



APPENDIX K

***Comments Received on Draft EA and Responses to  
Comments***



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Appendix K.1

***Agency Comments Received on Draft EA and Responses to  
Comments***

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## Introduction

Agencies that were previously invited to the agency scoping meeting and any agency or organization that provided a scoping comment during the scoping period received an email with the Draft EA notice of availability. The Draft EA review period lasted 42 days from April 12, 2024, to May 24, 2024, during which agencies could submit comments regarding the Draft EA.

The table below lists the agency that commented on the Draft EA, and their corresponding commenter number. The following pages list full comments followed by the responses.

Agency	Commenter Number
Snohomish County Conservation and Natural Resources	A-1
Ken Klein, Executive Director, Snohomish County	A-2
Marshland Flood Control District	A-3
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## Commenter A-1

**From:** [Cyndy Hendrickson](#)  
**To:** [Barrow, Julie](#)  
**Cc:** [Kandace Harvey](#)  
**Subject:** FW: Snohomish County Comments on Harvey Field Airport EA May 2024  
**Date:** Thursday, May 23, 2024 3:51:02 PM  
**Attachments:** [Snohomish County Comments Harvey Field Airport EA May 2024\\_final.pdf](#)

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**From:** Pozarycki, Kathleen <Kathleen.Pozarycki@co.snohomish.wa.us>  
**Sent:** Thursday, May 23, 2024 2:41 PM  
**To:** Cyndy Hendrickson <cyndyh@harveyfield.com>  
**Cc:** ilon.logan@faa.gov; Farris, Gregg <GFarris@co.snohomish.wa.us>; Stockdale, Erik <Erik.Stockdale@co.snohomish.wa.us>; Klein, Ken <Ken.Klein@co.snohomish.wa.us>; Harper, Lacey <Lacey.Harper@co.snohomish.wa.us>; Teigen, Tom <Tom.Teigen@co.snohomish.wa.us>  
**Subject:** Snohomish County Comments on Harvey Field Airport EA May 2024

Dear Ms. Cynthia Hendrickson:

1 Thank you for the opportunity to review the Environmental Assessment for the proposed Harvey Field Runway Improvement Project as posted on your project website April 12, 2024. Please see the attached letter from Snohomish County.

Thank you-

Kathleen

**Kathleen Pozarycki, MMA** | *Senior Planner II*

Puget Sound Recovery Lead/LIO Coordinator

[Snohomish County Conservation and Natural Resources](#) | [Surface Water Management](#)

3000 Rockefeller Ave, M/S 303 | Everett, WA 98201

O: 425-388-6414 | C: 425-754-5731 | F: 425-388-6455 | [kathleen.pozarycki@snoco.org](mailto:kathleen.pozarycki@snoco.org)

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NOTICE: All emails and attachments sent to and from Snohomish County are public records and may be subject to disclosure pursuant to the Public Records Act (RCW 42.56).

## Response to Commenter A-1

1. The email with attached comments is noted. See the Response to Commenter A-2 for responses.

Dave Somers  
County Executive

3000 Rockefeller Ave., M/S 303  
Everett, WA 98201-4046  
(425) 388-3464  
www.snoco.org

May 23, 2024

Ms. Cynthia Hendrickson  
Airport Manager  
9900 Airport Way  
Snohomish, Washington, 98296

Re: Harvey Field Runway Improvement Project Environmental Assessment

Dear Ms. Cynthia Hendrickson:

Thank you for the opportunity to review the Environmental Assessment for the proposed Harvey Field Runway Improvement Project as posted on your project website April 12, 2024.

1 County staff across several departments have conducted an initial review and would offer the following comments. A number of these comments may require additional attention prior to the completion of the Environmental Assessment (EA). These comments should also be considered prior to requesting Snohomish County review of this proposal for any necessary County permits, in order for the proposal to comply with local, state, and federal requirements and permits for which the County holds authority.

2 **Property Ownership**  
Snohomish County holds interest in parcel 28051300403000, directly north of the Airport Property. Additionally, the next parcel directly north (28051300402700) is owned by Burlington Northern Santa Fe (BNSF). Airport infrastructure and operations are present on both parcels. Harvey Airfield does hold a Special Use Permit with the Parks and Recreation division of the Conservation and Natural Resources Department for the use of the County parcel. However, the Special Use Permit only allows for the current use of the property and does not allow for any changes without County review and approval. No such coordination has taken place to date.

3 • Figure 1-11 Proposed Action: The Construction Staging Area appears to be shown partially within the County parcel. No coordination with the County has taken place regarding this location, and approval has not been granted. See marked up Figure 1-11 at the end of this letter.

4 • Section 3.1 Study Area: No mention is made of the property that the County holds interest in.

5 • 3.7.4.2 Proposed Action: This section states that the Proposed Action would occur entirely within the Study Area and would not require the physical use (direct use) of any Section 4(f) property. This statement is incorrect. In Figure 3-3, which represents the Study Area mentioned, parcel 28051300403000 is a Section 4(f) property owned by Snohomish County Division of Parks and Recreation. It is currently slated to be the alignment of the Snohomish River Regional Trail and is located within the Study Area boundary.

6 **Parks Regional Trail Plan**  
Snohomish County is concerned that the Runway Protection Zones (RPZs) for this proposal will impact both the Centennial Trail South and Snohomish River Regional Trail corridors. Development impacts from the airport have the potential to significantly impact the county's ability to complete and connect these trail corridors. Currently the RPZ for both the north and south ends of the runway overlap with these future regional trail corridors. There

6 is no mention of these trail corridors or the potential impact to the development of the regional trails within the EA.

- 7
- Section 3.7 Department of Transportation, Section 4(f): No mention is made in the analysis or methodology of the Snohomish River Regional Trail or Centennial Trail South corridors and the potential impacts to these properties from physical or constructive use.
  - Regional Trail Maps can be found here: <https://www.snohomishcountywa.gov/889/Park-Planning>

### Agriculture

8 Snohomish County is interested in minimizing impacts to Agriculture and complying with the State Growth Management Act. Policy LU 7.B.4. in the county's comprehensive plan states:

*"The county should work to find alternatives to the planning or construction of public or private infrastructure improvements such as electrical substations, sewer lines and treatment facilities and services on designated farmland. If located on or adjacent to designated farmland the county shall ensure that impacts on commercial agriculture are minimized."*

The Environmental Assessment needs to explain how the preferred alternative has minimized impacts to agriculture and whether it is or is not consistent with other county policy.

9

1. Figure 3-5: This Environmental Assessment reports that 5 acres of farmland will be removed due to Airport Rd relocation. It is not clear where these 5 acres of farmland are specifically located or what the impact to agricultural production would be. Please clarify the exact location of the proposed removed farmland as well as the impacts of removing this farmland.

10

2. Appendix F: The Environmental Assessment includes an evaluation of farmland impacts based on the United States Department of Agriculture (USDA) form, which indicates no significant impact on farmland according to Natural Resource Conservation Service (NRCS) standards. The evaluation was based only on compliance/standards with federal Farmland Protection Policy Act (FPPA), overseen by the NRCS, and no analysis was presented regarding compliance with the state Growth Management Act (GMA) or County policy. State court cases addressing GMA requirements for Ag lands have concluded that Ag lands were required to be designated and protected first (along with other resource lands and critical areas), before other elements of the GMA were addressed, which therefore implies "priority" for existing Ag lands over other proposed land uses. In addition, there is nothing in the GMA that prioritizes "Essential Public Facilities" over Ag lands. As a result, this proposal appears to be inconsistent with the state GMA as well as with County policy.

### Fish and Wildlife

11 Several fish and wildlife species listed as threatened or endangered under the Endangered Species Act are present within the proposed Action Area as described in Section 3 of the Appendix C: Biological Resources. These species include but are not limited to Chinook salmon, Steelhead, and Bull trout, and Southern Resident Killer Whales. These species are impacted by water quality degradation, so additional analysis is required to determine the likely impacts to water quality that may affect these species within the project's Action Area. Recent research by the Washington Department of Ecology has documented high levels of persistent organic pollutants (POP) in the Snohomish Estuary affecting out-migrating juvenile Chinook. Additional impacts to water quality due to stormwater runoff from runway use, repair, maintenance, firefighting, de-icing and other activities may lead to increased POPs and tire dust (6PPDQ) discharging to the Snohomish River. Full disclosure of these impacts may affect the NOAA/USFWS decision on whether the proposed runway improvements would constitute "a take" under the Endangered Species Act.

12

Appendix C: This appendix on Biological Resources (p. 61-62) provides copies of the letters sent by Harvey Field project sponsors to National Oceanic and Atmospheric Association (NOAA) and the United States Fish and Wildlife Service (USFWS) to request an informal consult under Section 7 of the Endangered Species Act. The current version of the Environmental Assessment does not include the responses to these letters. Snohomish County would like to ensure that further water quality impacts and impacts to threatened and endangered species do not occur as a result of this project. Snohomish County and many other regional partners have dedicated significant staff time and resources to support restoration of essential fish habitat within the Snohomish Estuary and nearshore habitat within the project's Action Area.

13

In addition to migratory fish species, there are many migratory bird species that pass through the Snohomish Estuary as they move between breeding and overwintering grounds. Of special note for this project would be the presence of Snow Geese. Additional research should be undertaken to determine the abundance and presence of Snow Geese as this could be a significant navigational and safety hazard. There are several birdwatching locations in the City of Snohomish near the proposed site and the project could affect recreation and birdwatching depending on the location and orientation of the RPZs.

#### References:

- [Chemical tracers guide identification of the location and source of persistent organic pollutants in juvenile Chinook salmon \(\*Oncorhynchus tshawytscha\*\), migrating seaward through an estuary with multiple contaminant inputs \(sciencedirectassets.com\)](#)
- <https://www.snohomishwa.gov/Facilities/Facility/Details/Riverview-Wildlife-Refuge-28>
- <https://snohomishcountywa.gov/DocumentCenter/View/7368/Appendix-D>
- [https://www.birdweb.org/BIRDWEB/ecoregion/sites/puget\\_trough/site](https://www.birdweb.org/BIRDWEB/ecoregion/sites/puget_trough/site)

#### Habitat/Critical Areas

14

New development in the Snohomish River floodplain, even behind established levees, makes any potential future habitat restoration within the floodplain at this location more challenging. There is an old oxbow of the Snohomish River within the area of interest (wetlands A and C). The assessment states that these wetlands are poor fish habitat and are inaccessible due to fish screens and migration blockages. If these depressional wetlands were to be reconnected to the mainstem of the Snohomish in the future, they could provide seasonal off channel habitat benefit to out-migrating juvenile salmon during spring flows. This proposal at Harvey Field would therefore reduce the potential for future habitat restoration improvements at this location.

15

Impacts to critical areas will be subject to review by Planning and Development Services (PDS) as the regulatory agency for private proposals. PDS would also be the lead State Environmental Policy Act (SEPA) department pursuant to Chapter 30.61 SCC.

#### References:

- Snohomish and Stillaguamish Rivers Flood Hazard and Climate Change Vulnerability Assessment <https://snohomishcountywa.gov/DocumentCenter/View/111495/Final-Vulnerability-Assessment-6-28-23>
- Snohomish Basin Salmon Recovery Forum Plans and Documents: [Publications | Snohomish County, WA - Official Website \(snohomishcountywa.gov\)](#)

#### Floodplains

16

1. Permit Summary Table 3-25 (pg. 3-115) does not include the habitat assessment that is required together with the County's Flood Hazard Permit. In addition, a biological assessment was prepared and included in Appendix C, which states that this project "may affect but is unlikely to adversely affect" Chinook salmon, that a Section 7 consult with USFWS and NMFS was initiated, and that the results will be included in the final EA (pg. 3-10). Please clarify and articulate how this BA addresses the issues raised in the previous 2006 biological assessment for Harvey Field that was prepared by NMFS for the

16

NFIP program, and the corresponding FEMA guidance.

[https://www.fema.gov/pdf/about/regions/regionx/nfip\\_ea\\_guidance\\_docs/habitat\\_assessment\\_guide\\_final..pdf](https://www.fema.gov/pdf/about/regions/regionx/nfip_ea_guidance_docs/habitat_assessment_guide_final..pdf)

17

2. Density Fringe – The environmental assessment reports that the area of fill covers only 1.6% of the Harvey property and therefore meets the “2% density” criteria for the density fringe (pg. 3-82). However, the EA appears to misunderstand that the “2 and 15” requirement works on a cumulative basis, not per project basis (Appendix 1, pg. 24). This analysis must include all structures added to (or removed from) the property since 1984, which is the date of the original flood study when the “2 and 15” was calculated as the thresholds for new development that would meet the “less than 1-foot rise” criteria.

Background on the original 1984 flood study: Based on all structures that were in place as of 1984 throughout the Density Fringe (DF), if everyone in the DF was allowed to increase the density on their property by no more than 2% (the maximum cumulative increase, not the maximum per project increase), then the flood rise would remain below the required 1-foot threshold. The 2% is a cumulative maximum that uses 1984 conditions as a baseline. Applicants are not allowed to continuously add structures to their property without considering all previous structures added since 1984. Once the cumulative 2% density has been reached, then any additional new development must be offset by equivalent demolition/removal of structures.

18

The EA reports the development site is 206.67 acres, all of which is located within the density fringe. However, ownership information on the EA maps is out of date, which itself is a relatively minor detail, except that this affects the denominator in the density calculation for assessing compliance with the 2% threshold. Two small parcels have been sold since the 2018 Airport Master Plan was published. Were these acreages (1.19 ac and 1.0 ac) included in the total (206.67 acres) used to calculate the density for compliance with the density fringe requirements? If they were included, then the calculation is incorrect.

