



**Snohomish County**  
**Planning and Development Services**

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3000 Rockefeller Avenue, M/S 604  
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**REVIEW LETTER**

**DATE OF LETTER:** January 24, 2017  
**PROJECT FILE NUMBER:** 16-109244 LDA  
**PROJECT NAME:** Paine Field Passenger Terminal

**APPLICANT and CONTACT:**

Mark Reichin  
Propeller Airports Paine Field  
9724 – 32<sup>nd</sup> Drive W  
Everett, Washington 98204

**PROJECT DESCRIPTION:**

Earthwork in preparation for the construction of a 29,300 square foot commercial airline passenger terminal.

**REQUIRED INFORMATION:**

The following information is required to further evaluate your proposal.

**SEPA Review Comments:**

Project Manager: Tom Barnett 425-388-3311 extension 2997 [tom.barnett@snoco.org](mailto:tom.barnett@snoco.org)

After reviewing the SEPA checklist and related information identified in section A(8) of the checklist, PDS is concerned that reliance upon the Final NEPA Environmental Assessment prepared by the FAA relating to that Finding of No Significant Impact (FONSI) and Record of Decision (ROD) as issued by the FAA dated December 2012, may not provide reasonably sufficient information to evaluate the environmental impacts of the proposal (new terminal facility), upon the elements of noise (Section B(7)(b)), and transportation (Section B(14)).

Specifically, appendices K and P to the Final NEPA Environmental Assessment appear to recognize that the proposed terminal facility has the capacity to serve additional flight operations and related passenger enplanements beyond those evaluated under the specific proposals submitted by Horizon Air and Allegiant Air as reviewed by the FAA for purposes of the Final NEPA Environmental Assessment. While we recognize that such limited scope of review was deemed adequate by the court for purposes of the FAA's scope of review associated with its permitting

action, that decision was based in part upon the fact that the FAA will essentially have a right of phased environmental review to evaluate any incremental increase in commercial flight operations at the Airport based upon the FAA's jurisdiction over an air carrier's Part 119 Operations Specifications for Air Carrier Operations.

However, the County will have no such independent basis for further evaluation of the environmental impacts created by incremental increases in commercial flight operations unless there is some additional expansion of the terminal facility required triggering some permitting authority by the County. For this reason, PDS believes that the scope of environmental review associated with the proposal at the County level under SEPA necessarily requires that we consider the cumulative impacts of future utilization of the new terminal facility based upon the reasonably foreseeable full utilization of that terminal facility.

Accordingly, pursuant to WAC 197-11-355, PDS is requesting that you provide additional research or study evaluating the environmental impacts of the proposed terminal facility upon the elements of Noise (SEPA Checklist, Section B(7)(b)); and Transportation/Traffic (SEPA Checklist, Section B(14)), with regard to the cumulative impacts associated with the reasonably foreseeable "full" utilization of the terminal facility.

In stating the above, we recognize that the previous court in addressing the adequacy of the Final NEPA Environmental Assessment stated that deference is to be given to the FAA's expertise in the context of aviation forecasting and that it was reasonable for the FAA to utilize a "demand-based" projection as oppose to speculating upon the number of flight operations that could someday be carried out at Paine Field.

To clarify what PDS is requesting, we are not requesting that you provide further environmental evaluation based on some speculative analysis of future commercial flight operations at the Airport as a whole. Rather, we are asking that you provide a limited expansion on the evaluation of the potential environmental impacts to the elements of noise and traffic as they relate to the reasonably foreseeable "full" utilization of the capacity of the proposed terminal facility to serve commercial flight operations. If in your opinion such information (i.e. forecast of full utilization of terminal capacity) is not reasonably available or speculative, we would request that you provide supporting analysis consistent with WAC 197-11-080 explaining why the means to obtain it are speculative or not known.

### **FURTHER PROJECT REVIEW**

Review of your proposal will continue upon the receipt of the above listed information.

Please do not hesitate to contact me at 425-388-3311, extension 2997, or via e-mail at [Tom.Barnett@snoco.org](mailto:Tom.Barnett@snoco.org), if you have any questions about this letter.

Sincerely,

A handwritten signature in black ink, appearing to read 'T. Barnett', with a horizontal line extending to the right.

Tom Barnett  
Project Manager