

Appendix B Response to Comments

FINAL ENVIRONMENTAL ASSESSMENT – RESPONSE TO COMMENTS

Environmental Assessment for Amendment to the Operations Specifications for Air Carrier Operations, Amendment to a FAR Part 139 Certificate, and Modification of the Terminal Building at Snohomish County Airport/Paine Field.

Introduction

The Federal Aviation Administration (FAA) and the Snohomish County Airport /Paine Field (PAE) published the Final Environmental Assessment (FEA) examining the potential impacts of the proposed action on September 14, 2012 for public review and comment. The comment period was open through October 14, 2012. However, because the close of the comment period fell on a Sunday, the comment period was extended through October 15, 2012.

The Final EA was available in electronic format on the Airport's Web site at

<http://www.paineairport.com/airserviceea.html>.

Final EA copies were also available during regular business hours at the following locations: Snohomish County Planning and Development Services Customer Support Center, 3000 Rockefeller Avenue, Everett, WA 98201; Snohomish County Airport Administrative Offices 3220 100th Street S.W., Everett, WA 98204; and the following libraries: Mukilteo Public Library, 4675 Harbour Pointe Blvd., Mukilteo, WA 98275; Everett Public Library (Evergreen Branch), 9512 Evergreen Way, Everett, WA 98204; Everett Public Library (Main), 2702 Hoyt Ave., Everett, WA. 98201; Lynnwood Public Library, 19200 44th Ave. W, Lynnwood WA 98036; Edmonds Public Library, 650 Main St., Edmonds, WA 98020; and Marysville Public Library, 6120 Grove St., Marysville, WA 98270.

CDs of the Final EA were also available upon request.

The Notice of Availability was published on the Airport's Web site (cited above) and in the Everett Herald. There were display ads in the Mukilteo Beacon, the Edmonds Beacon, the Mukilteo Tribune and the Everett Tribune.

Summary of Comments Received

The Notice of Availability stated that only comments on new information presented in the FEA will be considered further by the agency. The FEA included an errata sheet prior to the table of contents that highlighted the changes to the FEA to assist reviewers.

The FEA included a detailed and comprehensive response process to the comments received on the DEA. Given the comprehensive nature of that response process, only comments and responses on new and revised information are provided herein. Comments previously addressed in the FEA are noted, but no new response has been prepared.

The following is a list of people who submitted comments to the FAA that did not relate to any of the new or revised information presented in the FEA.

Last Name	First Name	Organization	Date Received
Anderson, RN	Cynthia S.	Resident	9/24/2012
Baker	John	Resident	10/4/2012
Beyerlein	Greg	Resident	10/9/2012
Beyerlein	Netta	Resident	10/9/2012
Beyer, CPA	Jessie Dorota and	Loughrin & Company, CPA's	9/14/2012
Bochniarz	Janusz	Resident	10/14/2012
Buchanan	Jeffrey	Resident	10/3/2012
Buchanan	Patty	Resident	10/2/2012
Byers	Rickie R.	Resident	10/4/2012
Chandler	Colleen	Resident	9/25/2012
Coil	Rachel	Resident	9/14/2012
Cote	Jeff and Mary	Resident	9/14/2012
Coupez	Victor	Resident	10/15/2012
Curtis	Marcia Steve and	Resident	9/14/2012
Doten	Genella	Resident	10/13/2012
Dreier	Michael	Resident	9/14/2012
Erin	Madison	Resident	9/15/2012
Fischback	Maxwell	Resident	10/21/2012
Freeman	Samuel	Resident	9/24/2012
Griffen	Allan	City of Everett, Planning and Community Development	10/9/2012
Guzak	Karen	City of Snohomish	10/2/2012
Hart	Michael	Resident	10/15/2012
Hine	Ron	Resident	10/14/2012
Huxford	Kris	Resident	10/15/2012