19

Cursory analysis: Using County assessor data on structures built after 1984 and assuming that these structures all reduce flood storage, a review of historical aerial photos appears to indicate that no structures have been removed at this site since 1984.

- If the total site is correctly reported as 206.67 acres, then 2% coverage = **4.134 acres**. If the 206.67 acres should be reduced because two small parcels were sold, then the site size is reduced to 204.48 acres, and 2% of 204.48 = **4.09 acres**.
- 5 airplane hangars and one house were built after 1984, covering a total square footage of 76,762 sq.ft. = 1.76 acres. 1.76 acres plus the new proposal reported as 3.29 acres of fill = **5.05 acres**.
- It appears from this cursory analysis that the proposed preferred project would cause an exceedance of the 2% density threshold.

**A more robust analysis should be conducted to determine compliance with the 2% threshold; and if needed, present mitigation options.** Potential mitigation options could include removing obsolete structures or purchasing undeveloped land/development rights/conservation easements in the Density Fringe where 2% density allowance has not already been extinguished.

20

3. Flood Storage – This EA relies on storage analysis that was previously calculated for a larger project in the 2018 Airport Master Plan, in which the rise in flood elevation was determined to be consistent (within) the range allowed. For this new proposal, the assumption was made that since this is a smaller project than was proposed in the previous master plan, then the rise in flood elevation for this new

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proposal would also remain within the required thresholds. This assumption is insufficient and more detailed analysis of the rise in flood elevations should be conducted.

While the relocation of the road may not be subject to the “2 and 15” requirements described above, the fill needed to construct the road should still be evaluated for loss of flood storage and potential flood rise impacts.

21

The proposed action to reroute Airport Way intersects with a historic oxbow, which could be a flood routing feature. While the area is behind the Marshlands levee, in an extreme flood event that overtops or breaches the levee, the oxbow on site will likely be a flow path for floodwater. The proposed road path crosses the oxbow swale in two locations. Flood models should be studied further and considerations for flood flows should be incorporated into road designs to accommodate flooding and reduce hazards.

22

In addition, climate change considerations regarding future hydrology may create future flooding issues for the runway. The EA outlines that the density fringe area is only protected to 1 foot above the 5-year flood event and the project area is part of a flood storage area when the Marshlands Levee overtops. Since the EA is using the 500-year flood as their [FFRMS](#) threshold instead of climate modeling, there is no assessment or data on the increased frequency of inundation caused by the proposal. Additional study and modeling should be conducted to calculate the likely number of days that the runway could be impacted by future flooding scenarios as projected sea level rise may threaten existing levies. The current Marshlands levy adjacent to the Harvey Field airport site is designed to provide flood protection up to a 10-year flood under current conditions.

**Stormwater/Groundwater**

23

Description of existing conditions: The Harvey Field Airport does not currently have an industrial stormwater general permit (ISGP). Stormwater runoff from most of the project area will generally sheet flow to the west through vegetated fields, be collected in ditches, flow through culverts under SR 9, and then discharge into the river downstream of the airport. A portion of the stormwater runoff is conveyed to water quality facilities that treat the runoff from low flow rain events: one bioswale and, two infiltration trenches. The depth to groundwater is shallow (~4 ft).

24

1. There is inadequate separation between the bottom of the infiltration trench and the top of the groundwater table. The County Drainage Manual requires a minimum separation of at least 5 feet, provided that the soils are adequate.

25

2. The proposal includes new impervious surfaces = 5.7 acres, and site disturbance = 36.1 acres. The Environmental Assessment should describe the stormwater treatment facilities that will be proposed, and it should also address how pollutants from firefighting chemicals will be contained and disposed of. Infiltration trenches with perforated pipe are classified as Class V UIC (Underground Injection Control) wells. UIC wells are prohibited under the current version of SCC 30.62C.320 in areas rated as “high” for risk to groundwater. The entire site is rated as “high” risk for potential risk to groundwater (pg.3-102). The project proposes to use infiltration to manage runoff. Depending on the design, this may not be a viable option due to UIC prohibition and the depth to groundwater being roughly 4 feet (pg. 3-102), which may not allow for adequate separation and treatment.

**Infrastructure**

26

Snohomish County owns and maintains arterial roads throughout the County. Airport Way is a County Minor Arterial that is an important, and heavily traveled, connection between the City of Snohomish and SR 9. The EA does not provide any information on how the relocation of Airport Way will be paid for and who would be responsible for managing and constructing this road relocation project.

26

As a developer, Harvey Field would be responsible for the full cost of the relocation of Airport Way, including all mitigation requirements. This would need to be included in their environmental documentation as it is a direct impact of the runway project.

27

Depending on the number of expected visitors and size of the airport, potential wastewater treatment impacts will also need to be considered and addressed. For example, the environmental assessment should address whether the proposed new runway improvements would require updates to buildings to expand visitor access. It also needs to address how any additional wastewater produced by the site would be handled, such as whether the City of Snohomish wastewater treatment plant has sufficient capacity to treat additional wastewater or whether the airport plans to use a large onsite septic system.

### Wetlands

28

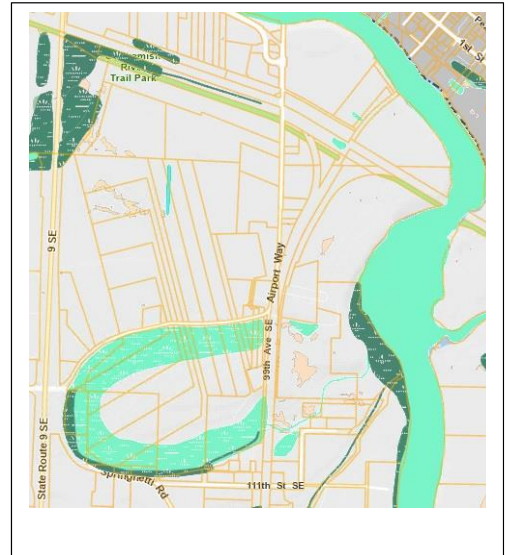
Potential wetlands are shown in the County Critical Area inventory (National Wetland Inventory (NWI) data) in an oxbow pattern south of Airport Road and located around the edge of Harvey property along Springhetti Road. Based on this County data, the RPZ and the associated fill, retaining wall and box culverts look to be placed within this large wetland. The EA contains internal inconsistencies between the EA wetland map (Figure 3-23) and the EA prime farm soils map (Figure 3-5). The EA prime farmland soils show "prime soils if drained" but the EA wetland map does not show these same areas as wetland. In addition, Figure 3-23 is inconsistent with county wetland data, and to a lesser extent, Figure 3-5 is also inconsistent with county wetland data. Impacts to wetlands and the corresponding wetland mitigation may not be properly accounting for in Section 3.16.1.



Fig. 3.23 Wetlands in EA



Fig. 3.5 Prime Ag lands in EA



Snohomish County Wetland data

29

1. The Sackett v. EPA supreme court decision in 2023 resulted in a divergence between the Corps of Engineers and the State of Washington with respect to wetland regulation. The Corps of Engineers no longer takes jurisdiction over certain types of wetlands that the state and the county regulate, some of which likely occur within the project area.
2. As a result, the Environmental Assessment limits the evaluation of wetlands to those that are subject to Section 404 of the Clean Water Act. The EA should also include evaluation of wetlands subject to requirements in SCC 30.62A and the State Water Pollution Control Act (RCW 90.48). For these reasons, we ask that the Department of Ecology and Snohomish County be asked to coordinate a jurisdictional

29

review of wetlands in the project area.

3. Mitigation proposed through wetland bank purchase is premature at this stage of the project. The conclusion of the EA states that impacts are caused only by road relocation, which does not appear to be accurate. It appears that the north end of RPZ and the south end RPZ would also impact wetlands.

30

The above comments should be addressed in the Final Environmental Assessment. Any comments not addressed may still need to be addressed in a separate environmental analysis or in permit submittal materials as required under state and county regulations as part of the local permit review process. This EA was not evaluated for completeness with respect to county permitting requirements. Additional issues may be identified in pre-submittal conferences or in the review of submitted permit application materials, particularly when the proposed project is described in greater detail.

Sincerely,



Ken Klein,  
Executive Director, Snohomish County

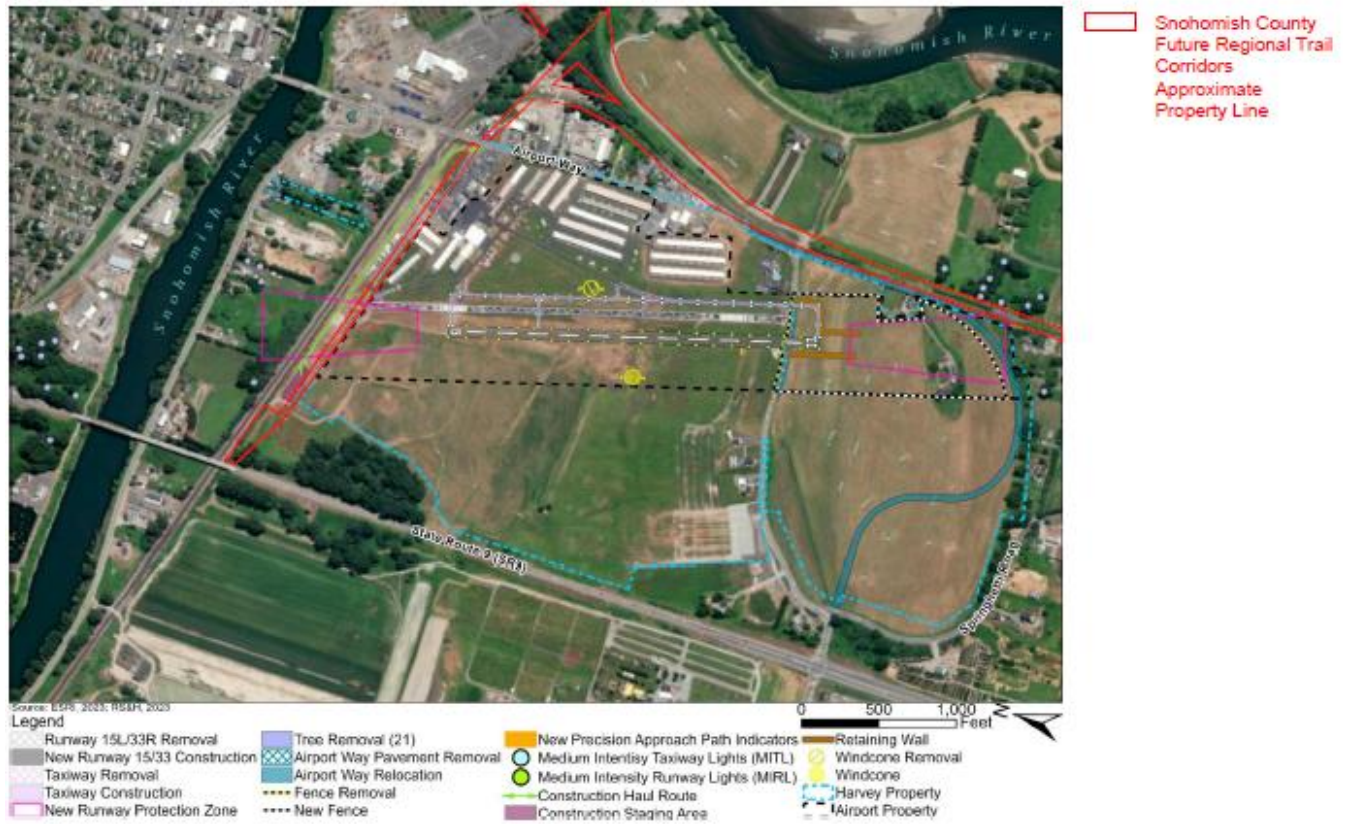
cc:

Dave Somers, Snohomish County Executive  
Lacey Harper, Snohomish County Executive Director  
Kelly Snyder, Snohomish County Public Works Director  
Mike McCrary, Snohomish County Planning and Development Services Director  
Tom Teigen, Snohomish County Department of Conservation & Natural Resources Director

Ilon Logan US Department of Transportation Federal Aviation Administration Northwest Mountain Region  
Seattle Airports District Office 2200 South 216th Street Des Moines, WA 98198

