Boeing 747 Dreamlifter Operations

6-8: Cumulative Impacts

6-11: Mitigation

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## Response to Comment (P257)

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Dear Polagaga McLaughlin:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general response that applies to your comments.

### **General Responses**

6-6: What are the Safety Impacts Due to the Air Traffic Control Tower Hours?

Please also see the following individual response.

### **Foreign Object Debris**

Foreign Object Debris (FOD) control on the runway is expected only when the tower is occupied, which is the current protocol; if there is a necessity to remove FOD when the tower is not staffed, Common Traffic Advisory Frequency (CTAF) procedures are and would be employed (see **General Response 6-6**).

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## Response to Comment (P258)

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Dear Les Nelson:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### **General Responses**

- 1-3: Flawed/Inadequate Supplemental EA
  - 1-5: Additional Study Should Be Conducted
  - 1-7: Study Areas
  - 2-5: Would there be an Increase in Fuel Dump/Fuel Smell/Residue?
  - 3-1: Existing Aircraft Noise Concerns
  - 3-2: Use of the DNL Metric
  - 3-10: Boeing 747 Dreamlifter Operations
  - 6-8: Cumulative Impacts
  - 6-9: Water Quality Impacts
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## Response to Comment (P259)

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Dear Mike Moore:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### **General Responses**

- 1-2: Scope of the Supplemental EA Analysis for Future Operations and Passengers
  - 1-3: Flawed/Inadequate Supplemental EA
  - 1-4: Adequacy of Public Involvement and Public Hearing
  - 1-5: Additional Study Should Be Conducted
  - 1-8: Significance of Project Impacts
  - 1-9: How is Significance Defined?
  - 3-2: Use of the DNL Metric
  - 5-2: Traffic Analysis
  - 6-8: Cumulative Impacts
  - 6-11: Mitigation
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## Response to Comment (P260)

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Dear William Lider:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### **General Responses**

1-7: Study Areas

6-5: What is the Impact on Wildlife?

6-9: Water Quality Impacts

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## **Response to Comment (P261)**

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Dear Brainard Lee:

Thank you for your comments regarding the Proposed Action at Paine Field.

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## **Response to Comment (P262)**

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Dear Bob Bolerjack:

Thank you for your comments regarding the Proposed Action at Paine Field.

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## **Response to Comment (P263)**

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Dear Sam Low:

Thank you for your comments regarding the Proposed Action at Paine Field.

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## Response to Comment (P264)

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Dear Victor Coupez:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### **General Responses**

1-1: Adequacy and Use of FAA Guidance

1-2: Scope of the Supplemental EA Analysis for Future Operations and Passengers

1-4: Adequacy of Public Involvement and Public Hearing

1-5: Additional Study Should Be Conducted

6-11: Mitigation

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## **Response to Comment (P265)**

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Dear Andrew Skotdal:

Thank you for your comments regarding the Proposed Action at Paine Field.

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## **Response to Comment (P266)**

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Dear John Spittle:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### **General Responses**

1-4: Adequacy of Public Involvement and Public Hearing  
3-1: Existing Aircraft Noise Concerns  
6-11: Mitigation

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## **Response to Comment (P267)**

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Dear Angie Sievers:

Thank you for your comments regarding the Proposed Action at Paine Field.

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## **Response to Comment (P268)**

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Dear Mike Shea:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### **General Responses**

1-2: Scope of the Supplemental EA Analysis for Future Operations and Passengers  
1-8: Significance of Project Impacts  
1-9: How is Significance Defined?  
6-11: Mitigation

Please also see the following individual response.

### **Parking Areas**

As stated in Section 1.3 of the Supplemental EA, the level of service proposed by the airlines would require approximately 424 additional public parking spaces. The additional parking spaces would be provided on existing airfield pavement areas in proximity to the terminal building (parking lots P4 and P5). Although no construction activities are associated with the Proposed Action, the Detailed Study Areas include the areas of existing airfield pavement that would be converted for use as vehicle parking (see Figure 5.1-2 of the Supplemental EA).

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## Response to Comment (P269)

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Dear Kristina Melnichenko:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### **General Responses**

1-3: Flawed/Inadequate Supplemental EA

1-7: Study Areas

1-8: Significance of Project Impacts

1-9: How is Significance Defined?

3-2: Use of the DNL Metric

5-1: Existing and Future Traffic

5-2: Traffic Analysis

6-6: What are the Safety Impacts Due to the Air Traffic Control Tower Hours?

6-8: Cumulative Impacts

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## **Response to Comment (P270)**

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Dear Patrick Pierce:

Thank you for your comments regarding the Proposed Action at Paine Field.

