

## Talking Points to Oppose Scheduled Air Service At Paine Field

**We support the General Aviation role of Paine Field.**

**We support the industrial role of Paine Field (for Boeing and its suppliers.)**

**We support our Quality of Life by opposing the use of Paine Field for commercial (scheduled) airline service.**

For 28 years, the MRD has successfully balanced the needs of

- Government
- Business
- Citizens (home-owners)
- Promotes “Quality of Life”
- Promotes economic development

If you remember nothing else...Remember this:

Quality of Life = A great community + economic development

- It's impossible to support air service expansion AND claim to support quality of life.

In 1978/79, Paine Field Mediation Panel Recommendation that Paine Field remain light aircraft oriented with the role defined as “General Aviation” and that scheduled air service would be strongly discouraged. (Mediated Role Determination, or MRD, of 1978/79). **The County cannot repudiate a 30 year old promise. A deal's a deal!**

On April 11, 1978, the Snohomish County Commissioners adopted by resolution the “Role for Development of Paine Field,” and in 1979, further adopted by resolution the recommendation of the Paine Field Mediation Panel in accordance with the “General Aviation” role for that public facility, a role which was subsequently reaffirmed by Snohomish County in 1989, 1992, and again in 2001. **The County has reaffirmed its promise to the people. County Executive Aaron Reardon has continued to reaffirm his support of the MRD.**

Snohomish County allowed and has continued to allow single and multiple family zoning, with the result that a substantial residential community has developed in the area based on the County's promise to protect the community from adverse airport impacts, specifically the use of Paine Field as a major commercial airport. **Don't let the County do a “bait and switch” on the community. 30 years of development based on a promise cannot be undone now!**

Since 1979, families, business owners, and public schools have relied on the MRD in good faith, and invested billions of dollars into their homes, businesses, and schools in the vicinity of Paine Field.

The integrity of a democratically-elected government's commitment to the constituency it serves is the absolute foundation for a free and just society, and that any abridgment of the promises made by government to citizens threatens the very substance of a civilized society.

The cities of Edmonds, Mukilteo, Lynnwood, Mountlake Terrace and Woodway, (representing over 77,000) have expressed their opposition to commercial air service at Paine Field. **The majority of South Snohomish County opposes the use of Paine Field for scheduled flights!**

### **About the Regulatory environment**

**If Allegiant or Horizon try to operate here, we can make it prohibitively expensive. We have legal tools to not just discourage, but PROHIBIT air service, if the County has the will to do this. See below.** Snohomish County Council can enact any or all of these in its capacity as operator of Paine Field.

- Assess airport user fees to discourage (without discriminating) scheduled air passenger service to operate and maintain the airfield and airport. Fee structures can discourage air passenger service while not being “discriminatory.”
- **Assess Mitigation Fees**
  - Environmental Impact Review should include mitigation fees for impacts for:
    - § **Water pollution** (water run-off to Big Gulch and other watersheds); Carcinogens in our water supply from de-icing slurries, oil and fuel run-off.
    - § **Air pollution (higher carbon footprint)**
    - § **Noise mitigation** for surrounding homes, schools and businesses. Require Allegiant, Horizon and any other carrier to pay full costs—estimated at over \$200 Million for schools alone. Lost value to real estate estimated at 10-25% of property values. (Mitigation costs based on similar mitigation costs for Sea-Tac communities.)
    - § **Health effects (hypertension, high blood pressure, higher pregnancy complication rates, asthma and other respiratory problems)**
  - No capital improvement expenditures:

§ Snohomish County should refuse to pay for terminal facilities, parking, security or any other enhancements—these must all be paid by the carrier.

- **No change in Paine Field’s Airport Operating Certificate**

- Paine Field is currently a Class IV airport, which cannot serve scheduled large or small air carrier aircraft. The County should ensure no change to the Class IV certificate is made without full public disclosure, public hearings, and environmental impact review. **The Parties should incorporate higher standards of disclosure about the Airport Operating Certificate in an ILA with the County.**

- Compliance with Airport Noise Capacity Act (ANCA). Snohomish County, as the proprietor of Paine Field, could impose a **legal prohibition** on passenger service if it first followed an exhaustive study and procedures under FAA regulations, Title 49 USC, 14 CFR Part 161, (“Part 161) to obtain a “Proprietor Exception.” **The Parties should begin a Part 161 application under ANCA to obtain a Proprietor Exception. This would not jeopardize any federal funding the airport currently receives.**

- We have two regional planning documents from the Puget Sound Regional Council (PSRC): *Destination 2030* and *Vision 2030*. Both incorporate the PSRC’s Resolution A-93-03. That resolution conditionally authorized construction of the third runway at Sea-Tac. That resolution also indicated that a "major supplemental airport should be located in the four-county area within a reasonable travel time from significant markets in the region." The resolution also stated: "**Eliminate small supplemental airports, including Paine Field, as a preferred alternative.**" Therefore, based on Resolution A-93-03 alone, the Parties can argue that Snohomish County cannot now amend its Comprehensive Plan to authorize scheduled commercial service at Paine Field because to do so would be inconsistent with that PSRC resolution.