Last Name	First Name	Organization	Date Received
	Shannon and		
Jay	Mike	Resident	10/13/2012
	Brian and		
Kirk	Kristin	Resident	10/11/2012
Langus	Jim	Resident	10/9/2012
Lui	Tony	Resident	9/17/2012
McDonald	Ellen	Resident	9/15/2012
McEwen	Boyd	Resident	9/13/2012
McIntyre	Charles M.	Resident	9/23/2012
Mohr	John M.	Port of Everett	10/11/2012
Ollenburg	Mary E.	Resident	10/7/2012
Ortega	Gregg	Resident	10/27/2012
Paskus	Matt	Resident	9/15/2012
Robinett	Henry M.	Resident	10/2/2012
Sawicki	Liz and Andrew	Resident	10/7/2012
		Snohomish County Committee for	
Shockley, AICP	Reid	Improved Transportation	10/11/2012
Thomas	Pam	Resident	9/24/2012
Tisdell	Greg	Resident	10/12/2012
Toorens	Hans	Resident	10/10/2012
Trapp	Jean Marie	John L. Scott	9/24/2012
Wentzel Nichols	Laurie	Resident	10/15/2012
Williams	Barbara W.	Resident	10/8/2012
Wyne	Theresa	Resident	9/14/2012

Comment Response on Final EA

Comment Response on Final EA

During the 30-day comment period on the FEA, a number of comment letters and emails were received. The letters and emails included a mix of comments on new and revised information as well as comments on information that had already received a response. The following section includes responses to comments received only on new or revised information. The comment for which a response is being provided has been restated below. Additional comments received in the same comment letter pertaining to issues previously addressed are not provided with a response or restated below but can be found in Appendix B of the FONSI/ROD.

The following comments were received on the Final EA that required a response:

Last Name	First Name	Organization	Date Received
Fahning	Janice	Resident	10/12/2012
Lichman	Barbara	City of Mukilteo, WA	9/14/2012
Moore	Julie	Save Our Communities	10/15/2012
Patchen-Short	Liza	Resident	10/14/2012

All comments are attached in alphabetical order.

Save Our Communities (October 15, 2012)

Page 2. "Why did the FAA Push to Publish a Final EA?"

"We are aware that the airlines are not knocking on the door trying to get started at Paine Field now. In fact, Horizon has indicated they are not interested at this time unless they have to engage in turf protection (discussed further herein.) Even the sponsor (Paine Field Airport) apparently indicated no urgency in pushing the EA out at this time and probably did not want to publicize the waning interest in Paine Field – that would undermine their past efforts to demonstrate some level of pent up public demand for service out of Paine Field through a flawed market study ironically done by a consultant that has now merged with the consultant chosen to do this EA. Despite waning interest of the airlines and the sponsor (the airport), and internal communications apparently calling out the poor performance of the EA consultant, FAA leadership was apparently determined to push a 'final' EA out. Why? Perhaps because the EA effort would have run on so long that it would exceed acceptable shelf life and expire. Then a new process would have to be initiated at some point in the future and would involve significant public pressure for a 'public scoping' process, something the FAA apparently does not desire."

Response: Allegiant Air and Horizon Air have not withdrawn their requests to provide commercial service at PAE. The FAA believes it is prudent to assume that either airline may initiate service within a reasonably foreseeable timeframe

Page 3. "Purpose and Need for the Proposed Action reveals FAA's Deferral to Airlines"

"The FAA cited a change under Page A.1 'Purpose and Need for the Proposed Project' stating 'The need for the proposed action is to meet demand for commercial service within the area, as identified by Horizon Air and Allegiant Air.' We take issue with both the proposed need and demand stated by the airline applicants and by the manner in which the FAA is working with the airlines' stated demand.

The FAA incentivizes airlines to forecast low activity levels when involved in starting scheduled service at an airport that does not have it. Why? Because the FAA and the airlines are well aware of the need to fully comply with the National Environmental Policy Act (NEPA) when making such changes. Both the FAA and airlines understand that greater activity levels in a NEPA assessment results in more impacts, more mitigation and more costs.