Purpose and Need and Proposed Action

Figure 1-11  
Proposed Action



## Response to Commenter A-2

1. The Draft Environmental Assessment (EA) will be updated as the Final EA and is intended to fulfill Federal Aviation Administration (FAA) requirements. The comments will be reviewed and addressed to ensure compliance with Snohomish County requirements.
2. The Airport Sponsor is aware of the terms of the Special Use Permit for the adjacent parcels and has relocated the construction staging area onto Harvey-owned property based on this comment.
3. The construction staging area has been relocated onto Harvey-owned property based on this comment. Figure 1-11 in the Final EA has been updated to show the location of the construction staging area, on the western side of Harvey property, along the northern side of Airport Way.
4. Section 3.1 in the Final EA updates the information regarding ownership of properties in the Study Area. Snohomish County owns parcel #28051300402700 and the Airport Sponsor has a facility license agreement from the County for parking and vehicle storage. The license agreement was renewed by the Airport Sponsor and Snohomish County and is effective from April 1, 2025, through March 31, 2026, with an option to extend the agreement for one additional year to March 31, 2027, at the sole discretion of Snohomish County.
5. Although Snohomish County Division of Parks and Recreation owns the parcel of land adjacent to the Airport, the Airport has a facility license agreement on the land for parking and vehicle storage through March 31, 2026, and the land is not currently a Section 4(f) resource as defined by the U.S. DOT Act of 1966 (49 U.S.C § 303). The license agreement was renewed by the Airport Sponsor and Snohomish County and is effective from April 1, 2025, through March 31, 2026, with an option to extend the agreement for one additional year to March 31, 2027, at the sole discretion of Snohomish County. According to the FAA 1050.1F Desk Reference, Section 4(f) properties are “parks and recreational areas of national, state, or local significance that are both publicly owned and open to the public.” The parcel of land designated for the Snohomish River Regional Trail is not currently open to the public nor is it currently used as a park or recreational area. The Snohomish River Regional Trail is currently in the design phase with no set opening date. Therefore, the Final EA does not consider this parcel as a Section 4(f) resource.
6. The Runway Protection Zones (RPZs) are imaginary surfaces that outline an area that are trapezoidal shapes meant to enhance the protection of people and property on the ground in the event of an incident within those areas. RPZs are not physical structures or development. Ideally an RPZ is entirely on Airport property. However, when an RPZ extends off airport property, attempts are made to reach an agreement with landowners to keep the RPZ free of structures, obstructions, and incompatible land uses. The RPZs on both runway ends extend into parcels that are planned for the Snohomish River

Regional Trail Corridors, but these trails do not currently exist and have no set opening date. The RPZs extend onto land owned by Snohomish County, the Burlington Northern Santa Fe railroad, and other private landowners. The Airport currently has a license agreement with Snohomish County for the land directly adjacent to the north of the Airport in the RPZ for parking and vehicle storage. The license agreement was renewed by the Airport Sponsor and Snohomish County and is effective from April 1, 2025, through March 31, 2026, with an option to extend the agreement for one additional year to March 31, 2027, at the sole discretion of Snohomish County. Additionally, the Airport Sponsor, FAA, and EA consultant met with the County in January 2023 to discuss these proposed trails and their proposed location to the Airport. FAA stated in that meeting that they do not support the location of the proposed trails due to the RPZs for the runway. Section 1.4.2.1 in the EA describes the existing obstructions to the RPZs and Appendix A in the EA contains more information regarding runway standards.

7. A Section 4(f) analysis was not conducted because there are no Section 4(f) resources in the Study Area that would experience a physical or constructive use because of the Proposed Action. Specifically, the Snohomish River Regional Trail and Centennial Trail South do not currently exist and are not available for public use. Therefore, these trails are not Section 4(f) resources and no analysis is warranted.
8. Section 3.8.4.2 in the Final EA describes the impacts to farmlands that would occur as a result of the Proposed Action. Farming activities would still occur on Harvey-owned property. Additionally, as stated in the Final EA, the Airport Sponsor coordinated with the U.S. Department of Agriculture Natural Resources Conservation Service for the farmlands using the Form AD-1006, Farmland Conversion Impact Rating. According to FAA 1050.1F Desk Reference, a significant impact would occur if the total combined score on Form AD-1006 ranges between 200 and 206. The Proposed Action would have no significant effect on farmlands because the total combined score on Form AD-1006 was 147 points, which is below the significant impact threshold of 200 points.
9. The blue outline in Figure 3-5 in the Final EA identifies the project components where Prime Farmland would be converted to pavement. Section 3.8.4.2 in the Final EA describes the impacts to farmlands because of the Proposed Action.
10. Section 3.11.4 in the Final EA describes how the Proposed Action would be compliant with County land use regulations. As stated in that section, the Airport Sponsor would coordinate with the County and apply for a Conditional Use Permit (CUP) or Development Agreement (DA) for the southern portion of the Study Area, which is currently zoned as Agriculture-10 Acre, to be consistent with County plans. Additionally, farming activities would continue to occur on Harvey owned property.
11. Section 7 consultation with the National Marine Fisheries Service (NMFS)/U.S. Fish and Wildlife Service (USFWS) has been completed and is summarized in Section 3.4.4 in the Final EA. The USFWS issued a Letter of Concurrence on October 2, 2024 for the effects on bull trout and designated critical habitat (see Appendix C in the Final EA). However,

NMFS held that the Proposed Action is likely to adversely affect Endangered Species Act (ESA)-listed salmonids, their critical habitat, and essential fish habitat for Pacific Coast salmon due to the effects from the pollutant 6PPD, and thus required formal Section 7 consultation. Therefore, a revised BA was prepared and submitted to NMFS on September 5, 2024 with an adverse effect determination (see “NMFS Consultation” in Appendix C in the Final EA). NMFS issued their Biological Opinion on June 26, 2025.

12. See the response to Comment #11 of this letter.
13. Snow geese (*Anser caerulescens*) are a migrant bird species commonly observed annually from early October until mid-May in the Snohomish Estuary and lower Snohomish River Basin during migration between summer nesting habitat in northern Alaska and wintering grounds in western Washington, Oregon, and California (Audubon Society 2024a, Cornell Lab 2024a and 2024b). The Proposed Action construction and operational activities would have no direct effects on the abundance of snow goose or quality of snow goose habitat because the Proposed Action would occur within the footprint of Airport property that has been previously disturbed. Snow geese are highly mobile and, similar to other goose species, are likely to exhibit avoidance behavior by relocating to other areas further from transient disturbances such as increased noise levels from construction machinery and from airport operations (Bradbeer et al 2017). A Wildlife Hazard Assessment (WHA) was prepared for the Airport in 2016 that documented snow geese flying over the Airport and using fields about a mile away from the Airport. The WHA did not observe any large-bodied birds, such as snow geese, landing on the airfield during WHA-related surveys. Following the completion of the WHA, a Wildlife Hazard Management Plan was completed in 2017 outlining minimization measures the Airport needed to undertake to reduce wildlife hazards at the Airport. To minimize any impacts to aviation activities and to bird populations, the WHMP states that:

“Hazard management for avian species will include regular observation and monitoring by airport staff, and non-lethal hazing to disperse birds as needed. If non-lethal hazing proves ineffective, lethal removal will be considered. Appropriate federal and state depredation permits will be acquired to support lethal removal of regulated birds.”

The Proposed Action would not expand the Airport or its operations (i.e., would not change the number or type of aircraft currently operating at the Airport) and the WHMP will be used during and after construction activities to avoid interference on Airport operations by snow geese.

The snow goose is occasionally observed at bird watching locations such as the Riverview Wildlife Refuge (Audubon Society 2024b; iNaturalist 2024) and the Proposed Project would not affect local bird watching and other wildlife-oriented recreation activities.

See the response to Comment #6 of this letter for a discussion on RPZs.

14. The Proposed Action does not propose development that would reduce the potential for future habitat restoration improvements in the floodplains around Harvey Field. Proposed construction and operations activities resulting from the Proposed Action would occur above the Ordinary High-Water Mark (OHWM). In conjunction with the County Flood Hazard Permit, a Habitat Assessment and Habitat Mitigation Plan would be submitted to Snohomish County. No project components would permanently or irreversibly limit/reduce the potential for future restoration efforts or unduly impose barriers to those efforts that could not be addressed by typical restoration planning and design.
15. The comment regarding Washington's State Environmental Policy Act (SEPA) and impacts to critical areas is noted; however, SEPA would be completed independently of this EA and this EA does not address SEPA requirements.
16. The Biological Assessment developed and used for ESA Section 7 consultation with USFWS and NMFS will be submitted to Snohomish County in conjunction with the County Flood Hazard Permit. Section 3.16.2.4 in the Final EA has been revised to indicate this additional permitting requirement for the County Flood Hazard Permit.
17. Section 1.1.3 has been added to the Final EA to document the history of density fringe regulations at the Airport. The Airport was not subject to the density fringe requirements until 2005 when changes in the FEMA regulatory floodplain brought the Airport within the density fringe floodplain. New development at the Airport has not occurred since 2005; therefore, the Final EA analyzes how the Proposed Action alone adheres to density fringe requirements. Upon final design and during the permitting process, coordination with the County will occur for obtaining the County flood hazard permit.
18. The Final EA has been updated to reflect the corrected acreage numbers. Removing the two small land parcels that the Airport Sponsor sold since the completion of the 2018 MP resulted in 204.48 acres of Harvey property in the density fringe area. The Proposed Action would result in 3.3 acres of fill. These updated acreage numbers result in 1.6 percent of fill on Harvey property, below the two percent allowable for the Proposed Action.
19. See response to Comment #17 of this letter for a history of density fringe requirements at the Airport. The Final EA has been updated to reflect the correct acreage numbers for the entire development site, which is 204.48 acres. The analysis in Section 3.16.2 in the Final EA has been updated to reflect the correct total acreage. As airfield improvements associated with the Proposed Action would result in 3.3 acres of fill (see Figure 3-28 in the Final EA), the Proposed Action would result in a density fringe fill of 1.6 percent. The Proposed Action fill remains below the 2% density fringe fill restriction based on development since 2005, when the Airport was brought into the density fringe. See Appendix I in the Final EA for more details on density fringe.

20. Appendix I in the Final EA has been revised to include floodplain modeling for the Proposed Action. Floodplain modeling that was inclusive of airfield and roadway improvements indicate that the FEMA-established BFEs would not increase as a result of the Proposed Action for the regulatory 100-year (one percent-annual-chance) flood event. Additional floodplain modeling will be conducted in final design and the Proposed Action will be required to demonstrate that it does not contribute to a cumulative increase in Base Flood Elevations (BFEs) that exceeds the limits prescribed in the Snohomish County Code 30.65 to obtain the County Flood Hazard Permit.
21. Culverts are proposed along relocated Airport Way along the primary flowpath for the drainage basin for Hanson Slough (see Figure 3-35 in the Final EA). These proposed culverts would accommodate floodwaters in an extreme flood event. The location, number of culverts, and culvert sizing will be completed in final design. Appendix I in the Final EA has been revised to include floodplain modeling for the Proposed Action. Floodplain modeling that was inclusive of airfield and roadway improvements indicates that the FEMA-established BFEs would not increase as a result of the Proposed Action for the regulatory 100-year (one percent-annual-chance) flood event. Additional floodplain modeling will be conducted in final design and the Proposed Action will be required to demonstrate that it does not contribute to a cumulative increase in Base Flood Elevations (BFEs) that exceeds the limits prescribed in the Snohomish County Code 30.65 to obtain the County Flood Hazard Permit.
22. Executive Order 14030, which reinstated the Federal Flood Risk Management Standard (FFRMS), was revoked in early 2025; therefore the standards established in the FFRMS are no longer applicable for the Proposed Action and have been removed from the Final EA.
23. Description of depth to groundwater has been clarified in the text in Section 3.16.4.3 in the Final EA and in Appendix I in the Final EA.
24. The existing infiltration trenches are at a higher elevation on the site and meet the minimum separation to groundwater of 5 feet. The Proposed Action does not improve or modify the existing infiltration trenches, nor does it affect groundwater elevations. Proposed permanent stormwater facilities will be designed to meet minimum design standards described in the Snohomish County Drainage Manual.
25. Text has been revised in Section 3.16.3.4 in the Final EA and in Appendix I in the Final EA to remove infiltration trenches as a possible permanent water quality facility due to prohibition of Class V Underground Injection Control (UIC) Wells in areas with high aquifer sensitivity. Under the Proposed Action, one of the existing infiltration trenches would be demolished and the other is upstream of the Proposed Action and would not be modified.
26. The Airport Sponsor would pay for the construction of the road relocation. An agreement between the County and the Airport Sponsor regarding construction management would

occur during final design of the Proposed Action. The EA identifies the necessary mitigation measures regarding the Airport Way relocation.

27. As stated in Sections 1.4.1 and 1.5 in the Final EA, the Proposed Action would not result in an increase in activity at the Airport, and only seeks to meet current FAA standards for Runway 15L/33R for RDC B-II (small) aircraft while providing for sufficient runway length for the Airport's critical aircraft grouping. Therefore, no upgrades to facilities are included as part of the Proposed Action.
28. The Final EA discusses Farmlands (see Section 3.8 in the Final EA) and Wetlands (see Section 3.16.1 in the Final EA) separately in accordance with FAA Order 1050.1F. Publicly available GIS data and maps such as the National Wetlands Inventory (NWI) are used for determining the potential presence of wetlands. However, these maps can be inaccurate and are not as reliable as a field delineation conducted to determine the presence of wetlands. A wetland delineation occurred in 2023 and identified four wetlands in the Study Area, shown in Figure 3-23 in the Final EA. Mitigation measures for wetlands impacts are described in Section 3.16.1.5 in the Final EA and are consistent with FAA Order 1050.1F. Appendix H in the Final EA contains the Wetlands Report, which includes the wetlands delineation methods and results.
29. A jurisdictional determination of wetlands for the project area will be coordinated with the U.S. Army Corps of Engineers and Washington State Department of Ecology during final design.

The mitigation measures proposed in Section 3.16.1.5 in the Final EA are not final and would be subject to the jurisdictional determination and U.S. Army Corps of Engineers Section 404 permit.

The Runway Protection Zones (RPZs) are imaginary surfaces that outline an area that are trapezoidal shapes meant to enhance the protection of people and property on the ground in the event of an incident within those areas. RPZs are not physical structures or development. Ideally an RPZ is entirely on Airport property. However, when an RPZ extends off airport property, attempts are made to reach an agreement with landowners to keep the RPZ free of structures, obstructions, and incompatible land uses. See the response to Comment #6 of this letter for additional discussion on RPZs.

