



Endeavour Elementary PTA  
Unit #7.5.8 Mukilteo, Washington

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

Mr. Dave Waggoner, Director  
Snohomish County Airport  
3220 100th Street S.W., Suite A  
Everett, WA 98204

Re: Draft Environmental Assessment

Dear Ms. Morgan and Mr. Waggoner:

The Endeavour Elementary School Parent Teacher Association (PTA) members have followed the Paine Field issue both as citizens and as parents concerned with providing our children a safe, healthy and productive learning environment. We feel compelled to comment on the Draft Environment Assessment (EA) related to federal actions being considered at Paine Field.

The EA fails on several levels including a failure to comply with Executive Order 13045-- *Protection of Children from Environmental Health and Safety Risks* (E.O.) as it does not fully assess all impacts to children as required. The EA's finding that schools are not impacted because they are not in the "project area" is far from the rigorous analysis required and expected by the public in matters related to the health and safety of our children. It is well known that there are no schools actually "in the project area" where the proposed terminal would be constructed. The impacts to children we are most concerned with are not those associated with project construction but with the start up and growth of scheduled commercial air service resulting from terminal construction and a change in Paine Field's Airport Operating Certificate from a general aviation airport to a commercial airport.

Outside the terminal area and under the Paine Field flight paths are schools located with the cities of Everett, Mukilteo, Lynnwood, Edmonds, Woodway, Brier and Mountake Terrace. If only public schools are accounted for that is well over 53,000<sup>1</sup> schoolchildren who would be affected by

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1 Source: Schoolmatters.com; Everett School District; Mukilteo.wednet.edu

proposed scheduled passenger flights at Paine Field. This number grows significantly if all schools including preschools, private and parochial schools are included as well as daycare facilities, tutoring centers and recreational facilities like Boys and Girls Clubs and YMCA's.

We understand that FAA rules do not allow restrictions on scheduled commercial service once it starts up. We therefore do not understand how the FAA could possibly accept an EA that does not fully account for all the impacts that unconstrained commercial air service will have on children both in and out of school. Further, we do not understand why the public including the schools were not included in the preparation and project scope of the EA which would have provided a more proactive way to ensure all impact concerns were fully considered.

The proposed Federal Action resulting in a change to the Operating Certificate for Snohomish County Airport/Paine Field from a Class IV to a Class 1 airport would open the door to unconstrained commercial air service subjecting these schools and learning sites to an increase in noise, pollution, health and other environmental impacts that must be identified and assessed with the EA.

We therefore request you respond to the following recommendations:

- Reject the Draft EA and instead conduct a more thorough Environmental Impact statement (EIS) based on the foreseeable significant impacts associated with changing the airport's Operating Certificate.
- Ensure potential impacts of unconstrained commercial air service growth are fully considered in full compliance with NEPA and E.O. 13045.
- Maximize involvement of the public including PTA's and other non-governmental organizations during scoping and preparation of the EIS to best ensure that all concerns are included.
- Ensure the latest learning environment and children's health studies are incorporated in the EIS effort.
- Include a complete listing of all schools, both public and private, that may be impacted by unconstrained scheduled commercial air service.
- Include all potential mitigation costs to school districts both short and long term.

We look forward to your response and appreciate the opportunity to participate.

Endeavour Elementary PTA Board of Directors