The FAA allows for lowballing 'reasonable foreseeable' activity levels by accepting applicants' proposals as the maximum level to be studied under NEPA. The fact that the FAA defers to the applicants' assessment of 'demand for commercial service within the area' for the purpose of a NEPA assessment is an abdication of responsibility. We are unconvinced that either airline has conducted a meaningful demand study under true market conditions (without subsidies). We are also equally convinced that the applicants will choose not to start flying out of Paine Field unless they receive subsidies particularly given the 'alternatives' they are already using to serve demand. On this point, the FAA improperly dismisses alternative airports as an option for the applicants even though the agency is required to consider alternatives and Horizon has indicated a preference for an alternative at this time unless they have to engage in turf protection."

Response: The FAA and the Airport Sponsor (Snohomish County) are preparing this Environmental Assessment due to the requests for the initiation of commercial service at PAE by Allegiant and Horizon Airlines. The FAA and the Airport Sponsor have provided no direction to the Airlines in relation to aircraft type, frequency of service, or pair cities presented in the airlines request. The FAA, Airport Sponsor, and the Consultant prepared aviation activity forecasts based on FAA approved methodology and incorporated the proposed service type and frequency provided by Allegiant and Horizon Airlines. Thoughtful consideration was given to what activity levels are "reasonably foreseeable".

The FAA and the Airport Sponsor are not offering any subsidies to either of the airlines requesting to initiate commercial service at PAE.

Page 4. "Inadequate and Flawed Forecasting"

"We argue that the FAA's process creates poor forecasting. The EA's Table B2 'Aviation Activity Forecast Summary' depends largely on numbers submitted by the airline applicants, Horizon & Allegiant. As stated in Appendix S, p. 18., 'The forecasts of aviation activity (Appendix G) were based on these projections supplied by the airlines.' The document includes an estimated 112,000 enplanements in 2013 growing at an annual rate of 16.3% and more than doubling to 238,200 by 2018. Yet, these numbers do not reasonably reflect the foreseeable and potential activity levels required to be assessed by NEPA."

Response: In accordance with CEQ guidance, NEPA documents are to be prepared based on reasonably foreseeable conditions.

Future operations projections are comprised of the FAA's Terminal Area Forecasts and the proposed operations by Horizon and Allegiant Air. The FAA does not believe that activity levels higher than those projected by the airlines (Appendix A) and included in the forecasts (Appendix G) are reasonably foreseeable due to coordination with the airlines and general national/local trends. Any other levels of activity would be purely speculative. Therefore, evaluation of an unconstrained commercial operation is not warranted or appropriate.

Due to the timeframe required to respond to comments on the Draft EA and changes in operational activity at the Airport during that time, the aviation activity forecasts and analysis years from the Draft EA were updated prior to the publication of the Final EA. In the Final EA, 2008 remains the base year or existing year, while 2013 was considered the initial year of commercial airline service, and 2018 was considered the future year for applicable environmental consequence analysis. No changes to the proposed number of commercial operations or enplanements by Allegiant Air or Horizon Air resulted from the modifications of forecast years.

The growth rates beyond 2018 (if any) cannot be accurately predicted at this time. It is unclear whether or not the air service would be successful, or if successful, how quickly the air service would increase beyond 2018. Such increases would be dependent on area residents choosing to fly using commercial service at Paine Field.

"We should note that 'Allegiant Air has proposed 208 operations of MD83 aircraft at Paine Field in 2010 growing to 1,040 ops in 2016.' (FEA, App. G p. 6.) While the volume is low at the outset, the annualized growth rate is actually very high, at 30.8%, consistent with Allegiant's growth at BLI. This growth rate, which represents a doubling of activity every 3 years, has been completely ignored in all of the 'modeling' done by the FAA. Indeed, the FAA's modeling actually serves mostly to dilute and obfuscate these numbers. For example, the FAA lumps the applicants' operational numbers into a category called 'AC' (Air Carrier) and then combines these with all other operational activity at the airport, including General Aviation, which has over 144,000 annual operations. (Existing versus Future Years Activity Table, App. G p. 7.) Total airport operations therefore effectively swamp the operations of the Air Carriers themselves. By doing this, the FAA's analysis improperly derives low total growth rates and effectively ignores the very issue at stake here—analysis of the impact of new Air Carriers. The FAA's analysis is therefore flawed for its failure to properly focus on the new entrants that will have the greatest impact. The analysis should focus ONLY on the impact by the Air Carriers, since this represents the Federal Actions at stake here."