30. The Final EA addresses all comments received during the Draft EA comment period. The Final EA has been updated to ensure any applicable county permits are accounted for in the proper mitigation measures sections.

References for Responses to Commenter A-2:

Audubon Society (National Audubon Society), 2024a. Bird Migration Explorer. Snow goose (*Anser caerulescens*) Migration Map. Accessed June 13, 2024. Available at: <https://explorer.audubon.org/explore/species/1501/snow-goose/migration>.

Audubon Society, 2024b. Riverview Wildlife Refuge Bird Check List. Accessed June 13, 2024. Available at: [https://www.snohomishwa.gov/DocumentCenter/View/4298/RiverviewRefuge\\_BirdingBrochure?bidId=](https://www.snohomishwa.gov/DocumentCenter/View/4298/RiverviewRefuge_BirdingBrochure?bidId=)

Bradbeer, D.R. et al, 2017. Crowded skies: Conflicts between expanding goose populations and aviation safety. *Ambio*, Volume 46, pages 290–300. Accessed June 13, 2024. Available at <https://doi.org/10.1007/s13280-017-0901-2>.

Cornell Lab (Cornell Lab of Ornithology), 2024a. eBird: Snow goose distribution and abundance maps. Accessed June 13, 2024. Available at: <https://science.ebird.org/en/status-and-trends/species/snogoo/abundance-map>.

Cornell Lab, 2024b. Cornell Lab of Ornithology eBird database. Accessed June 13, 2024. Available at: <https://ebird.org/region/US-WA-061?yr=all>.

iNaturalist, 2024. iNaturalist Research-Grade Observations. Accessed June 13, 2024. Available at: <https://www.gbif.org/dataset/50c9509d-22c7-4a22-a47d-8c48425ef4a7>

# MARSHLAND FLOOD CONTROL DISTRICT

P.O. Box 85 · Snohomish, WA 98291-0085  
360-568-6044 · [marshlandfloodcontrol@gmail.com](mailto:marshlandfloodcontrol@gmail.com)

May 22, 2024

Cynthia Hendrickson, Airport Manager  
9900 Airport Way  
Snohomish WA 98296

<https://harveyfield.mysocialpinpoint.com/en/home/cyndyh@harveyfield.com>

Re: Comment Letter on Harvey Field EA

Ms. Hendrickson:

1

Harvey Field is located within, and pays assessments as a member of, the Marshland Flood Control District (Marshland). Marshland is a 6,110.57 acre Special Purpose District operating under RCW Chs. 86.09 and 85.38. It is an Agricultural District with two statutory missions: (1) to keep out floods of the 5 to 10 year variety and minimize large floods by controlling overtopping with 8 miles of federally constructed earthen dikes, known as levees, and (2) to maintain a federally constructed drainage system and Pump Plant with 6 pumps (2-100hp and 4-250hp) in order to return storm and flood water to the Snohomish River and drain the valley as quickly as possible after floods of all magnitude, as well as to reduce the water table in order to improve agricultural activities on its long-term commercially significant prime agricultural land, including some Prior Converted Wetland. Harvey Airfield is, therefore, receiving the benefit of both Marshland levees and Marshland drainage while it operates a use which is subservient to Marshland's agricultural purposes. As a Marshland assessment-paying member, Harvey Airfield's proposed Airport Way relocation and runway extension into Hanson Slough is not opposed lightly as a "scare campaign" or by not "concentrating on and reading the science."

2

Marshland has 117 assessment paying households, each of which has two (2) votes (about 230 individuals), of which the Airfield is only one (1). Marshland is governed by we three elected Commissioners. Each of us is from a family with 4 or 5 generations and over 100 years of farming in this valley. Each of us are in our 60's and not prone to panic or exaggeration. Other Marshland members also have extensive multi-generational farm family connections in the southern third of the District, including Keith Stocker, Mike Bueler (from whose family the Airfield bought Hanson Slough) and Kurt Thompson. These long-term families have produced past and present members, officers and elected officials on governmental bodies including the Snohomish County Agricultural Advisory Committee, the County Council and even the State Senate. Please consider Marshland's Comments below with an open mind and with the respect due them in light of

2 Marshland’s knowledge based on experience and Marshland’s responsibility to its entire assessment-paying membership affected by the Airfield’s proposal.

3 **Objective Analysis or Subjective Advocacy?**

An Environmental Assessment (EA) should be an objective analysis of impacts to be expected from a proposed development. Harvey Field’s EA makes no attempt to provide an objective analysis. It is a piece of advocacy asserting that regulatory provisions necessary to its desired outcome can be met if one is persuaded by discussions which ignore (1) impacts from flooding which have occurred for the past century or more,<sup>1</sup> (2) bird strike impacts which have occurred for the past decade or more,<sup>2</sup> (3) the lack of improvement in any traffic impacts occurring on a daily basis<sup>3</sup> and (4) the key role Hanson Slough plays in collection, storage and drainage of storm and flood water.

4 **Public Health, Safety and Welfare**

Also ignored is any discussion, much less analysis, of the public health, safety and welfare that would be promoted by authorizing the two-part (1) road relocation to permit (2) a runway extension proposal. Why? Because there is no public benefit to relocating Airport Way or extending the runway.

5 **The Runway Extension**

The runway extension – better described as a runway “encroachment”<sup>4</sup> – has no public health, safety and welfare benefit. It would allow one (1) lone aircraft that uses the Airfield, a single Cessna Caravan aircraft, to fit within preferred runway length standards.<sup>5</sup> Does this sole aircraft serve the public health, safety and welfare by providing essential services to the Snohomish area? No. It serves a private recreational skydiving business whose customers, Marshland believes, are probably and predominantly, residents of the King County/Seattle area 35 miles from the Airfield, not Snohomish locals. Does this single skydiving customer carrier “need” the runway extension? No. It has been operating with the present runway for several years – without accidents or incidents related to a shorter than preferred Caravan-standard runway. There is no public health, safety or welfare need. The remedy is to have the Airfield remain as is and only permit aircraft which fall within the standard for the present runway length.

<sup>1</sup> See Barbara Bailey’s Comment Letter of May 4, 2024.

<sup>2</sup> See Exhibit 1, WSDOT Bird Strike Letter following email from Kandace Harvey

<sup>3</sup> See quotations from EA Pages 1-7, 3-60 and 3-61 below.

<sup>4</sup> EA Page 1-10, Section 1.2.2, regarding Airports as Essential Public Facilities (EPF), cites to RCW 36.70.547 as a regulation to “discourage adjacent siting of incompatible land uses” and is “intended to protect public use GA airports from encroachment by incompatible land use.” But it is the Airfield which is trespassing beyond the UGA boundary and encroaching on the farmland which pre-existed the Airfield by at least four (4) decades.

<sup>5</sup> EA Page 1-13, Section 1.3.1

6

### Airport Way Relocation

What about the justification for the proposed Airport Way relocation? Does it have a public health, safety and welfare benefit? No traffic study was included in the EA. No benefit is even discussed, suggested or asserted. Therefore, the EA implicitly acknowledges that there will be no benefit because there will be “no change” in traffic which it admits is congested.

#### Page 1-7, Section 1.1.2:

Airport Way is a rural major collector roadway ... [and] serves about 11,000 average daily trips with a level of service (LOS) E, which is defined as unstable traffic flow with significant delays. The delay occurs at the SR9 signal, which is exacerbated by southbound traffic at the stop-controlled intersection of Springhetti Road and Airport Way.

#### Page 3-60, Section 3.14.2.3:

Airport traffic is anticipated to continue to use the relocated Airport Way at the same traffic volume as with the No Action Alternative. Since the volume of traffic using the relocated Airport Way would not change under the Proposed Action, there would be no decrease in LOS.

#### Page 3-61, Section 3.14.2.4:

The proposed Action is not expected to generate additional vehicle trips or increase the volume of traffic using Airport Way, and as such it is not expected to significantly affect surface traffic.

7

### **The “Public Work” Exemption Requires A Significant Public Benefit Of It Is A “Private Work”**

If there is no public health, safety and welfare benefit from the proposal to relocate Airport Way, how can it be justified as a “Public Work”? Snohomish County alone, not Harvey Airfield, can establish a proposed road relocation as a “Public Work.”<sup>6</sup> Would Snohomish County initiate use of its “Public Work” exemption from the 2%/15% density fringe regulations in order to relocate a road into and crisscrossing a major floodplain storage area if there were no benefit achieved for traffic congestion at a major intersection of four (4) rural arterials? No. Therefore, relocating Airport Way has no public health, safety or welfare purpose and is, in fact, a “Private Work” proposal which should (i.e. “must”) meet the 2%/15% density fringe regulations.

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<sup>6</sup> In her June 2, 2022 Memorandum to Kandace Harvey, Julie Barrow of RS&H wrote in the middle of page 3 that: “According to RCW 39.04.010 public work means all work, construction, alteration, repair or improvement other than ordinary maintenance, *executed at the cost of the state or of any municipality ... (Emphasis supplied)*” How can the Airfield argue relocation would be a public work if the Airfield pays for relocation and would then “dedicate the proposed right-of-way to Snohomish County Public Works upon construction completion”? EA Page 3-81.

## 8 The “Public Work” Exemption Requires Maximum Mitigation

Moreover, if proposed relocation of Airport Way were initiated by Snohomish County to benefit traffic congestion or some other public health, safety and welfare purpose, the County would have the obligation to design and build the relocated road to minimize stormwater and flood flow impacts. FEMA would require that. The “do not cause a cumulative increase in the [floodwater displacement] of more than one foot” requirement is a “maximum allowable” impact<sup>7</sup> and, therefore, a “minimum” design requirement for mitigating impact. The effort in a regularly flooded area should always be to “minimize” impacts of a “Public Work.” The exemption is not a free pass, but a special dispensation if there is an overriding public health, safety and welfare necessity for a “Public Work” in a floodplain area. The impact must still be mitigated as much as possible.

## 9 Maximum Mitigation Would Require Culverts All Along Relocated Airport Way

Therefore, the proposed relocated Airport Way design should seek to mimic as closely as possible stormwater and flood flow in Hanson Slough as it currently exists. That means, as Kandace Harvey, her Airfield Manager, Cyndy Hendrickson and their Aviation consultants, Donna Taylor, Renee Dowlin and Hugh Mortenson, promised on May 11, 2015, while attending Marshland’s regular monthly meeting, relocated Airport Way must be “built on pilings.”<sup>8</sup> That would allow storm and flood water to pass through Hanson Slough in a way which matches the Slough’s current size, shape and drainage as nearly as possible. That was “the science” in 2015. Then in September 2016 the Airfield circulated a schematic showing 13 culverts under the proposed road.<sup>9</sup> That was “the science” in 2016.

## 10 A Solid Fill for Relocated Airport Way Would Increase Bird Strikes

Harvey Airfield mentions culverts as a possibility on EA Page 3-97, referencing Figure 3-35, but makes no written commitment or proposal for, nor any very visible depiction of culverts as, part of the proposed relocation of Airport Way. Rather, Harvey Airfield seems to suggest that the “Public Work” exemption would be a free pass to make the relocated road embankments exist as a solid fill. This would reduce the flood storage size of Hanson Slough, raising water level and slowing drainage. Harvey Airfield already struggles with “bird strikes” from water fowl using Hanson Slough during the wet season. The Airfield even solicited a State Department of Transportation, Aviation Division letter about this in January, 2016.<sup>10</sup> Ironically, “bird strikes” will be more probable by reducing Hanson Slough flood storage size, increasing water height and slowing drainage. The Airfield ought to be advocating for culverts and should have

<sup>7</sup> EA Page 3-78 citing SCC 30.65.260 in footnote 159.

<sup>8</sup> See Exhibit 2.

<sup>9</sup> See Exhibit 3.

<sup>10</sup> See Footnote 2.

10

“Environmentally Assessed”<sup>11</sup> what would be needed to mimic storm and flood storage and flow as much as possible. The EA made no such attempt and, in fact, deliberately avoided such analysis by asserting the “Public Work Exemption” as a free pass. That is a complete Failure to make a professional, much less, objective, assessment.

11

### **Following the Science**

The HERALD article on May 17 quotes the Airfield as suggesting that Marshland is not “sticking to the data” and “the science.” Exactly what data and science is not specified but it seems this will be the Airfield’s chosen “soundbite” attempting to undermine opponents of its proposal. Based on the EA, “the science” would appear to be a reference to the Base Flood Elevation or “BFE” which shows a “net zero” rise in the “500-year floodplain” water level. This is consistent with EA Page 3-74 which appears to have selected the 500-year flood as its BFE, even though FEMA maps use the 100-year flood.

Few of us, however, will live to be 100 and none of us will live to be 500 so the 1% and 0.2% statistical probability of occurrence is not the issue. Likewise, the EA’s “not cause a cumulative increase in the floodwater displacement of more than one foot”<sup>12</sup> in these floods is irrelevant to considering the impacts from 5, 10, 15, 20 year and other less than 100- or 500-year floods. It is these smaller “frequent” floods whose impacts have been historically documented by Barb Bailey’s May 4, 2024 Comment Letter. The impacts on these lesser, but still powerful (“explosive,” “tidal wave”), floods are what are relevant and, frankly, critical to a proper “Environmental Assessment.” To make such an assessment requires an understanding of how and why flood flow and drainage came to be, how and why it works and how and why it would be adversely affected by the Airfield’s proposal. Some history is required.