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## Response to Comment (P271)

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Dear Ted Hikel:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### **General Responses**

- 1-2: Scope of the Supplemental EA Analysis for Future Operations and Passengers
  - 1-4: Adequacy of Public Involvement and Public Hearing
  - 2-1: Why Can't the County Limit or Restrict Operations?
  - 2-2: Mediated Role Determination (MRD) Document
  - 3-6: What Are the Existing and Future Noise Impacts?
  - 3-7: Noise Impacts on Schools
  - 6-11: Mitigation
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## Response to Comment (P272)

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Dear Jerry Vergeront:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### General Responses

1-2: Scope of the Supplemental EA Analysis for Future Operations and Passengers  
1-3: Flawed/Inadequate Supplemental EA  
1-5: Additional Study Should Be Conducted  
1-7: Study Areas  
5-2: Traffic Analysis  
6-8: Cumulative Impacts  
6-11: Mitigation

Please also see the following individual response.

### Socioeconomic Impacts

**Section 5.12** of the Supplemental EA addresses the current socioeconomic environment. **Section 6.12** addresses socioeconomic impacts and states that no residences or businesses would be relocated to accommodate the Proposed Action and no substantial impacts would occur in proximity to existing residences or businesses.

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## **Response to Comment (P273)**

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Dear Nate Raring:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### **General Responses**

- 1-2: Scope of the Supplemental EA Analysis for Future Operations and Passengers
  - 3-1: Existing Aircraft Noise Concerns
  - 3-6: What Are the Existing and Future Noise Impacts?
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## Response to Comment (P274)

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Dear Guy Fleischer:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### **General Responses**

- 1-2: Scope of the Supplemental EA Analysis for Future Operations and Passengers
  - 1-3: Flawed/Inadequate Supplemental EA
  - 1-5: Additional Study Should Be Conducted
  - 3-2: Use of the DNL Metric
  - 3-4: Noise Analysis Methodology
  - 6-2: What is the Impact on Property Values?
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## Response to Comment (P275)

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Dear S. Cooper:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### **General Responses**

- 1-2: Scope of the Supplemental EA Analysis for Future Operations and Passengers
  - 1-3: Flawed/Inadequate Supplemental EA
  - 1-4: Adequacy of Public Involvement and Public Hearing
  - 1-5: Additional Study Should Be Conducted
  - 5-1: Existing and Future Traffic
  - 5-2: Traffic Analysis
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## **Response to Comment (P276)**

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Dear Danny Brawford:

Thank you for your comments regarding the Proposed Action at Paine Field.

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## Response to Comment (P277)

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Dear Unknown Speaker:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### General Responses

1-4: Adequacy of Public Involvement and Public Hearing

1-6: Draft Supplemental EA Did Not Reflect the Opposition of the Community

Please also see the following individual response.

### Comments

All comments received during the public comment period have been responded to in **Appendix H** of the Final Supplemental EA. Additionally, after reviewing the comments, revisions to the Supplemental EA have been made where applicable.

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## Response to Comment (P278)

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Dear Carol MacMahan:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### **General Responses**

- 1-5: Additional Study Should Be Conducted
  - 2-5: Would there be an Increase in Fuel Dump/Fuel Smell/Residue?
  - 3-1: Existing Aircraft Noise Concerns
  - 3-6: What Are the Existing and Future Noise Impacts?
  - 5-1: Existing and Future Traffic
  - 5-2: Traffic Analysis
  - 6-9: Water Quality Impacts
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## Response to Comment (P279)

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Dear Ted P:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### **General Responses**

1-6: Draft Supplemental EA Did Not Reflect the Opposition of the Community

1-7: Study Areas

6-2: What is the Impact on Property Values?

6-11: Mitigation

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## **Response to Comment (P280)**

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Dear Dan Powers:

Thank you for your comments regarding the Proposed Action at Paine Field.

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PO Box 658 / Olympia, WA 98507-0658 / 1414 Cherry St. SE / Olympia, WA 98501 / 360.943.1600 / [awb.org](http://awb.org)

November 1, 2018

Environmental Science Associates  
Paine Field Supplemental EA  
5309 Shilshole Ave NW, Suite 200  
Seattle, WA 98107

**Re: Support for Commercial Air Service at Paine Field**

On behalf of the Association of Washington Business (AWB), I am writing to offer my strong support for commercial air service at Paine Field. With our region's continued growth, we need to expand and enhance our transportation infrastructure by maximizing the use of all our options and assets – as fits a growing, thriving, competitive region.