Response: The FAA's noise analysis is not flawed and does focus on the new entrants and the noise impact directly attributable to the operations by Allegiant Air and Horizon Air. The noise analysis methodology is sound and based on FAA guidance for compliance with NEPA. First, a 2008 year noise contour was produced based on actual aircraft operations to represent the existing affected environment with respect to aircraft noise exposure. Then, 2013 and 2018 future year contours were produced, both with and without the project, based on the forecasts of aircraft operations for these years. The "without" project noise contours were generated using the forecast aircraft operations but without the proposed commercial service operations. The "with" project noise contours were generated using the same numbers and types of aircraft operations plus the proposed Allegiant Air and Horizon Air commercial service operations. This was done so the impact of the additional commercial service operations could be determined. The change (or delta) between the future year with and without contours is considered the noise impact attributable to the project. Because there are no non-compatible land uses within the 2013 or 2018 65 DNL contours, the 2013 and 2018 changes in noise exposure will not result in significant noise impacts.

It is also important to note that the commenter incorrectly refers to the November 2, 2009 approved forecast which was replaced by the July 24, 2012 approved forecast included in the Final EA, Appendix G, pages 1-4.

Page 13, Second Paragraph

“Despite, or perhaps because of, this clear regulatory regimen, the air quality analysis, like the analysis throughout the FEA, stopped short at a ‘maximum capacity’ of the modular terminal of two gates or 12 boarding’s per day, ignoring the manifest capabilities for modeling the capacity and emissions impacts of the full terminal depicted on the approved ALP, as well as the capacity to accommodate, and likelihood of accommodating, additional airlines in the modular terminal. That artificial limitation, however, cannot mask the air quality implications of even an attenuated Project Description. The maximum modular terminal capacity forecast set forth in FEA Appendix P. p.11, reveals, using analysis under FAA’s officially sanctioned Emissions and Dispersion Modeling System (‘EDMS’), that the project will emit 108.20 tons per year of carbon monoxide. This level is well over the 100 tons per year maintenance level applicable to CO, establishes the significance of the project’s CO impacts, and, thus, requires a full conformity analysis in the context of a full environmental impact statement.”

Response: Appendix P was prepared for the FEA as a result of commenters concerns regarding an “unlimited” number of commercial service operations. The introduction of Appendix P explains the constraints associated with the expansion of commercial service beyond that proposed by the airlines and presented in the Draft and Final EA. The FAA does not believe that activity levels higher than those projected by the airlines (Appendix A) and included in the forecasts (Appendix G) are reasonably foreseeable due to coordination with the airlines and general national / local trends. Any other levels of activity would be purely speculative.

Furthermore, Appendix P, Page 11 states the following, “As noted in Chapter D of the EA, a de minimis threshold of 100 tons of project-related CO is used to determine if a conformity determination is required for a federal action in the Puget Sound Region. However, the requirements under General Conformity only apply to direct project-related emissions and reasonably foreseeable indirect project-related emissions (40 CFR 93.152). As noted earlier in this appendix, the Terminal Capacity Scenario is not reasonably foreseeable and thus, the application of the de minimis threshold to this scenario relative to General Conformity under the Clean Air Act is not applicable.”

Page 13, VI. “The FEA’s Determination of Insignificant Noise Impacts is based on an Insupportable Noise Analysis”

“At its fundament, the FEA’s noise analysis is still based on skewed data; flawed analysis, including inconsistent baselines for the analysis; and therefore, incredible results.