12

### **Diking and Drainage**

Since 1895 Washington’s legislature has adopted 17 chapters in Title 85 of the Revised Code of Washington (RCW) authorizing formation and operation of Dike and Drainage Districts in recognition of the importance of protecting against smaller floods and draining areas with high water tables. Since 1935 the State Legislature has adopted 11 RCW Chapters on Flood Control in Title 86. Marshland was originally two Drainage Districts. The Airfield was part of District 1. Marshland was formed in 1952 and took over the responsibilities of both Districts, which dissolved, in 1990. The relevance is that Marshland has been involved in solving drainage issues for 100 years or more.

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<sup>11</sup> Environmental Justice is mentioned, but only partially discussed, in the EA at page 3-61. There are two components, but the EA only discusses the second. The first is the “context and necessity of potential environmental impacts.” Instead of analyzing and assessing impacts in Hanson Slough from relocating Airport Way, and the necessity of installing culverts throughout the road, the EA merely references the County’s Public Work exemption as a free pass.

<sup>12</sup> Page 3-78 quotation of SCC 30.65.260 in footnote 159.

### Batt and Hanson Sloughs

Batt Slough is mentioned only once in the EA at the very bottom of Page 3-7 with no details of importance. This is a major concern because, as the Airfield is aware, Hanson Slough drains into Batt Slough through the 1,100-foot-long culvert the EA mentions on Page 3-7. The EA fails to mention, however, that the culvert is only 18 inches in diameter. Moreover, a row of cottonwood trees, commented on at Page 3-10 of the EA in connection with approach and departure obstructions, has grown up around this 18-inch culvert and the tree roots often plug it up. Further, on the Batt Slough end of the culvert there is a “tide-gate” that prevents Batt Slough from draining water back to Hanson Slough. That also means, however, that Hanson Slough can only drain into Batt Slough after Batt Slough has drained into the Snohomish River. And that means the Snohomish River must be lower than high tide in a non-flooding state. Bottom Line: If the Snohomish River is at or above high tide in a non-flooding situation, Batt Slough cannot drain and Hanson Slough cannot drain. The entire length of time Hanson Slough is storing water after a flood, waterfowl are attracted to it, especially during their migratory periods in Fall and Spring – flood season. Yet the EA did its biological visit in June of 2023 which had “lower than average” rainfall and only mentions songbirds in Section 3.4 on pages 3-5 to 3-8.

Again, a little history goes a long way. Batt and Hanson are “sloughs” which means they were inlets from the Snohomish River which were tidal backwaters. They were both low lying areas open to the river in the past and into which water flowed during high tide and then subsided during low tide. Both have now been cut off from any direct connection to the river. A 324 foot long, 48-inch diameter culvert running under the levee, with a cast iron tide gate on the river side of the levee was installed in 1947 at Batt Slough. In the 1950s, Hanson Slough’s connection to the river was filled in, leaving a large muddy, marshy low area with brackish swamp water for decades. The only outlet was an open ditch from Hanson to Batt Slough through what was then, and still is now, Kurt Thompson’s family’s property.

Because the open ditch was filled in with silt by the 1975 flood, an 18-inch diameter culvert with two 6-inch laterals was put in to drain the Thompson, Houck and Bueler properties based on a design by the Soil Conservation Service (SCS). The design was faulty and replaced at some point, again with an SCS design. Then, after the 1990 flood, more repair occurred. The Bueler family, which owned Hanson Slough as well as other farm property at the time, worked with the SCS to better drain Hanson Slough by repairing the 1,100 foot long, 18-inch diameter culvert from Hanson to Batt Slough, but probably without a tide gate on the Batt Slough end. That 18-inch culvert drains an open ditch in Hanson Slough which also collects run-off from several other properties, including a number on Springhetti Road. It used to extend to the centerline of Marsh Road as well. The agreement to put in the 18-inch culvert was “a handshake between Frank Bueler and Mr. Thompson.”<sup>13</sup>

<sup>13</sup> See Exhibit 4, an email which Kandace Harvey supplied to Marshland in 2015 which included a 1991 letter from Frank and Mike Bueler. Since Kandace supplied this information to Marshland, she could and should have supplied it for the EA.

13

While the portion of the ditch running to Marsh Road disappeared when Hwy 9 was improved to a divided highway a number of years ago, Hanson Slough still receives drainage from properties north of the Marshland flood canal crossing Baileys' property. This drain into Hanson Slough can be seen under Springhetti Road near the Big Tree Nursery.

In the late 1990's, vandals propped open the cast iron tidegate outside the levee at Batt Slough. When an early "surprise" high water occurred, it backed into Batt Slough. Due to the lack of a tidegate on the end of the 1,100 foot long 18-inch culvert draining Hanson Slough, the highwater backed up into Hanson Slough as well. As a result, 25 acres of Bueler corn in Hanson Slough was destroyed and 10 acres of turf on Stocker's farm along Batt Slough were also lost. To protect against the vandalism, Marshland installed a tide gate inside the levee near the beginning of the 324-foot, 48-inch diameter culvert leading to the cast iron tidegate on the culvert's riverside.

This action attracted attention from several County, State and Federal agencies which led to a grant for a hydraulic tidegate on the riverside which would remain open until water reached the top of the horizontal gate and would then close. The idea was to allow Batt Slough to be "flushed" with high tide water twice daily, but protect Batt Slough from river water entering above the high tide level. The hydraulic tidegate worked well for several years until the force of high water carrying debris during flood stage damaged it beyond repair. Marshland then sought an amendment to its Hydraulic Project Approval (HPA) so that an aluminum flap gate could be installed. Now, both the flap gate and inside tidegate are lifted in the Spring, after high water periods are safely past, and lowered in the Fall before high water is predicted and throughout the Winter until the following Spring. Also, at some point after the Airfield purchased Hanson Slough, it had a tidegate installed at the Batt Slough end of the 18-inch culvert draining Hanson Slough.

14

#### Railroad Trestles

Railroad trestles were established in locations throughout Marshland where sloughs and other water bodies were located and storm and flood waters had been observed to flow. One of these trestle areas exists east of 99<sup>th</sup> Avenue SE where relocated Airport Way is proposed to be constructed. This is an area which allows flood flow. Therefore, it is a major concern that the Airfield's present proposal makes no commitment to culvert the proposed road location there (or anywhere else). Moreover, as noted earlier, this is entirely contrary to "the science" of prior Airfield proposals.

Specifically, earlier attached as Exhibit 2 is the first page of Marshland Minutes from May 11, 2015 when the Airfield and its prior consultants advised Marshland that "Relocation of the road would require that it be built on pilings and the runway might also have to be built over culverts to allow adequate drainage." Moreover, also earlier attached as Exhibit 3 is a 2016 schematic of the proposed runway and relocated road showing the proposed road west of the trestle with eight (8) culverts to allow flow and at least another five (5) culverts spaced under the

14 rest of the proposed road. Also, in this 2016 schematic there are four (4) additional large culverts placed under the furthest extension of the proposed runway. These are in addition to the 9 culverts proposed now in the shorter portion of the proposed runway extension. In other words, the prior 2016 Airfield “science” had four (4) more culverts under the proposed runway than the current proposal.

15 SWM Creation

Although it has no direct connection to the Airfield drainage issues, Marshland has proof of other drainage issue expertise. Based on the 1970’s development of the eight (8) mile hillside along the western boundary of Marshland, former Chair, the late Don Thomas, brought the County’s attention to increased stormwater and, worse, sediment filling Marshland’s floodplain ditches. As a direct result of that contact, the County Surface Water Management (SWM) Division was created under the Public Works Department. SWM was originally created for Marshland alone!<sup>14</sup> Over time, SWM has grown to take on management of stormwater throughout the County and many other related issues as well. SWM is now a Division under the Department of Conservation and Natural Resources.

16 Levee Elevation

One aspect of Marshland’s long association with SWM relates to monitoring levee elevation throughout the Snohomish River Dike, Drainage and Flood Control Districts. That is another piece of history.

In the late 1950’s, the Eisenhower Administration began creating federally designed and constructed levee systems for both the Marshland and French Slough Flood Control Districts. The SCS managed the project and designed levees that would overtop in a 5-year flood. The federal project was finished in the late 1960s. This SCS (now NRCS) 5-year flood standard was at odds with the US Army Corps standard of the 10-year flood. Thus, a so-called “dike war” arose in the valley as Marshland, a wealthier district, began to raise its levee heights periodically to the Corps standard. In response, other districts formed the Coordinated Diking Council (CDC) in 1989 and set levee height at the 5-year standard until 2010.<sup>15</sup> Marshland refused to join. But then came the 1990 flood. Ironically, higher levees did not help Marshland, but left it with greater damage.

At the Silver King Restaurant (now Todo Mexico) in December 1990, Federal, State and County Officials advised Marshland that, if it wanted financial assistance, it had to join and comply with the CDC 5-year standard which allows extra height to the 10-year Corps standard 100 feet on either side for structures close to the levee. Marshland agreed and formally joined in March 1991.<sup>16</sup>

<sup>14</sup> Former County Code Chapter 24A.

<sup>15</sup> See Auditor File No. (AFN) 8911150431.

<sup>16</sup> See Exhibit 5.

16

Since 1991, when there have been overtopping floods, “If anyone gets wet, everyone gets wet.” And there have been fewer major levee breaches. The uniform system of levee height has made a believer out of Marshland as well as every other district on the Snohomish River. Accordingly, the CDC Agreement was renewed in 2010 for another 10 years<sup>17</sup> and renewed again in 2021 for another 20 years, until December 31, 2041.<sup>18</sup>

This history is relevant because it is the 5-year flood standard to which levees are held. That means it is floods of 5-, 10-, 15- and 20-year magnitude, not the 100 and 500 BFE’s, which need to be planned for and analyzed in terms of the Airfield’s proposal to relocate Airport Way in order to extend its runway.

17

### Flood Frequency and Threat

The Airfield says to follow “the science” but reading the EA and studying its Figures gives little confidence in the EA’s analysis of river dynamics. At the top of Page 3-84 the EA states “the Study Area is located on the *inside* of a bend of the Snohomish River.”<sup>19</sup> This is absolutely incorrect! Looking at EA Figure 3-28 on Page 3-83, Figure 3-29 on Page 3-85 and Figure 3-30 on Page 3-86 establishes that the Study Area is closest to an extremely *outside* bend in the river. Not only is the outside bend huge and wide, it is also directly across the Snohomish River from the mouth of the Pilchuck River as it enters into the Snohomish. This pushes the Snohomish River even more into the outside curve and Marshland’s levee. There is also an obvious buildup of a sandbar on the inside of that curve which also pushes water more forcefully to the outside of the curve on the Marshland side.

The erosion in Marshland’s levee at this point is very severe. Therefore, the Corps of Engineers did a \$554,300 levee rehabilitation project on a 300 linear foot portion of that curve in 2023, \$110,860 of which Marshland had to pay as its 20% share as required under PL 84-99.<sup>20</sup> And SWM was involved in this project because its former hydrologist, Aaron Copp, told his superiors this was an extremely dangerous reach of the river which required levee rehabilitation. Therefore, SWM contributed to Marshland’s 20% cost share under its Flood Damage Reduction Grant Program.

But that is not all. Based on flood stage being reached this past winter, the Corps will undertake another 350 linear foot rehabilitation this summer. Its estimated cost this year is \$1,265,100, making Marshland’s 20% PL 84-99 payment \$253,000.<sup>21</sup> Hopefully, SWM will again make some Flood Damage Reduction Funds available this year, once the project is completed.

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<sup>17</sup> See AFN 201009010214.

<sup>18</sup> See AFN 202204130087.

<sup>19</sup> The only “inside curve” is downstream as the River turns west to flow past Snohomish. But floodwater would have to cross a wide area before it hit the Railroad Dike, which is higher than the 100-year flood, and then overtop the Railroad Dike before it reached the Airfield. Unlikely, to say the least.

<sup>20</sup> See Exhibit 6.

<sup>21</sup> See Exhibit 7.

17

Whether or not that occurs, Marshland had to pay its 20% share of PL 84-99 funds -- \$253,000 -- today, May 22, 2024.<sup>22</sup>

This certainly establishes that the Corps considers the flood threat serious. Therefore, drainage into Hanson Slough is an issue that should have been “assessed” much more seriously than the Airfield’s EA assertion of the “Public Work” exemption, waiving off any significant culverts in its proposed relocation of Airport Way. The Airfield can hardly claim ignorance of this Corps information since the levee being rehabilitated is on property owned by Lance Harvey, one of the Airfield’s owner’s sons who lives across Airport Way from her Airfield and her house. And she, as a Marshland member, is helping pay for these repairs.

And even this is not the end of assessment that could and should have been done. The Corps PL 84-99 program only provides the possibility of rehabilitation if (1) the river hits flood stage, and (2) there is damage to the levee from the flood stage. Since 2019, the Corps has advised Marshland of the River reaching flood stage four times, even though levees were not overtopped.<sup>23</sup>

If there is an overtopping flood anywhere north of Thomas’ Eddy and Baileys, water will find its way to Batt Slough and Hanson Slough. And if (or should we say “when”) there is an overtopping flood across Lance Harvey’s property on the outside curve of the river, water will flow directly to the trestle east of existing 99<sup>th</sup> Avenue/proposed relocated Airport Way. There it will collide with the proposal, perhaps forcefully enough to damage it, but definitely with enough volume to overtop it, and end up in a small Hanson Slough with higher water depth – UNLESS the proposal includes culverts under the proposed relocation and extension. Even then, the amount of time to drain through Hanson Slough’s 18-inch diameter culvert -- water not only from Lance Harvey’s property, but also from Springhetti Road north of the Marshland Flood Canal -- will be substantial; days, if not weeks. In 1990, Hwy 9’s roadbed was so wet from flood water that Snohomish’s Valley View Middle School could not operate for at least three days because school busses (and, of course, all big trucks) were deemed too heavy to use the saturated roadbed. And that bus prohibition continued for another two weeks during which middle school students were bused to Monroe in order to get on Hwy 522 to Maltby and then drive down Broadway to Valley View. These are impacts that went unmentioned and unassessed.

