



U.S. Department
of Transportation
**Federal Aviation
Administration**

Seattle Airports District Office
1601 Lind Avenue, S.W., Suite 250
Renton, Washington 98055-4056

September 3, 2009

Mr. Shawn Yanity
Chairperson, Stillaquamish Board of Directors
Stillaquamish Reservation
P.O. Box 277
Arlington, WA 98223

Proposed Commercial Service Operation
Snohomish County Airport/Paine Field

Dear Mr. Yanity:

The Federal Aviation Administration (FAA) would like to initiate consultation with you in accordance with Section 106 of the National Historic Preservation Act of 1966, and implementing regulations 36 CFR Part 800 for the aforementioned project. We are also initiating consultation in accordance with Executive Order 13175, Consultation and Coordination with Indian and Tribal Governments and FAA Order 1210.20, American Indian and Alaska Native Tribal Consultation Policy and Procedures.

Horizon Air and Allegiant Air have requested an operations specification to commence scheduled commercial service operations at Snohomish County Airport/Paine Field (Paine Field). The initiation of scheduled commercial service also requires a change in the airport's Federal Aviation Regulation (FAR) Part 139 Operating Certificate from a Class IV to a Class I. Paine Field staff has also requested Airport Improvement Program funding for terminal modifications to more efficiently accommodate the airline passengers. Each of these comprises the federal undertaking for this project.

The project will only involve a minimal amount of ground disturbance adjacent to the existing terminal. Since this will occur in an area that has been previously disturbed, a cultural resources inventory has not been prepared. However, a noise analysis has been prepared to determine if there will be any increase over historic properties. The Area of Potential Effect (APE) is defined by the 65 dB Day-Night Level (DNL) contours prepared for each of the forecast years. The noise analysis found that there will be a slight increase in the noise contour for each year, but not over historic properties. Accordingly, we find that no historic properties will be affected by this project and request your concurrence.

Should you have any questions or wish to discuss aspects of the project in further detail, please do not hesitate to contact me at (425) 227-2653.

Sincerely,

A handwritten signature in black ink, appearing to read "Cayla D. Morgan", is written over a horizontal line.

Cayla D. Morgan
Environmental Protection Specialist
Seattle Airports District Office

Enclosures



U.S. Department
of Transportation
**Federal Aviation
Administration**

Seattle Airports District Office
1601 Lind Avenue, S.W., Suite 250
Renton, Washington 98055-4056

September 3, 2009

Mr. J. Lawrence Joseph
Chairperson, Sauk-Suiattle Tribal Council
Sauk-Suiattle Indian Reservation
5318 Chief Brown Lane
Darrington, WA 98241

**Proposed Commercial Service Operation
Snohomish County Airport/Paine Field**

Dear Mr. Joseph:

The Federal Aviation Administration (FAA) would like to initiate consultation with you in accordance with Section 106 of the National Historic Preservation Act of 1966, and implementing regulations 36 CFR Part 800 for the aforementioned project. We are also initiating consultation in accordance with Executive Order 13175, Consultation and Coordination with Indian and Tribal Governments and FAA Order 1210.20, American Indian and Alaska Native Tribal Consultation Policy and Procedures.

Horizon Air and Allegiant Air have requested an operations specification to commence scheduled commercial service operations at Snohomish County Airport/Paine Field (Paine Field). The initiation of scheduled commercial service also requires a change in the airport's Federal Aviation Regulation (FAR) Part 139 Operating Certificate from a Class IV to a Class I. Paine Field staff has also requested Airport Improvement Program funding for terminal modifications to more efficiently accommodate the airline passengers. Each of these comprises the federal undertaking for this project.

The project will only involve a minimal amount of ground disturbance adjacent to the existing terminal. Since this will occur in an area that has been previously disturbed, a cultural resources inventory has not been prepared. However, a noise analysis has been prepared to determine if there will be any increase over historic properties. The Area of Potential Effect (APE) is defined by the 65 dB Day-Night Level (DNL) contours prepared for each of the forecast years. The noise analysis found that there will be a slight increase in the noise contour for each year, but not over historic properties. Accordingly, we find that no historic properties will be affected by this project and request your concurrence.

Should you have any questions or wish to discuss aspects of the project in further detail, please do not hesitate to contact me at (425) 227-2653.

Sincerely,

A handwritten signature in black ink, appearing to read "Cayla D. Morgan", is written over a horizontal line.

Cayla D. Morgan
Environmental Protection Specialist
Seattle Airports District Office

Enclosures



U.S. Department
of Transportation
**Federal Aviation
Administration**

Seattle Airports District Office
1601 Lind Avenue, S.W., Suite 250
Renton, Washington 98055-4056

September 3, 2009

Mr. Stanley Jones, Sr.
Chairperson, Tulalip Board of Directors
Tulalip Reservation
6700 Totem Beach Road
Marysville, WA 98270

Proposed Commercial Service Operation
Snohomish County Airport/Paine Field

Dear Mr. Jones:

The Federal Aviation Administration (FAA) would like to initiate consultation with you in accordance with Section 106 of the National Historic Preservation Act of 1966, and implementing regulations 36 CFR Part 800 for the aforementioned project. We are also initiating consultation in accordance with Executive Order 13175, Consultation and Coordination with Indian and Tribal Governments and FAA Order 1210.20, American Indian and Alaska Native Tribal Consultation Policy and Procedures.