First, the FEA states that the annual operations for the 2013 No Action Alternative (112,733 operations), FEA, Appendix D, 3.1.2, represent an ‘increase’ of 30,989 operations over the 2008 base case (143,722 operations), FEA, Appendix D, 3.1.1. Using simple arithmetic, without complex models or computers, reveals that the 2013 No Action Alternative actually represents a decrease of 30,989 operations when compared with the 2008 base case. This elementary mistake might be chalked up to typographical error if it were not repeated in the comparisons between the 2018 No action Alternative (113,787 operations) and the 2008 base case; and again, between the 2018 Preferred Alternative (122,127 operations) and the 2008 base case. Moreover, apparently because of the erroneous arithmetic conclusions, the FEA contains no explanation of the cause of these decreases in the later years, or, more comprehensively the assumptions that guided the noise analysis in general. Without belaboring the obvious, these unexplained counter-arithmetic results are absence of any delineation of the noise analysis’ operant assumptions, casts further doubt on the integrity of the analysis in its entirety.

Second, the noise analysis is inconsistent with respect to the operant baselines for analysis. On the one hand, the FEA goes to great pains to analyze future year operations, both No Action and Preferred Alternatives, upon which the noise analysis is apparently (although not explicitly) based, against the ‘2008 base case.’ This comparison is borne out by FEA, Figure C6, Existing Noise Contours (2008), p. C.18, and the FEA, Appendix D, p.1, which refers to the ‘2008 base case.’

Nevertheless, FEA, Appendix D, 3.1.2, p.3, states, without explanation: ‘This [Future Year 2013 No Action Alternative] will be used as a baseline to compare Future Year 2018 Preferred Alternative noise contours.’ This unexplained disparity between the use of the 2008 and 2013 base cases represents another methodological nail in the coffin of the FEA’s determination of the insignificance of the “project’s” noise impacts.

In short, given the noise analyses’ methodological inconsistencies, particularly the apparent use of inconsistent baselines for analysis throughout, the critical determination of the project’s noise impacts cannot be adequately evaluated by the public, and certainly cannot be definitively determined to be insignificant. The project’s noise impacts must, therefore, be fully analyzed, including all derivative noise contours, in the context of a full EIS.”

Response: As you noted in the above comments on the FEA noise analysis, the use of the term “increase” in the noise analysis appendix (Appendix D) is a typographical error and should have been changed to “decrease” in the locations referenced. Please accept our apology for the oversight of this typographical error. As explained in the Errata Sheet at the beginning of the FEA under the heading Summary of Changes, the initial noise analysis in the DEA represented an increase in aircraft operations in the future years over the 2008 actual level of operations. However, due to significant decreases in general aviation activity at the Airport in recent years, the future years of 2013 and 2018 in the FEA represent decreases in total aircraft operations over the actual 2008 levels.

Also, we appreciate the concern about the inconsistent use of the terms “baseline” and “base case” in the main body of the FEA and in Appendix D. However, the noise analysis methodology is sound and based on FAA guidance for compliance with NEPA. The 2013 and 2018 noise contours are not compared to the 2008 year noise contours. Rather, the 2013 and 2018 contours both with the project and without the project are compared to determine the noise impact attributable to the project.

The noise analysis in the FEA first developed a 2008 year noise contour was produced based on actual aircraft operations to represent the existing affected environment with respect to aircraft noise exposure. Then, 2013 and 2018 future year contours were produced, both with and without the project, based on the forecasts of aircraft operations for these years. The change (or delta) between the future year with and without contours is considered the noise impact attributable to the project. Because there are no non-compatible land uses within the 2013 or 2018 65 DNL contours, the 2013 and 2018 changes in noise exposure will not result in significant noise impacts.