18

### Future Climate Change

On EA Page 3-11 there is a section on “Climate.” Curiously, there is no mention, much less analysis of higher sea levels and future floods as a consequence of climate change. Again, this is a disturbing failure to provide a thorough assessment.

Fortunately, SWM undertook such an assessment in a document SWM indicated was over 290 pages long. Marshland’s copy appears to be 249 pages with another 7-page Appendix A and

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<sup>22</sup> See Exhibit 8.

<sup>23</sup> See Exhibit 9.

1-page Appendix B. This “Snohomish and Stillaguamish River Flood Hazard and Climate Change Vulnerability Assessment” can be examined by using the link below:

<https://snohomishcountywa.gov/DocumentCenter/View/111495/Final-Vulnerability-Assessment-6-28-23> .

Three (3) of the Study’s five (5) fact sheets summarizing the information in the Study are attached as Exhibit 10. The Study contained several conclusions which Marshland will quote below and which are a more accurate indicator of impact to farmlands than the EA’s Appendix F.

Climate change will increase the intensity of flooding through greater volumes of precipitation during extreme weather events and a higher frequency of extreme weather events (Mauger et al. 2015). This will make properties that have been historically safe or infrequently impacted more vulnerable to flood hazards. For example, by the 2080s, a 10% chance annual flood in the lower Snohomish River floodplain could inundate an area 19 to 69% larger than a 10% chance annual flood today (Snohomish Conservation District [SCD] 2019). Page 42.

Intense development in watersheds lacks the natural land cover and ecological functions that allow farmland to accommodate flooding. Page 43.

If the groundwater is too high in spring, farmers may have to delay working the fields until it declines. Sea level rise at the river mouths will slow the outflow of high groundwater levels from the basin, exacerbating the issue. A study performed in the two basins found that these combined impacts could delay the time when farmers can start working their fields up to 3 weeks by the 2050s and 4 to 5 weeks by the 2080s (SCD 2019). Page 46.

When flooding overtops levees in this [Snohomish] reach, the flood waters extend over much of the floodplain, with increases in flood volume ***mostly increasing flood depths*** but not substantially increasing the area affected. Page 72 (Emphasis supplied.)

Most of the houses in the Snohomish River Reach were built before floodplain regulations were established in 1984. As such, there is a relatively high number of houses in the floodplain and some of these houses may not have incorporated flood-resilient design, such as elevated first floors (US Census Bureau 2021; SWM and SLS 2018a). Page 86.

Increases in development in the Snohomish and Skykomish River watersheds could increase the potential for flash flooding as higher levels of runoff will enter the river at increased rates when it rains. While the impacts of small floods can be mitigated by levees in the reach and dams upriver in the Snohomish River watershed, such as Spada Lake Dam, none of these structures are equipped to retain floodwaters for large flood events. Furthermore, levees and channel

18 modifications have constricted the river, which potentially increases flood elevations (SWM and SLS 2018a). The result of these conditions is high streamflows that can rapidly increase in elevation and overtop levees.

With a low lying floodplain spanning 1-2 miles wide, a vast area can be inundated if the levees overtop (SWM and SLS 2018a). While this large area has the benefit of providing extensive land for floodwater storage, much of this land is agriculture and, thus, extended inundation can have direct economic impacts from crop loss. Page 120.

Future flood conditions may increase the general maintenance requirements of the levees, which could increase financial burdens on property owners in the district. Page 121.

Ideally, the SMP [Shoreline Management Program] would disallow or discourage uses that put people and infrastructure in flood-prone areas and/or that disrupt natural floodplain functions. Page 236.

## CONCLUSION

19 Harvey Airfield has been seeking expansion for many years. In the past 10 years it sought both a road relocation and runway extension from 2015-2018. Then in 2022 it switched tactics and sought only a road relocation. It refused to even discuss the runway extension (which is the only reason for a road relocation). Perhaps the strategy was that by adding pedestrian and bicycle lanes, as the present proposal does at EA Pages 1-7, 1-22 and 3-60, the Airport hoped to persuade opponents this would be an aesthetic improvement. But the Snohomish area was not persuaded when addition of such lanes would be short and not connected to Centennial Trail. The County is working to extend Centennial Trail through Marshland and the Trail, not Airport Way, is where pedestrian and bicycle traffic should be directed. The Trail is safer, longer and more accessible.

20 Now in 2024 the Airfield has switched tactics again. It is back to admitting the runway extension is the real goal. In fact, the Airfield may argue that environmental analysis of the relocated road was never the objective of the EA. After all, early in the EA, at Page 1-1 in the second paragraph, it states:

The Airport, in coordination with the FAA, has prepared this Environmental Assessment (EA) to identify and evaluate potential environmental impacts related to the proposed construction and operation of the proposed Runway Improvement Project at the Airport.

There is absolutely no mention of the road relocation in this EA quote. The Airport did not intend to assess the impacts of the road relocation. Rather, the Airport simply claimed it was exempt as a "Public Work" from the density fringe 2%/15% regulations. What the Airport should have done, however, is to have the EA assess the entire proposal. Julie Barrows, in her June 2,

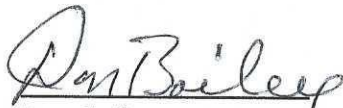
20

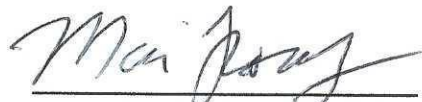
2022 Memorandum to the Airport (for use negotiating with Snohomish County Planning And Development Services (PDS)) wrote about the Airport proposal more correctly. At page 4 she wrote of “these three improvements (runway, taxiways, and roadway)” as “the proposed project in its entirety.”

21

There is no discussion or analysis of prior floods of the 5, 10, 15, 20 and other less than 100- or 500-year floods. There is an incorrect assertion that the Airport is on the inner curve of the River. There is no discussion about Snohomish County SWM and the Army Corps recognizing significant flood damages from overtopping at the Lance Harvey property location on the outside curve of the River. There is no discussion of bird strikes during flood season, rather than the June visit by EA biologists. There is no discussion of improving congested traffic, because the Airport implicitly acknowledges that there will be no improvement since there will be “no change.” There is no discussion of Hanson Slough collecting water through Railroad Trestle and a Springhetti Road outfall draining into Batt Slough through an 18-inch diameter culvert being choked by cottonwood roots. And there is no discussion of the impact of future climate change on rising sea levels creating more frequent floods with increasing flood depths. Because the EA did not and does not assess the proposed project in its entirety, it is not accurate or credible.

**Marshland Flood Control District:**

  
Don Bailey  
Chairperson, Position 1

  
Marv Thomas  
Commissioner, Position 2

  
Tim Stocker  
Commissioner, Position 3

## Response to Commenter A-3

1. The commenter's statements regarding the structure of the Marshland Flood Control District (Marshland) and Harvey Airport's location within it are noted.
2. The commenter's statement regarding the personnel of Marshland and their responsibilities is noted.
3. The EA follows the format and the significance thresholds identified in FAA Order 1050.1F. New Section 1.1.3 in the Final EA discusses the history of flooding in the Study Area and impacts related to flooding are addressed in Section 3.16.2 in the Final EA. Impacts related to biological resources are addressed in Section 3.4 in the Final EA. Impacts related to surface traffic are addressed in Section 3.14.3 in the Final EA. Impacts related to Hanson Slough is discussed in Sections 3.16.1, 3.16.2, and 3.16.3 in the Final EA.
4. The Runway Improvement Project at Harvey Field seeks to enhance the safety of airport users and local citizens by addressing nonstandard conditions at the Airport. Relocating Airport Way would move the road further from the end of the runway, thereby enhancing safety for the road and Airport users alike. Further, and as stated in Section 3.14.3.3 in the Final EA, the relocated road would include dedicated shoulders and bicycle lanes, of which do not occur on the existing Airport Way. Enhancing safety and providing shoulders and bicycle lanes are considered to be public benefits to the public commenters who have asked for shoulders and bicycle lanes.

The Proposed Action does not include a runway extension as described by the commenter; the length of the runway would decrease from its existing 2,672 feet to 2,400 feet. The shifted location of the new runway and the decrease in length are a result of meeting the density fringe requirements of Snohomish County, and to meet FAA safety standards for runways and taxiways.

5. The Proposed Action does not include a runway extension as described by the commenter; the length of the runway would decrease from its existing 2,672 feet to 2,400 feet. Section 1.3.1 in the Final EA discusses the critical aircraft at the Airport, which is Aircraft Design Group II (small) and includes a range of aircraft types within that group beyond the Cessna Caravan. The commenter's statement to have the Airport remain "as is" has been noted but would not meet the Purpose and Need of the Proposed Action, which is to safely and efficiently accommodate current and projected aviation activity at the Airport.
6. The current alignment of Airport Way places it within the Runway Protection Zone (RPZ), which is an incompatible use, and is just 10 feet from the end of Runway 33R. As stated in Sections 1.1.2 and 1.4.2.1 in the Final EA, vehicles traveling on Airport Way are directly under aircraft landing and taking off on the existing runways. Additionally, there are no dedicated shoulders or bicycle lanes on the existing Airport Way. A recent

incident on June 1, 2024, which included an aircraft that overran the end of the runway and collided with a vehicle on Airport Way, highlights the nonstandard condition of the current alignment of Airport Way. The relocation of Airport Way would relocate the road further away from the runway end to minimize the amount of linear feet of roadway within the RPZ, which is considered a public benefit. Additionally, the relocated road would have dedicated shoulders and a bicycle lane. The Proposed Action would not increase the aviation activity at the Airport beyond what is currently forecasted; therefore, there would be no changes in the level of service (LOS) Airport Way currently provides. The purpose of the proposed Airport Way relocation is not to improve LOS, but to provide a greater separation distance between the runway end and the road. Due to the lack of additional vehicle trips being generated with the Proposed Action, as well as the proposal for the relocated Airport Way to tie into the existing intersection of Marsh Road/Springhetti Road, initial coordination with the County was that a traffic study would not be needed. However, the Airport Sponsor will attend a Traffic Pre-submittal Conference with the County during final design, as recommended by the County.

7. The relocation of Airport Way has been deemed a public work project by Snohomish County exempting it from the density fringe regulations (Appendix I in the Final EA provides correspondence with the County to this effect). Roads are an incompatible use in an RPZ, and relocating Airport Way would minimize the amount of linear feet within the RPZ and move the road further away from the runway end. Currently, vehicles travel through the RPZ in close proximity to the runway end (i.e., 10 feet from the runway end) putting them at risk of collision with an aircraft in the case of an overrun. Text has been added to Section 1.1.2 in the Final EA with a brief history of runway incursions at the Airport.
8. Appendix I in the Final EA has been revised to include floodplain modeling for the Proposed Action. Floodplain modeling that was inclusive of airfield and roadway improvements indicates that the FEMA-established BFEs would not increase as a result of the Proposed Action for the regulatory 100-year (one percent-annual-chance) flood event. Additional floodplain modeling will be conducted in final design and the Proposed Action will be required to demonstrate that it does not contribute to a cumulative increase in Base Flood Elevations (BFEs) that exceeds the limits prescribed in the Snohomish County Code 30.65 to obtain the County Flood Hazard Permit.
9. The comment refers to Exhibit 3 in the attachments included with the comments, which shows a concept for Airport Way relocation presented in the 2018 MP effort. Exhibit 3 represents a previous iteration for the relocation of Airport Way prior to this EA. The drawing does not show Airport Way on piles but does include culverts to provide conveyance across the proposed Airport Way.
10. In flooding events greater than the 5-year (20% annual chance) flood event, which would result in levee overtopping, the Harvey Property, including Hanson Slough, becomes one effective storage area designated as Storage Area #9 (see Figure 3-26 in the Final EA). Culverts are proposed along relocated Airport Way along the primary flowpath for

the drainage basin for Hanson Slough (see Figure 3-35 in the Final EA). These proposed culverts would minimize impacts to drainage for runoff and floodwaters. The location, number of culverts, and culvert sizing based will be determined during final design.

11. The terms “100-year” and “500-year” with respect to floodplains are a way of expressing likelihood that a flooding event would occur in a given year. These recurrence intervals are the reciprocals, which is 1% and 0.2% annual chance for a given year, respectively. The 100-year and 500-year events (1% and 0.2% annual chance, respectively) are the regulatory events required by FEMA to be evaluated as of this EA, which is why the Final EA focuses the floodplain discussion on those events. The levees surrounding the Study Area are built to be 1-foot above the 5-year (20% annual chance) flood elevation. In the event of levee overtopping, the entire Airport property would become one effective flood storage area (see Figure 3-26 in the Final EA), which would have an increase in storage volume under the Proposed Action. The Proposed Action has been conceptually shown to cause no adverse action in the regulatory events and the increase in storage suggests that it will likewise have no adverse impact during smaller, non-regulatory events.
12. The commenter’s background information regarding Marshland’s history with drainage issues in the area is noted.
13. Section 3.16.3.3 in the Final EA has been revised to incorporate information provided by the commenter and discuss the culvert connecting Hanson Slough to Batt Slough and its associated tide-gate. Additionally, Section 3.4.3.4 in the Final EA has been revised to identify migratory birds that may be present in the Study Area.
14. See the responses to Comments #8 and #10 of this letter for a discussion of floodplain modeling and proposed drainage infrastructure, respectively. The location, number of culverts, and culvert sizing based will be determined during final design.
15. The commenter’s background information regarding the creation of the Surface Water Management Division is noted.
16. The history of the CDC agreement and establishment of a uniform system of levees on the Snohomish River is noted. Section 1.1.3 has been added to the Final EA to provide an overview of flooding history, levees, and flood control improvements in the Study Area. As the Proposed Action would not modify existing levees, flooding risks associated with levee failure are not evaluated as part of the EA. The 100-year and 500-year flood events (1% and 0.2% annual chance, respectively) are the regulatory events required by FEMA to be evaluated, which is why the EA focuses the floodplains discussion on those events. See response to Comment #11 of this letter regarding levee overtopping during flooding events.