AWB is Washington's oldest and largest statewide business association, with nearly 7,000-member companies. AWB serves as both the state's chamber of commerce and the manufacturing and technology association.

For residents of Snohomish and north King County, catching a flight out of Sea-Tac can be a challenge given traffic congestion and an airport often at capacity. Commercial service at Paine Field will improve the travel experience for residents and businesses while also boosting our local economy.

When Paine Field is open, the new airport will provide travelers to/from our region with choice in how they fly commercially and will open eight West Coast destinations to new direct service.

There are currently 300 flight operations daily at Paine Field. With this existing infrastructure and new private investment, our community will be able to enjoy expanded travel options – this is a true win-win.

With the expected closure of the Viaduct and bus tunnel, and traffic diversion from tolls on the new SR 99 tunnel, fewer people traveling south through downtown Seattle is good for the region. We need to reduce our time in traffic and Paine Field will be a much-needed step forward in providing residents with better and more efficient solutions travel solutions.

New air service from Paine Field will provide our community with high quality, family-wage jobs and it will boost tourism and business travel to the region. Though our region has enjoyed a long period of prosperity and growth, there are indicators of change on the horizon: international trade disputes, tariffs, and fewer international visitors nationwide. Now is the time to bolster Washington state's trade-dependent economy.

Thank you for your commitment to a thorough and public process around this issue. AWB supports commercial air service at Paine Field.

Sincerely,

A handwritten signature in black ink, appearing to read "Gary Chandler". The signature is written in a cursive, flowing style.

Gary Chandler  
Vice President Government Affairs

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## **Response to Comment**

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Dear Gary Chandler:

Thank you for your comments regarding the Proposed Action at Paine Field.

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**From:** lone Brunt <ibrunt1@earthlink.net>  
**Sent:** Saturday, November 3, 2018 3:42 AM  
**To:** Paine Field <paine@esassoc.com>  
**Subject:** Commercial Flights at Paine Field

I regret that we were unable to attend the meeting about Paine Field last week. We were out of town.

We bought a new home in Azi Lee Estates in 2015. We moved here from California where it is required to disclose when a home is in the path of incoming or outgoing airplanes. That is not required here evidently as we were not aware that we would have planes flying quite low directly over our house.

Every time a plane goes over either coming in or going out we have several problems:

- 1) Some planes are not as loud as others, but all of them cause our cats to run and hide. They may not come out for hours. It is very traumatic for them. It is not as bad with the planes that are not as loud. We feel that planes coming into and going out of Paine Field should be the planes that are not as loud.
- 2) Whenever a plane goes over, especially a very loud one, it shakes the whole house. The shaking causes dust to be released and causes a very rapid build up of dust & dirt in the house.
- 3) Some of the planes are so loud that conversation in the house is stopped.
- 4) On occasion there is a very loud plane that flies out in the middle of the night. This plane shakes the house, scares the pets, and wakes my husband & myself up. He is able to go directly back to sleep, but I cannot and often will be awake for hours after it goes over. Very annoying.
- 5) The traffic on Beverly Way, Interstate 5 and 405 has increased significantly even over the last 2-3 years. It is hard to believe that it will not increase even more, causing significant traffic jams & delays when there are 24 more planes per day flying into and out of Paine Field.
- 6) There are reports that planes flying over homes deposit chemicals in the area that are potentially dangerous to health of inhabitants or pets.
- 7) There also is the concern for accidents occurring. Even though these are exceedingly rare, they do happen.
- 8) I do worry that having so many planes going over will drastically reduce the value of our house. This is our retirement home and we can not afford to have the value drop.
- 9) Every time a plane goes over we lose television reception. The TV goes completely blank and takes several minutes for the picture to return. This would be almost continuous if there were 24 planes a day going over our house.

John and lone Brunt  
13623 40<sup>th</sup> Ave W.  
Lynnwood, WA. 9808978  
951-235-8818

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## Response to Comment

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Dear John and Ione Brunt:

Thank you for your comments regarding the Proposed Action at Paine Field. Please see the following general responses that apply to your comments.

### **General Responses**

3-1: Existing Aircraft Noise Concerns

3-4: Noise Analysis Methodology

3-6: What are the Existing and Future Noise Impacts?

5-1: Existing and Future Traffic

5-2: Traffic Analysis

6-6: What are the Safety Impacts Due to the Air Traffic Control Tower Hours?

Please also see the following individual response.

### **Aircraft Overflights Interfering with Television Reception**

It is suggested that you contact your cable/television provider regarding the service disruptions you are experiencing.

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