The MRD and the GMA

- The Growth Management Act (“GMA”) is a “cascading hierarchy” of substantive and procedural planning requirements

Binding language--Puget Sound Regional Council

- PSRC adopted Resolution A-93-03 in their Comprehensive Plan.
- That resolution also indicated that a "major supplemental airport should be located in the four-county area within a reasonable travel time from significant markets in the region."
- The resolution also stated: "**Eliminate small supplemental airports, including Paine Field, as a preferred alternative.**"

### FAA Reality vs. Myth

- The airport receives funds from the FAA: TRUE
- Myth: The airport will lose federal funding if it prohibits air carriers. FALSE.
- **Reality:** the County CAN prohibit flights by air carriers.
- **Reality:** It must pursue a “Proprietor Exemption” process with the FAA.
- **Reality:** Paine Field can retain its federal funding (which is small anyway) of about \$2 million/year
- **Reality:** The Community can save over \$1 Billion in estimated costs
- **Reality:** Precedent set by Centennial Airport—they denied commercial airlines AND retained FAA funding and compliance. (49 USC §47107)

Myth: To remain compliant with FAA regulations, the airport “cannot do anything” if an air carrier wants to start operations at Paine Field.

- **FALSE**
- The airport must **ONLY** give aircraft clearance to land, allow use of “existing” facilities and allow take off.
- According to the FAA, the County has no obligation to build a terminal, issue permits for air cargo distribution centers, or otherwise spend any money to expand service at Paine Field
- If the County allows or encourages a carrier to operate here, it is voluntarily relinquishing such control.
- Once air service starts, carriers can use the FAA to defend their right to continue and expand operations without limit.

### Conclusion:

- Failure to put in proper economic controls and assertive rights will **IRREVOCABLY** open the door.
- The County CAN remain FAA compliant and “strongly discourage” commercial expansion at Paine Field at the same time.
- We can and should assert control over our own airport
- If this is not a good business plan for air carriers, why should anything less be a good business plan for the community?
  
- Other Communities said “No” King County said “NO!” to Southwest Airlines and Alaska Airlines 2 years ago, when they proposed flights out of Boeing Field.

### Noise? What Noise?

- The Airport will want to pay noise mitigation based on averaging out noise over a 24-hour period. Therefore the quiet times diminish the noisy aircraft time. Noise mitigation fees paid to home-owners are based on this model. As a result, few fees are ever paid to a majority of home-owners.
- Reality: We don’t listen to noise averaged over a 24-hour period.
- Loud “single event” noise disturbs us, undermines the learning environment for our children and wakes us up at night.

- A 747 taking off is 98 dB -106 dB
- Compare to standing next to a lawn mower at 98 dB; conversational speech at 60 dB
- Averaged over 24 hrs, according to the noise model, aircraft noise should not bother you.
- Does this allow you to sleep better when loud planes fly overhead?

**Let's talk TRASH: We will pay for air service - financially**

- **Lost property values, expected to be 10% - 25%** (see The Impact of airport Noise on Residential Real Estate, The Appraisal Journal, July 2001.)
- At the low end, 10% lost value could cost our communities over **\$1 Billion**
- Lowered tax revenues = lower home values, increased rentals, increased demands on government services and schools, cuts to police, fire, and general services.
- Creates a “downward spiral.”
- **Noise Mitigation costs: over \$200 Million** just for schools in Highline School District.

**Air Service Environmental Effect: We will pay - medically**

Study of Boeing Field vs. other Seattle communities found that, near the airport, residents had:

- 57% higher asthma
- 28% higher pneumonia/influenza
- 26% higher respiratory disease
- 83% higher pregnancy complications
- Airplane landings/take-offs are source of:
  - Benzene
  - 1,3 butadiene
  - Formaldehyde
  - Other carcinogens and non-carcinogenic particulates
  - Diminished Health (Columbia University studies)
  - Increased hypertension, stress, effects on the elderly and on pregnant women and their unborn children
- Source: “Take Back the Sky” and multiple studies referenced therein

Aircraft flight paths to Paine Field & Surrounding Communities—everyone is affected

**Air Service Noise We will pay - socially**

- “Schools exposed to high levels of aircraft noise are NOT healthy educational environments.” Lancet study

**The Lop-Sided Bet**

- Why make this lop-sided bet?
- The stakes are not fully understood
- But we know they are high, exceeding \$1 Billion

- The risks are not fully understood
- But we know the odds are stacked against a favorable outcome for our Quality of Life
- Scheduled air passenger and air cargo service means a high chance of losing big \$\$ and our Quality of Life

### **MRD Update = ILA !!**

- The proposed Interlocal Agreement (ILA) between Mukilteo and Snohomish County is the best possible update.
- The ILA will continue to emphasize a general aviation role for Paine Field
- The ILA will continue to “Strongly discourage” all other roles: (air cargo, scheduled air service)
- The ILA will make these ideas binding

### **Infrastructure Investment**

- We have \$1.5 Billion invested in a new 3<sup>rd</sup> Runway at Sea-Tac, scheduled to open next year. Paine Field airline service will cannibalize this investment.
- We have about \$1 billion invested in light rail (Sound Transit)—which is also scheduled to open next year.
- With \$billions invested in our ground and air transportation already, why cannibalize that with flights out of Paine Field, while also creating huge costs to Snohomish County’s communities?

### **Summary: don’t gamble away our quality of life on gambling flights to Las Vegas!**

- Airport expansion will negatively affect our Quality of Life and cost us a LOT
- Economically—\$ Billions at risk, funded by County taxpayers
- Quality of Life at risk—education, health, congestion, security, environment are all at risk
- We support job growth, but Economic Development means more than that.
- It means jobs AND a great community.
- The MRD gives us that balance now.
- The County made a promise to the people: A Deal’s a Deal!
- Now Seal the Deal—with the Centennial Rule.