

August 24, 2009

Ms. Lorena Eng, PE
WSDOT Regional Administrator – Northwest Region
15700 Dayton Avenue North
P.O. Box 330310
Seattle, WA 98133

Re: Paine Field/Snohomish County Airport Environment Assessment
Comment Resolution; GTC #05-169

Ms. Eng:

Gibson Traffic Consultants (GTC) has been requested to respond to your July 14, 2009 memo to Ryan E. Hayes at Barnard Dunkleberg & Company. Your July 14, 2009 memo was in response to a request by Mr. Hayes for scoping WSDOT analysis needs concerning the potential road traffic impacts of the proposed commercial service at Paine Field. Your memorandum identified 15 intersections that would need analysis of impacts if the proposed commercial service at Paine Field added a significant number of trips. All of the intersections included in your memo were either analyzed for future level of service conditions or have been shown not to meet the jurisdictional threshold identified under their code for analysis, based on jurisdictional responsibility and threshold of potential impacts analyzed under SEPA. Therefore the list of intersections you identified as potentially warranting level of service analysis were divided into the following categories:

Analyzed as Part of the Traffic Impact Analysis

The following intersections identified in your memo are either WSDOT intersections in unincorporated Snohomish County impacted with 10 or more peak-hour trips from the proposed commercial service at Paine Field (threshold per interlocal with Snohomish County) or are intersections under the responsibility of the City of Everett and are impacted with 50 or more peak-hour trips (the City of Everett threshold for analysis).

1. SR-526 at Airport Road – only the signalized westbound ramps intersection
2. SR-526 at Paine Field Boulevard
3. SR-99/Everegreen Way at Airport Road – City of Everett intersection impacted with more than 50 peak-hour trips.
4. Interstate-5 at 128th Street SE northbound ramps
5. Interstate-5 at 128th Street SE southbound ramps

6. SR-525 at Beverly Park Road
7. SR-525 at 84th Street SW

Existing, baseline and future level of service analysis has been performed for these intersections as part of the traffic impact analysis for the proposed commercial service at Paine Field.

WSDOT Intersections that are Not Significantly Impacted

The following intersections identified in your memo are either WSDOT intersections in unincorporated Snohomish County impacted with less than 10 peak-hour trips from the proposed commercial service at Paine Field or are intersections under the responsibility of the City of Mukilteo and are impacted with less than 10 directional peak-hour trips (the City of Mukilteo threshold for analysis).

The following intersections are either WSDOT intersections in unincorporated Snohomish County or City of Mukilteo intersections that are not impacted with 10 or more peak-hour trips from the proposed commercial service at Paine Field.

1. SR-526 at SR-99/SE Everett Mall Way/Broadway
2. SR-99/Evergreen Way at Everett Mall Way
3. SR-99/Evergreen Way at 112th Street SW
4. SR-525 at Harbour Pointe Boulevard SW
5. SR-525 at Chennault Beach Road
6. SR-525 at Harbour Pointe Boulevard
7. SR-525 at Paine Field Boulevard

City of Everett Intersection that is Not Significantly Impacted

The City of Everett has a threshold of 50 peak-hour trips that is used to determine if intersections are required to be analyzed. The ramp intersections of SR-526 at Evergreen Way are not impacted with 50 peak-hour trips. GTC has confirmed with City of Everett staff that only intersections impacted with 50 peak-hour trips from the proposed commercial service at Paine Field are required to be analyzed for the proposed commercial service at Paine Field.

Ms. Lorena Eng, PE
August 24, 2009
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GTC trusts that this response completes and clarifies the scoping of WSDOT analysis needs based on your comments to Ryan E. Hayes of Barnard Dunkelberg & Company dated July 14, 2009.

Sincerely,

GIBSON TRAFFIC CONSULTANTS, INC.