Page 13, VII. “The FEA Fails to Adequately Analyze the Project’s Potential Surface Traffic Impacts”

“The traffic analysis in the FEA presupposes that the maximum impact of allowing what may potentially be unlimited commercial air service will only be 956 daily vehicle trips, assuming 1/5 to 2/4 persons per vehicle, all based on limited number of flights by Horizon and Allegiant (which can’t, as set forth above, be limited). Using these minimal volumes, the EA analyzes 15 intersections, only seven of which purportedly realized 10 or more daily peak hour trips. In addition, several critical intersections and interchanges that lead from Route I-5 to Paine Field, such as I-5/I-405/SR525 Swamp Creek interchange, SR 525 and Lincoln Way, SR525 arterial, were not studied because the analysis purports to show that they would not receive more than 10 peak hour daily trips. The severity of impacts to, among others, I-5, SR525, the I-5/128 Street interchange and 128th Street (SR96) from I-5 to Paine Field, as well as the

SR99/128th Street Signal which already operates at Level of Service F, the worst possible level of service patently requires further evaluation.”

Response: The traffic analysis performed for the FEA is based on the AM and PM peak-hours and assumes that there is one arrival and one departure for Horizon Air and Allegiant Air, known as a “full turn.” This assumption resulted in a trip generation of 212 off-site AM and PM peak-hour trips, which were used for the analysis in the FEA.

These trip generation assumptions were compared to the operations at Bellingham International Airport, which serves Horizon Air and Allegiant Air. It was found that the time between a full turn for Horizon Air and Allegiant Air is closer to two hours. Therefore, the assumption that all of these trips will occur during one hour at Paine Field is conservatively high. The trip generation calculations were also compared to the analysis performed by The Transpo Group for the Bellingham International Airport expansion, dated November 2009. The analysis shows that the existing 1,100 daily enplanements, which equates to approximately 385,000 annual enplanements, generates 131 PM peak-hour trips. In comparison, the project is anticipated to generate 238,200 annual enplanements by 2018, approximately 38 percent less than the existing annual enplanements as Bellingham International Airport. However, the anticipated trip generation for the project is 212 PM peak-hour trips, which is 60% more trips than Bellingham International Airport currently generates with more than double the annual enplanements. The trip generation calculations performed for the project are also similar to the maximum peak-hour trip generation calculations that were calculated by Hirsh Associates in their analysis. The three comparisons of the peak-hour trip generation of the project show that the trip generation is conservative.

The analysis performed in the FEA is based on the criteria that the jurisdictions use when evaluating impacts. Snohomish County utilized impacts to arterials, such as 128th Street SW/Airport Road from I-5 to Paine Field, while WSDOT, the City of Mukilteo and the City of Everett utilize impacts to intersections. The FEA analyzed arterials and intersections that were identified during the scoping process with these jurisdictions and according to their thresholds for requiring analysis. It is important to note that WSDOT does require the analysis of freeway interchanges, such as the I-5/I-405/SR-525 interchange, since this is done as part of the WSDOT regional freeway analysis and planning. The FEA did include the analysis of the I-5 ramps at 128th Street SW/SR-96, in accordance with WSDOT’s analysis criteria and scoping. The project will be paying traffic mitigation fees to WSDOT to mitigate the impacts to this interchange.

Janice L. Fahning (October 12, 2012)

Liza Patchen-Short (October 14, 2012)

Note: The two commenters listed above included the same comments and thus, the responses below are intended to address both letters.

Page 1. "I am requesting that before a determination is made to amend Pat 139, a study is completed that looks at the actual in the moment noise decibel levels local residents will be impacted too. It is not acceptable to use the FAA's method that only looks at average noise levels over a 24-hour period. If a plane flies over my house resulting in a decibel reading of 140 once every hour averaging this with the other minutes my house and ears are not shaking is not a defensible analysis of impact to the community."

Response: The analysis of aircraft noise exposure used in the Draft and Final Environmental Assessment (EA) was prepared in compliance with Federal Aviation Administration (FAA) Orders 1050.1E, Change 1 and 5050.4B. Those orders require the use of noise exposure contours using the FAA's Integrated Noise Model (INM) showing the area affected by 65 Day-Night Noise Level (DNL) and greater noise levels. DNL is the standard required metric for quantifying aircraft noise exposure. As a result of the 1979 Aviation Safety and Noise Abatement Act (ASNA), Congress required the FAA to select a single metric to standardize the evaluation of aircraft noise. In response to ASNA, through Federal Aviation Regulations (FAR) Part 150 Noise Compatibility Planning, FAA formally adopted DNL as its primary metric for evaluating aircraft noise to ensure consistency across the country. FAA Order 1050.1E, Change 1, Paragraph A14.1, states "For aviation noise analysis, the FAA has determined that the cumulative noise energy exposure of individuals to noise resulting from aviation activities must be established in terms of yearly day/night average sound level (DNL) as FAA's primary metric."