17. See the responses to Comments #8, #10, and #13 of this letter for a discussion of floodplain modeling, proposed drainage infrastructure, and migratory birds, respectively. The commenter's statement indicating that the southern end of the Airport is located on the outside of a localized river meander near the confluence of the Snohomish and Pilchuck rivers is noted. However, the reference sentence is intended to describe directional analysis of levee overtopping during major flooding events; therefore, a more accurate characterization is to state that the Airport generally lies on the inside of a bend of the Snohomish River, which is the dominant flow direction. The two primary directions of flows during levee overtopping are represented in the analysis of the density fringe calculations as shown in Figures 3-29 and 3-30 in the Final EA. Additionally, the commenter's statements regarding the history and condition and improvements to existing levees surrounding the Study Area are noted. However, as the Proposed Action would not modify existing levees, flooding risks associated with levee failure are not evaluated as part of the EA.
18. The commenter's statements regarding sea level rise and the resulting impacts from increased flooding frequency and magnitude in the Study Area and of farming operations are noted. However, current floodproofing measures for existing structures and changes in farming operations as a result of climate change is considered outside the scope of the EA and are not evaluated. Sections 3.16.2.3 and 3.16.2.4 in the Final EA have been revised to include a discussion of climate change and sea level rise based on published sources applicable to the Study Area in accordance with FAA Desk Reference 1050.1F, Section 3.5, Climate Adaptation. FAA Order 1050.1F does not identify sea level rise as an environmental impact category nor provide significance thresholds, or factors to consider in its evaluation. Executive Order 14030, which reinstated the Federal Flood Risk Management Standard (FFRMS), was revoked in early 2025; therefore the standards established in the FFRMS are no longer applicable for the Proposed Action and has been removed from the Final EA.
19. The addition of bicycle lanes to Airport Way was in response to a comment received during the EA scoping period and agreed to by the Airport Sponsor. The bicycle lanes being connected to future trails is beyond the scope of this EA.
20. The Runway Improvement Project is an umbrella term that encompasses all the project components identified in Section 1.5 in the Final EA, including the relocation of Airport Way. The runway would be 2,400 feet in length, which is a decrease of 262 feet. The Final EA analyzes the road relocation as part of the Proposed Action. All elements of the Proposed Action are analyzed in accordance with FAA Order 1050.1F.
21. Section 1.1.3 has been added to the Final EA to provide an overview of flooding history, levees, and flood control improvements in the Study Area. The EA followed the format required by FAA Desk Reference 1050.1F and with guidance from the FAA. Appendix I in the Final EA has been revised to include floodplain modeling for the Proposed Action. Floodplain modeling that was inclusive of airfield and roadway improvements indicates that the FEMA-established BFEs would not increase as a result of the Proposed Action

for the regulatory 100-year (one percent-annual-chance) flood event. Non-regulatory flood events that are less than the FEMA-regulatory 100-year (1-percent-chance) flood event were also analyzed for potential changes in flood elevations based on public comments received on the Draft EA and for informational purposes only. Additional floodplain modeling will be conducted in final design and the Proposed Action will be required to demonstrate that it does not contribute to a cumulative increase in BFEs that exceeds the limits prescribed in the Snohomish County Code 30.65 to obtain the County Flood Hazard Permit. The topics discussed in the comment are addressed in responses to Comments #6, #10, #13, #17, and #18 of this letter for a discussion of RPZs, proposed drainage infrastructure, migratory birds, floodplain hydraulics, and climate resiliency, respectively.



## MEMORANDUM

**TO:** Cynthia Hendrickson, Airport Manager, Harvey Field, Snohomish, WA  
**FROM:** Ryan Barnes PE, Civil Engineer & Owner, RPB Engineering, for Marshland Flood Control District  
**DATE:** 5/24/2024  
**SUBJECT:** Stormwater Review: Harvey Field Runway Improvement Project Draft Environmental Assessment.

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This memorandum and attachment serve as public comment to the Harvey Field Runway Improvement Project's April 12, 2024 Environmental Assessment (draft EA), on behalf of Marshland Flood Control District.

1 The Harvey Field proposed project's purpose is to bring the current runway and taxiway up to current FAA standards and regulations as best as possible, given their operational goals. The overall approach, given that main objective, includes an alternatives analysis screening process in chapter 2 that ends with their preferred alternative or Proposed Action. In chapter 3, the Proposed Action and the No Action Alternative were analyzed in the environmental impact categories as identified in FAA Order 1050.1F. While the document may have been following a specific format, the screening process didn't involve any environmental criteria. Further, the overall organization of the report does not highlight environmental impacts. The nature of a feasibility analysis is to make the case for how feasible a project may be. A draft Environmental Assessment (EA), however, should not do the same. Instead, it should cover all environmental impacts of the Proposed Actions compared to the No Action Alternative. The draft EA reads in certain sections as if it's making a case for the project's feasibility despite the environmental impacts. The draft EA missed an opportunity to be clear, transparent, and thorough in its depiction of environmental impacts, especially when it comes to stormwater.

2 This is highlighted by the draft EA's discussion regarding the Snohomish County Code (SCC) at the beginning of Appendix I. Among the correspondence, they mention they will be submitting for a Shoreline Conditional Use Permit and a Shoreline Variance Permit. Both require approval from the Department of Ecology, but would be first reviewed by Snohomish County. The Shoreline Variance Permit would be *to allow them to fill for reasons other than flood-proofing a structure or as part of an ecological restoration project*. They don't appear to specify that the shoreline variance permit would be for the relocation of Airport Way, of which around 39,500 cubic yards of fill is necessary (according to calculations in Appendix I).

Snohomish County is the agency that either grants or denies a Shoreline Variance Permit for the Proposed Actions. Typically, a shoreline variance permit serves a specific purpose of providing relief from specific bulk, dimensional, or performance standards as set forth in the Snohomish County Shoreline Management Master Program. Permits such as these are granted when the project/property has unique circumstances that would either impose unnecessary hardships on the applicant or thwart the policies in the Shoreline Management Act (SMA). The SMA in Washington aims to provide three major policy objectives:

1. Protect Shoreline resources and the natural environment.
2. Increase public access to publicly-owned shoreline areas.
3. Encourage water-dependent uses.

2 Snohomish County would be the primary regulator for this project, but the Department of Ecology has authority and responsibility to review certain permits for consistency with these three major policy objectives. It is not clear how the project will approach the requirements of the Shoreline Variance Permit. For example, in 2015, the idea was announced that Airport Way’s relocation would be on pilings as to not add fill to Hanson Slough. That is not the case anymore. As the Proposed Actions rely on these two permits being approved, it would be beneficial to include the hardship or circumstance surrounding the current project design that necessitates a Shoreline Variance Permit, and how the project aligns with the SMAs policy objectives.

3 According to SCC 30.65, Density Fringe (DF) requirements are aimed to foster the continued agricultural use of farmland in flood areas and “maintain flood level hazard protection.” Therefore, criteria in SCC 30.65.250 and SCC 30.65.255 is used to prevent a cumulative increase in the base flood elevation (BFE) of more than one foot. Narrative is written in the draft EA to exempt the relocation of Airport Way from the DF requirements because it will be considered a Public Works project. This reasoning is then also used to exempt or omit the relocation of Airport Way with respect to environmental impacts. Instead of strengthening the draft EA’s argument that the relocation of Airport Way will “maintain flood level hazard protection”, this serves to weaken it. See additional comments on the attached. The draft EA missed an opportunity to add transparent and thorough details with respect to how the relocation of Airport Way, as well as all the Proposed Actions, will “maintain flood level hazard protection”.

Additionally, there’s a question of resiliency. The EA states “...during a flood event, floodwater from the Snohomish River would overtop existing levees and be attenuated in the storage area.” (page 3-76) In the Density Fringe area, there is a federal standard for increasing resiliency of infrastructure for flooding events caused by climate disasters. The FFRMS (Federal Flood Risk Management Standard) has three methods to meet this resiliency criteria. The third one is chosen by the project: 500-year floodplain. On page 3-82, the EA makes the case “... the Proposed Action would also be below 500-year floodplain flood elevations, which is being used as the regulatory boundary in accordance with FFRMS. The Proposed Action cannot be elevated out of the 500-year floodplain without violating density fringe floodplain development criteria.” The draft EA uses this as a reason to disband the attempt at a practical alternative. However, another view could be: This is adequate reason the project should not move forward as it does not meet the resiliency criteria.

It is not a question of “if” a flood occurs but “when” a flood occurs which adds weight to the above paragraph. There is little resiliency in its current proposal. As it happens, flooding events will only increase in intensity, duration, and frequency with climate change. The observations of these flooding events as documented by residents near Hanson Slough are significant warnings and deserve recognition in the draft EA narrative. Characterizing the history of severe flooding and the “flooded” conditions (for various storm events), along with a more complete and detailed model and analysis of the Proposed Actions / Hanson Slough area, are warranted. More details are necessary to prove the resiliency of the Proposed Actions.

4 The report also states that “As a result, human safety, health, and welfare would not be affected because of implementation or operation of the Proposed Action as the result of climate change. Therefore, the Proposed Action would meet the floodplain resiliency criteria as outlined in the FFRMS.” (page 3-82) This appears to be a mischaracterization of what it may take to meet floodplain resiliency criteria. Because of the compelling arguments (provided by residents that know the local history) that flooding events bring with them catastrophic losses, the argument would be that human safety, health, and welfare **will be affected** when these flooding events occur. This is a discussion that is missing from the Harvey Field Draft Environmental Assessment.

4 The draft EA should be updated to report on potential impacts in their entirety, with objectivity, for the alternatives discussed. In section 3.16.2.3, considerable discussion is given to the density fringe requirement. It concludes that the roadway relocation is not subject to the allowable density and allowable obstruction requirements. While that may or may not be true, the draft EA uses that to simplify the analysis, beyond what it should be simplified to. For an airport in the flood plain, an environmental analysis should consider the different storm events and flooded state more comprehensively.

5 For this draft EA to be clear, transparent, and thorough, it should have considered hydraulic and hydrologic impacts from the Relocation of Airport Way – see the attached for the list of specific comments. To highlight a few items, the proposal includes the Relocation of Airport Way, which contains nearly 40,000 cubic yards of fill. This is 40,000 cubic yards of water storage replaced with fill. This reduces water storage in Hanson Slough. Period. This is not identified in the draft EA and should be discussed before moving forward. Also, the details of what is happening in the slough and downstream during storm events is missing from the discussion. Two items here. Number one, the downstream flow path (and therefore potential downstream impacts) is not adequately discussed. Specifically, water leaves Hanson Slough via an 18" culvert 1100 feet long that connects to Batt Slough. And then Batt Slough connects to the Snohomish River. Marshland Flood Control District's public comments narrate this with more hydraulic details. Number two, the draft EA does not characterize the storm events (2-, 5-, 10-, 50-, and 100-year storms) with water surface elevations (WSELs) and flows through, in, and around Hanson Slough.

Two additional items to note, before the rest of the specific comments below, which speak for themselves.

6 The draft EA should have included permanent stormwater facilities, even if only preliminary, as this would have been consistent with language provided. Tables summarizing peak discharge rates could have been updated with decreased peak flows, based on H&H modeling of these permanent stormwater facilities. As it is, the "promise" of future stormwater facilities doesn't capture all impacts. For example, project limits may become larger with additional stormwater facilities. These impacts should be documented in the Draft EA.

7 Climate change may increase flood frequency, duration, and depth where the Proposed Actions are located. The description and consideration of flooded conditions or scenarios should be addressed more thoroughly in the draft EA. The impacts of climate change on future flooded scenarios should also be addressed.

Please see attached additional specific comments.