Horizon Air and Allegiant Air have requested an operations specification to commence scheduled commercial service operations at Snohomish County Airport/Paine Field (Paine Field). The initiation of scheduled commercial service also requires a change in the airport's Federal Aviation Regulation (FAR) Part 139 Operating Certificate from a Class IV to a Class I. Paine Field staff has also requested Airport Improvement Program funding for terminal modifications to more efficiently accommodate the airline passengers. Each of these comprises the federal undertaking for this project.

The project will only involve a minimal amount of ground disturbance adjacent to the existing terminal. Since this will occur in an area that has been previously disturbed, a cultural resources inventory has not been prepared. However, a noise analysis has been prepared to determine if there will be any increase over historic properties. The Area of Potential Effect (APE) is defined by the 65 dB Day-Night Level (DNL) contours prepared for each of the forecast years. The noise analysis found that there will be a slight increase in the noise contour for each year, but not over historic properties. Accordingly, we find that no historic properties will be affected by this project and request your concurrence.

Should you have any questions or wish to discuss aspects of the project in further detail, please do not hesitate to contact me at (425) 227-2653.

Sincerely,

A handwritten signature in black ink, appearing to read "Cayla D. Morgan", written over a horizontal line.

Cayla D. Morgan
Environmental Protection Specialist
Seattle Airports District Office

Enclosures



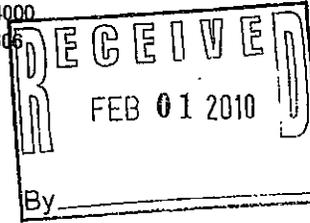
SD ✓

Board of Directors:

Mel Sheldon - Chairman
Marie Zackuse - Vice Chairman
Chuck James - Treasurer
Marlin J. Fryberg, Jr., *Sowilus* - Secretary
Stanley G. Jones Sr., *Scho Hallem* - Board Member
Glen Gobin, *ti čotč* - Board Member
Tony Hatch, *guucqtdab* - Board Member
Shelly L. Lacy, *cisanlaž* - General Manager

6406 MARINE DR. TULALIP, WA 98271
Phone (360) 716-4000
Fax (360) 716-0606

The Tulalip Tribes are the successors in interest to the Snohomish, Snoqualmie and Skykomish tribes and other tribes and band signatory to the Treaty of Point Elliot.



scope cultural surveys

Cayla Morgan
Environmental Protection Specialist,
FAA Seattle Airports District Office,
1601 Lind Ave. SW
Renton, WA 98057-3356
cayla.morgan@faa.gov

January 27, 2010

Dear Ms. Morgan,

The Tulalip Tribes thank you for the opportunity to provide comments on the proposed Commercial Service Operation at Paine Field Draft Environmental Assessment (EA). For future reference, please note that the letter you sent inviting tribal consultation was mistakenly addressed to "Tulalip Tribes Chair, Stanley Jones, Sr." and should be corrected to reflect our current Tribal Chairman, Melvin Sheldon.

Our concern with the EA as currently written is that it evaluates only the low level of flights initially suggested by the airlines or their conservative estimates of growth. We believe that the scope of this assessment, which is evaluating the impacts of new commercial airline activity at Paine Field, should evaluate this level, but also a maximum level of flights that may need to be offered to these and other potential carriers, by FAA, as they respond to the continued projected population growth and demand in Snohomish County for the next 10 -15 years. We believe this type of analysis is required by NEPA in the evaluation of cumulative impacts of past, present and reasonably foreseeable future projects and their impacts, and that the EA needs to be expanded upon in order to be a genuine and accurate attempt to determine the potential for this project proposal to "significantly" impact the environment.

We also see that no cultural surveys were conducted in the area proposed for terminal expansion. While this lies within an area that has already been partially disturbed, we are not sure as to whether cultural surveys were conducted prior to the initial disturbance of this area, and whether new excavation could lead to discovery and disturbance of cultural materials. In addition, we were unable to find information on the likely flight paths of these new commercial flights proposed, and whether they may be routed over the Tulalip Reservation. If so, this would be a concern to our tribal members, who value a quieter environment and no further degradation of our air quality.

We would appreciate it if you would take these concerns into consideration, and keep us apprised of the project EA, and any modifications, as it moves forward.

Sincerely,

Danny Simpson, Executive Director
Tulalip Tribes Natural Resources Department

Response to Comment

Dear Danny Simpson, on behalf of Tulalip Tribes:

Thank you for your comments to the FAA; they have been noted. Please refer to the following general responses (see Appendix S) that apply to your comments.

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

General Response 3-10: What is the capacity of the airport?

General Response 7-4: Flight tracks should be shown

General Response 11-8: Cumulative impacts

Please also refer to the following individual response.

Cultural Survey Not Conducted:

In response to your comments regarding the need for a cultural survey, cultural resource surveys are typically conducted when there is a reasonable expectation that the proposed action may affect cultural or historic resources or when the project area consists of previously undisturbed lands. The Area of Potential Effect (APE) for the Preferred Alternative consists entirely of pre-disturbed ground. A determination of “no effect” was made by Federal Aviation Administration (FAA) and concurred by the Washington Department of Archaeology & Historic Preservation (see Appendix J). Should cultural resources be discovered during construction, all work will be stopped and the procedures outlined in the Airport’s Inadvertent Discovery Plan (IDP) will be followed. The FAA is continuing to coordinate with the Tualip Tribe.