DNL is the 24-hour average sound level in A-weighted decibels (dBA). This average is derived from all aircraft operations during a 24-hour period that represents an airport's average annual operational day. DNL reflects the inclusion of a penalty to each aircraft operation occurring during nighttime hours (10 p.m. to 7 a.m.). This penalty attempts to compensate for people's heightened sensitivity to noise during this period. Significant project-related effects are defined as impacts to noise sensitive land uses at or above the 65 DNL that experience a project-related increase of at least 1.5 DNL.

DNL contours were prepared with the FAA's Integrated Noise Model (INM), version 7.0a. The INM is a state-of-the-art, FAA approved software program used to model the noise exposure

levels from aircraft operations and engine testing and produce contours of equal noise energy. These contours are presented using the 65 DNL noise contour metric where 65 DNL represents significant aircraft noise levels, and project-related significant impacts are identified based on a project-caused increase of 1.5 DNL within the 65 DNL contour for noise sensitive land uses.

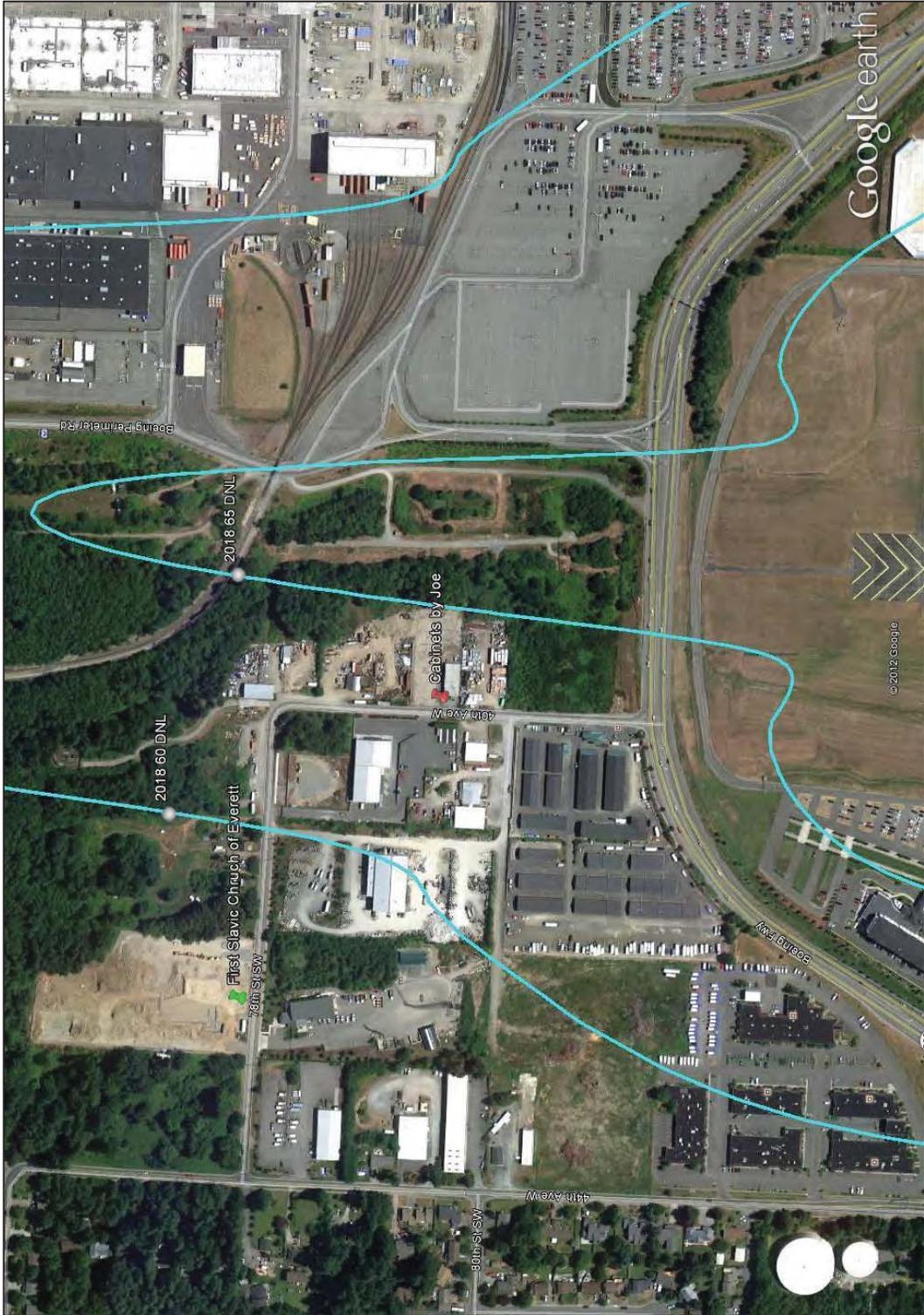
Although the FAA recognizes that noise occurs outside of these contours, the 65 DNL contour has been federally accepted as the level at which residential and other noise sensitive land uses are non-compatible with aircraft noise. Because the existing 65 DNL noise contour shown on Figure C6, page C.18 of the FEA, does not encompass noise sensitive land uses (homes, schools, churches, etc.), the existing land use in the vicinity of the Airport is considered compatible with aircraft operations and aircraft generated noise under the federal guidelines.