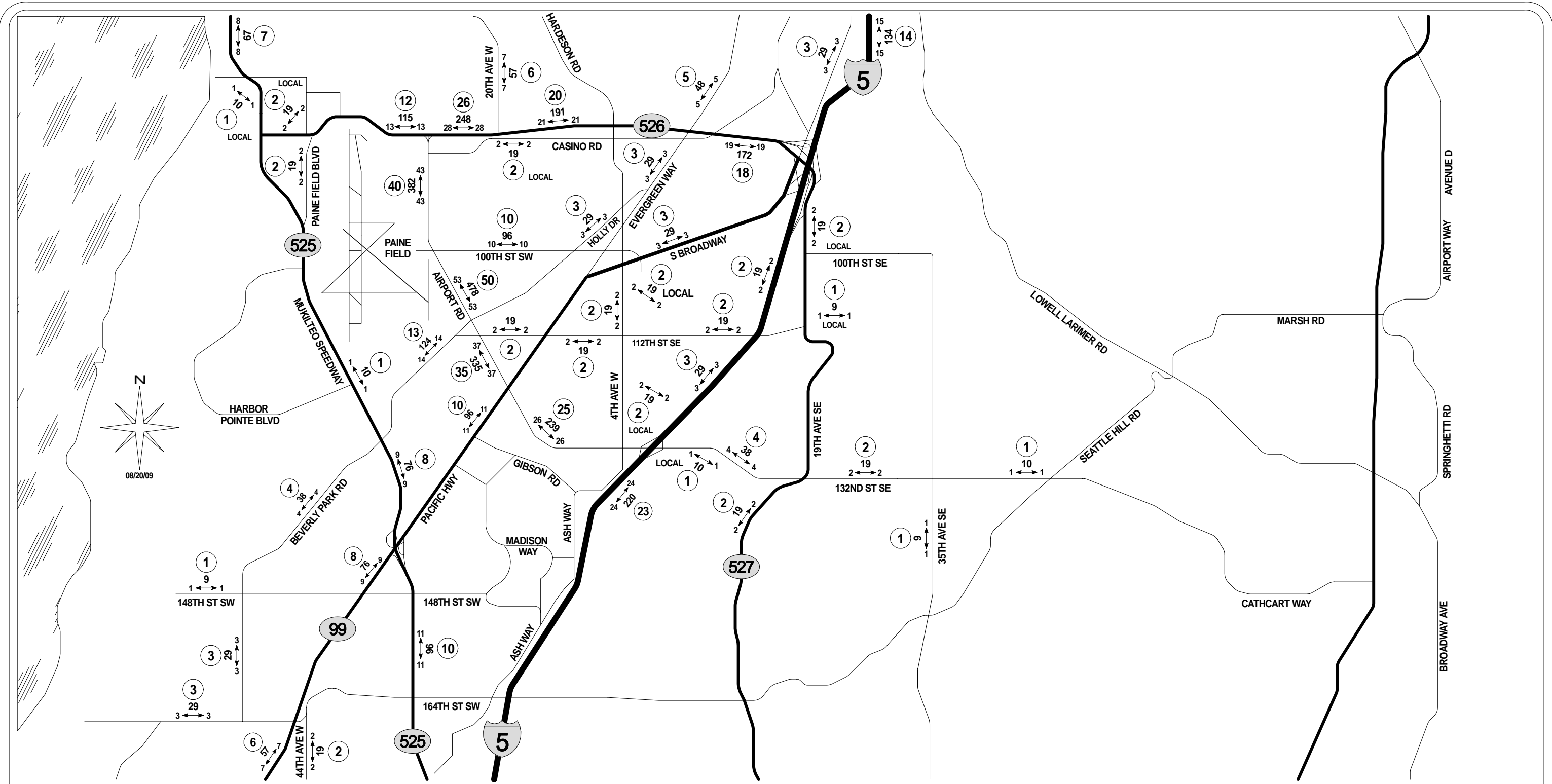
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Bradley J. Lincoln, PE
Principal

Attachments: PM peak Hour trip Distribution

CC: Bill Dolan, Snohomish County Airport - Paine Field

GIBSON
TRAFFIC
CONSULTANTS



GIBSON TRAFFIC CONSULTANTS

TRAFFIC IMPACT STUDY
GTC #09-017

PROPOSED COMMERCIAL SERVICE
AT PAINE FIELD

LEGEND
 AWDT NEW SITE TRAFFIC (DAILY/PEAK HOUR)
 PM ← → PEAK
 (25) TRIP DISTRIBUTION %

FIGURE 2
 DISTRIBUTION OF TRIPS
 GENERATED BY THE
 PROPOSED COMMERCIAL
 SERVICE AT PAINE FIELD

SNOHOMISH COUNTY



**Washington State
Department of Transportation**
Paula J. Hammond, P.E.
Secretary of Transportation

Northwest Region
15700 Dayton Avenue North
P.O. Box 330310
Seattle, WA 98133-9710

January 20, 2010

206-440-4000

TTY: 1-800-828-8368
www.wsdot.wa.gov

RECEIVED

Dave Waggoner
Director - Snohomish County Airport - Paine Field
3220 100th Street SW, Suite-A
Everett, WA 98204

JAN 22 2010

BY SNOHOMISH COUNTY AIRPORT

Subject: SR 526, MP 1.43 Vic., CS 3143
Request For Review
Paine Field Draft Environmental Assessment
December 2009

Dear Mr. Waggoner:

Thank you for the opportunity to comment on the DRAFT environmental assessment for the proposed request to begin commercial air service at the Snohomish County Airport - Paine Field. The project will add commercial airline flights to the airport, which currently serves only general aviation. A DRAFT Environmental Assessment was prepared for this proposal and submitted to WSDOT for our review and comments. We have completed our review and have the following comments:

Traffic:

1. Horizon Air proposes 20 daily arrivals/departures and Allegiant Air proposes 20 weekly arrivals/departures. Each arrival or departure is counted individually. Full operations are anticipated to begin in 2016.
2. Commercial Service will generate 966 total daily trips with 214 occurring during the peak-hour. The net trips are 956 daily trips with 212 occurring during the peak-hour due to 1% reduction alternative trips (aviation).
3. The SR 99 and Airport Road intersection currently operates at LOS F and will be impacted by 74 additional peak hour trips. The City of Everett has identified improvements to this intersection as unpractical due to lane configuration and lack of right-of-way.
4. Both (SB and NB) ramp terminals at the I-5 and 128th Street SW interchange currently operate at LOS E and will degrade to LOS F with or without this project in 2016. The SB and NB ramps terminals are impacted with 52 and 31 peak hour trips respectively.
5. We concur with the DRAFT Environmental Assessment, that there will be WSDOT mitigation of \$32,695.20 for 956 daily trips with a per trip fee of \$36 and 5% TDM reduction.

Hydraulics & Water Quality:

6. The DRAFT Environmental Assessment report indicates that the proposed alternative will only have approximately 1,000 square feet of added impervious surface and will not have any impact on stormwater facilities along SR 526 within the WSDOT right-of-way. In general, if any development at the airport adds 5,000 square feet of additional impervious surface area, and use WSDOT facilities, their mitigation should use the 2008 WSDOT Highway Run-off Manual requirements.

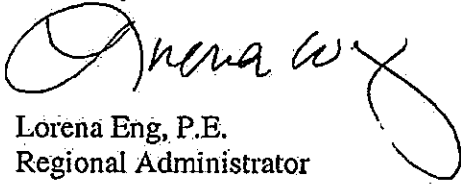
Aviation:

7. We concur with the DRAFT Environmental Assessment findings that the proposed commercial air service request would not impact the long-term viability of the Snohomish County - Paine Field airport. Additionally, the proposed request would not impact air transportation capacity within Washington state or (the Puget Sound) region.
8. Washington's aviation system must be sustained as an essential component of local, state, and national economies. Washington communities depend on aviation to move people and goods safely and efficiently throughout the state, nation, and world.
9. The Washington State Department of Transportation (WSDOT) recently completed a Long-Term Air Transportation Study (LATS) on behalf of the legislature to determine how to best meet the statewide commercial and general aviation capacity needs. The LATS Aviation Planning Council made the following conclusions:
 10. Sufficient airfield capacity exists in the state system to accommodate demand at nearby airports through 2030.
 11. In the Puget Sound region, Seattle-Tacoma International Airport has physical/geographical constraints that significantly limit opportunities for future expansion.
 12. Airports within reasonable proximity to Sea-Tac that have the potential to absorb future commercial service capacity include Snohomish County/Paine Field, Bremerton National, and Olympia Regional.
 13. The state should place a high priority on protecting and maximizing the efficiency of the airport system we already have in place before we consider the development of new airports.
 14. Free-market decisions by airlines, air passengers, and private business will play a significant role in where and how airport facilities will be utilized.

15. More information on LATS and the Aviation Planning Council recommendations, policies and findings are located on our Web site at <http://www.wsdot.wa.gov/aviation/lats/default.htm>

Thank you again for the opportunity to review and comment on this application. Should you have any questions, please feel free to contact Mr. Ramin Pazooki (206) 440-4710 my Local Agency & Development Services Manager.

Sincerely,

A handwritten signature in black ink, appearing to read "Lorena Eng". The signature is fluid and cursive, with a large loop at the end.

Lorena Eng, P.E.
Regional Administrator

LEE:rp:smb

cc: John Shambaugh, WSDOT Aviation

File SR526 MP 1.43, DRAFT EA Review.doc

Response to Comment

Dear Lorena Eng, on behalf of WSDOT:

Thank you for your comments to Paine Field Airport; they have been noted.

Please also refer to the following individual response.

Mitigation of Water Quality:

Concerns were raised over the volume of increased impervious surface area as a result of the Preferred Alternative. The Preferred Alternative would increase the impervious surface area at the Airport by approximately 1,000 square feet. As described within the Airport's Master Drainage Plan, the Alpha regional detention pond has adequate capacity to accommodate this surface runoff.