Page 2. "By 2018, the change in the 65 DNL noise contour compared to the No Action Alternative would be an increase of approximately 17.6 acres. The additional area impacted by this action includes residential dwellings within the cabinet shop on 40th Ave West, residences on 44th Avenue West and a church on 78th Street SW. The 65 NDL contour is not compatible with this existing land use."

Response: The analysis of aircraft noise exposure used in the Draft and Final EA was prepared in compliance with FAA Orders 1050.1E, Change 1 and 5050.4B. Those orders require the use of noise exposure contours using the FAA's Integrated Noise Model (INM) showing the area affected by 65 Day-Night Noise Level (DNL) and greater noise levels.

The residential dwellings and church identified in the comment are not located within the 65 DNL noise contour. The land area within the 17.6 acre increase in the 65 DNL noise contour do not include any noise sensitive land uses. Because the existing 65 DNL noise contour shown on Figure C6, page C.18 of the FEA, does not encompass noise sensitive land uses (homes, schools, churches, etc.), the existing land use in the vicinity of the Airport is considered compatible with aircraft operations and aircraft generated noise under the federal guidelines. Therefore, the existing land use in the vicinity of the Airport is considered compatible with aircraft operations and aircraft generated noise under the federal guidelines.

The following exhibit illustrates the locations of residential dwellings and church identified in the comment in relation to the 65 DNL noise contour.



Page 2. "Traffic Analysis: The fundamental flaw in this process is that the Environmental Assessment is looking at the impacts of only a few flights while getting it through opens the door for unlimited flights of the airplane models and carriers applying, without further assessment or mitigation. The traffic analysis study needs to be redone to evaluate to study the full capacity of the door that will be opened for flights with this ruling. Appendix P raises this discussion but did not evaluate it as related to environmental consequences."

Response: The commenter stated that the fundamental flaw of the traffic analysis was that it should have been based on longer term forecasts of operations or the maximum capacity of the Airport. In response to similar comments on the Draft EA, Appendix P was created and included in the FEA. Appendix P presents the effects to noise, air quality and surface transportation if the maximum capacity of the proposed modular terminal is reached. Although not considered reasonably foreseeable, this information was presented for informational purposes only. Any expansion to the proposed terminal would require additional environmental documentation.