## Response to Commenter A-4

1. The EA followed guidance from the Council on Environmental Quality regulations, FAA Order 1050.1F and FAA Order 5050.4B. Chapter 3 in the EA identifies all of the impacts that would occur as a result of the Proposed Action. These impacts are assessed in comparison to the No Action Alternative.
2. Sections 3.6.4.2 and 3.16.2.4 in the Final EA have been revised to provide additional discussion regarding Shoreline Conditional Use and Shoreline variance permits.
3. Appendix I in the Final EA has been revised to include floodplain modeling for the Proposed Action. Floodplain modeling that was inclusive of airfield and roadway improvements indicates that the FEMA-established BFEs would not increase as a result of the Proposed Action for the regulatory 100-year (one percent-annual-chance) flood event. Additional floodplain modeling will be conducted in final design and the Proposed Action will be required to demonstrate that it does not contribute to a cumulative increase in Base Flood Elevations (BFEs) that exceeds the limits prescribed in the Snohomish County Code 30.65 to obtain the County Flood Hazard Permit. Executive Order 14030, which reinstated the Federal Flood Risk Management Standard (FFRMS), was revoked in early 2025; therefore, the standards established in the FFRMS are no longer applicable for the Proposed Action and have been removed from the Final EA. Section 1.1.3 has been added to the Final EA to provide an overview on flooding history, levees, and flood control improvements in the Study Area.
4. See response to Comment #3 of this letter for discussion of floodplain modeling and applicability of FFRMS. The commenter's statement regarding flooding events is noted. However, losses and impacts to human safety, health, and welfare would not be affected by the Proposed Action. The Proposed Action meets all regulatory floodplain criteria, reduces floodwater displacement (compared to the existing condition), and has been conceptually shown to cause no increase in flood risk for the regulatory 100-year (1-percent-annual-chance) flood event.
5. See the response to Comment #3 of this letter for discussion of floodplain modeling. Existing levees surrounding the Study Area are designed to be 1 foot above the 5-year (20% annual chance) flood event. The existing alignment of Airport Way, which serves as a drainage divide for Harvey Property is lower than this flood elevation. In flooding events greater than the 5-year (20% annual chance) event, the Harvey Property becomes one effective storage area, designated as Storage Area #9 (see Figure 3-26 in the Final EA). Appendix I in the Final EA has been revised to include analysis of change in flood elevations for non-regulatory flood events that are less than the FEMA-regulatory 100-year (1-percent-chance) flood event. Additionally, Sections 3.16.2.3 and 3.17.3.3 in the Final EA have been revised to include a discussion of the culvert connecting Hanson Slough to Batt Slough and its associated tidegate.

6. The EA includes discussion of proposed permanent stormwater facilities, sized based on conceptual hydrology and water quality volumes. Detailed hydrology, hydraulic modeling, and facility siting will be performed during final design, along with final design of the stormwater facilities, which may result in minor variation in the limits of disturbance. However, the impacts would be confined to the Harvey Field property, which is consistent with the Study Area, and would not adversely affect adjacent properties.
7. In accordance with FAA Order 1050.1F, Section 3.5, Climate Adaptation, Sections 3.16.2.3 and 3.16.2.4 in the Final EA has been revised to include a discussion of climate change and sea level rise based on published sources applicable to the Study Area. FAA Order 1050.1F does not identify sea level rise as an environmental impact category nor provide significance thresholds, or factors to consider in its evaluation.

REVIEW COMMENT FORM

DRAFT ENVIRONMENTAL ASSESSMENT, HARVEY FIELD RUNWAY IMPROVEMENT PROJECT, APRIL 2024			
DATE: 5/24/2024			BY RYAN BARNES, RPB ENGINEERING
Comment No.	Page, section, paragraph, table, and/or figure number	Extraction from the draft EA	Response/Comment
1	Chapter 3 Introduction	<p>This chapter provides an overview of potential impacts related to the alternatives discussed in Section 2.5 on each resource category identified in FAA Order 1050.1F, Environmental Impacts: Policies and Procedures (FAA Order 1050.1F). The analysis of each resource category includes the following:</p> <ul style="list-style-type: none"> <li>- Significance Threshold and Conclusion: Significance thresholds or factors to consider for each resource category described in FAA Order 1050.1F, Exhibit 4-1, aid in the analysis provided in this chapter. The analysis of the impacts associated with the Proposed Action is a comparison of the impacts to the No Action Alternative and is based on the information known at the time of this EA's preparation.</li> <li>- Methodology: describes the processes involved in data collection and sources used.</li> <li>- Affected Environment: describes the existing natural, ecological, cultural, social, and economic conditions that could be affected by the Proposed Action.</li> <li>- Environmental Consequences: evaluates the human and environmental consequences of the No Action Alternative and the Proposed Action.</li> <li>- Mitigation Measures: describes mitigation measures related to anticipated impacts.</li> </ul>	<p>The draft Environmental Assessment (EA) has an obligation to report on "potential impacts" in their entirety, with objectivity, for the alternatives discussed. This does not exclude impacts based on an exemption in the code. For example, "environmental consequences" as described herein isn't qualified to mean <i>only under certain circumstances, but as stated: "evaluates the human and environmental consequences of the No Action Alternatives and the Proposed Actions."</i> This sentence states the expectations for each category of Environmental Consequences to follow.</p>
2	Chapter 3, Section 3.4.4.2, p3-10	Water quantity is not expected to substantially change due to the Proposed Action,...	The draft EA does not include an engineering analysis that says this is the case. In comparison, the tables (3-20 and 3-21) that are given in the draft EA show an increase in water quantity in the storms reported. Where's the discussion that says this is considered insignificant?
3	Chapter 3, Section 3.4.4.2, p3-10	...and stormwater facilities would be incorporated to ensure that the Proposed Action does not lead to an increase in peak flows.	The opposite has been shown in the draft EA Appendix I: the report claims it's exempt from flow control. Is it the case that stormwater facilities will be incorporated AND all stormwater flows reported on in this report will NOT increase peak flows in the proposed condition? Or are the impacts as stated in Tables 3-20 and 3-21 the actual results of the proposed conditions?
4	Chapter 3, Section 3.4.4.2, p3-10	...and stormwater facilities would be incorporated to ensure that the Proposed Action does not lead to an increase in peak flows.	In comparison to other parts of the draft EA, this reads like a promise more than what actually has been hydraulically and hydrologically mitigated for in this report. Please be clear and include the discussion that either (1) additional stormwater facilities (not covered in this draft EA) will be added to ensure that this quote is true, or (2) stormwater facilities as provided do not lead to an increase in peak flows. If the latter is true, please reconcile with the results in tables 3.20 and 3.21 and in appendix I.

**REVIEW COMMENT FORM**

<b>DATE: 5/24/2024</b>			<b>BY RYAN BARNES, RPB ENGINEERING</b>
5	Chapter 3, Section 3.4.4.2, p3-10	These impacts would be minimized using existing infiltration trenches and a bioswale as well as the construction of new stormwater facilities that would be installed to provide additional capacity to treat stormwater runoff from PGIS using technology to remove sediments and associated pollutants.62	What new stormwater facilities will be added? Please add to draft EA.
6	Chapter 3, Section 3.4.4.2, p3-10	Under Section 7 of the ESA, on November 9, 2023, the FAA initiated consultation with the USFWS and NMFS. The results of the consultation will be updated in the Final EA.	Why aren't the results of the consultation available in the draft EA? Possibly should have Included in the draft EA so that the public has a chance to review and comment on.
7	Chapter 3, Section 3.4.4.2, p3-10	Under Section 7 of the ESA, on November 9, 2023, the FAA initiated consultation with the USFWS and NMFS. The results of the consultation will be updated in the Final EA.	What are the results of the consultation with the USFWS and NMFS?
8	Chapter 3, Section 3.4.5, p3-10	The following conservation measures and facilities would be employed during construction of the Proposed Action that would minimize and mitigate for impacts to wildlife habitat and species and aquatic habitat and species: ...	There is no mention of stormwater changes, flooding, or downstream impacts.
9	Chapter 3, Section 3.4.5, p3-11	Impacts to Wetland A will be mitigated to compensate for all unavoidable wetland impacts.	Where? How? Cite and include this discussion.
10	Section 3.5 Climate	-	Although not the focus of this section, the following is missing from the EA: What's missing from a climate change perspective is the discussion on the latest science of climate change possibly increasing frequency and duration of larger stormwater events. And how that science is affecting policy in the direction of more/larger mitigation not less. And How does that relate to what's been proposed for this project?
11	Section 3.6.1, p3-13,3-14	...the FAA has identified factors to consider when evaluating the context and intensity of potential environmental impacts on coastal resources...	The draft EA has an opportunity in this section (and related sections) to discuss the potential impacts of the project into the Hanson Slough. A slough is a swamp or shallow lake system, typically found as a backwater to a larger body of water. The Hanson Slough may be a part of the estuarine environment as it serves as a backwater to Snohomish River. The Coastal Zone Management Act (CZMA) aims to protect shoreline resources and the natural environment and one purpose is to prevent uncoordinated or piecemeal development of the state's shoreline. adding fill to Hanson Slough without full and complete analysis of, for example, the 18" culvert 1100 feet long into Batt Slough, may be considered piecemeal. Please consider the potential environmental impacts on coastal resources with respect to these details.
12	Section 3.6.1, p3-13,3-14	Factors to consider that may be applicable to coastal resources include, but are not limited to, situations in which the proposed action or alternative(s) would have the potential to: -Cause adverse impacts to the coastal environment that cannot be satisfactorily mitigated.	this is an area that deserves more attention than it has been given in the draft EA. "satisfactorily mitigated" can't be determined until more engineering analysis is provided with regard to flood impact changes with the Proposed Actions. The draft EA could be more specific with how it's satisfactory mitigating the adverse impacts from the Proposed Actions.

**REVIEW COMMENT FORM**

DATE: 5/24/2024			BY RYAN BARNES, RPB ENGINEERING
13	Section 3.6.4.2, p3-16	Construction of the Proposed Action would implement stormwater facilities used to minimize stormwater runoff, including measures such as using silt fencing or other barriers.	These are temporary erosion control measures, not permanent. More explanation would be needed here to either (1) explain why only temporary measures are necessary, or (2) add information with regard to permanent stormwater facilities or (3) rewrite the sentence and section to describe all temporary and permanent measures being taken. If the Proposed Actions are not implementing new permanent stormwater facilities other than Post-Construction Soil Quality and Depth, and Concentrated Flow Dispersion or Sheet Flow Dispersion, then state that.
14	Section 3.6.4.2, p3-16	The portion of the Proposed Action with a Resource Shoreline Environment designation includes a road relocation, which is considered to be a permitted land use.	This sentence appears to relate to the part of the Proposed Action which is outside the UGA and thus this sentence should be clarified as such.
15	Section 3.6.5.	The Airport Sponsor would obtain a Shoreline Conditional Use Permit from Snohomish County and a Shoreline Variance Permit from the County with final DOE approval. With these two permits, the Proposed Action would be consistent with the County SMP.	Snohomish County determines what would be consistent with the County SMP and SCC. The Proposed Actions rely on these two permits being approved. A transparent discussion of the details regarding the Proposed Actions deviations from what is normally a variance from fill being placed in the floodplain for floodproofing / ecological restoration would be in order. That discussion does not appear to be here. Please expand this section to include the details of these mitigation measures.
16	Figure 3-2, 3-3, 3-7, 3-8, 3-9, 3-10, 3-11, 3-25, 3-26, 3-28		Please update these figures, and others like it, with the project limits / extensive outline of the Proposed Actions including the relocation of Airport Way.
17	Section 3.16, p3-68	According to FAA Order 1050.1F, water resources include wetlands, floodplains, surface waters, groundwater, and wild and scenic rivers. As Section 3.2.1 describes, there are no wild and scenic rivers in or close to the Study Area; therefore, this section does not discuss that resource category.	Does Snohomish River not count and why?
18	Section 3.16.1.4, p3-70	The Proposed Action would result in temporary and permanent impacts to Wetland A and no impacts to Wetland B, Wetland D, or off-site Wetland C.146 To avoid impacts to Wetland D and minimize impacts to Wetland A, the alignment of Airport Way was adjusted during preliminary design while still meeting County design standards for roads. Based on preliminary design, construction of the relocated Airport Way would result in approximately 0.12-acre of permanent impacts to Wetland A and 0.17-acre of temporary impacts to Wetland A (Figure 3-24). These impacts would be minor because they only affect a small portion of the wetland.	Are impacts qualified solely by area impacted? What about airport way dividing Wetland A -does that impact the wetland function in addition to the land disturbed?

**REVIEW COMMENT FORM**

DATE: 5/24/2024			BY RYAN BARNES, RPB ENGINEERING
19	Section 3.16.2.3, p3-76	The Study Area is also located in a flood storage area surrounded by existing levees. 151 As a result, during a flood event, floodwater from the Snohomish River would overtop existing levees and be attenuated in the storage area. Floodwater would then discharge either to the west under the overpass for State Route 9 (Woodinville Snohomish Road) or to east under an existing railroad overpass.152 See Figure 3-26 for location of flood storage areas and floodwater discharge locations for the Study Area.	Because the project is located in a flood storage area, the conditions of the existing topography and the proposed topography in various flooded states should be required for this section. Neither figures nor narrative describe various flooded states. The part "...during a flood event, floodwater from the Snohomish River would overtop existing levees and be attenuated in the storage area." is not adequate narrative to describe the impacts (negative or positive) this project will have on surrounding areas specifically Hanson Slough and immediate adjacent land. Given the seriousness of the flood events that have occurred in this area over the past 35 years, more thorough detail is necessary to document environmental consequences in terms of flooding, which the draft EA is dedicated to providing.
20	Section 3.16.2.3, p3-76 and Figures 3-25, 3-26	The Study Area is also located in a flood storage area surrounded by existing levees. 151 As a result, during a flood event, floodwater from the Snohomish River would overtop existing levees and be attenuated in the storage area. Floodwater would then discharge either to the west under the overpass for State Route 9 (Woodinville Snohomish Road) or to east under an existing railroad overpass.152 See Figure 3-26 for location of flood storage areas and floodwater discharge locations for the Study Area.	It's not clear from the narration given and Figure 3-25 and 3-26, why the scale of the figure is such a large area, especially given that the discharge from Storage Area #9 is, as I understand it, to the east and to the west. A more refined analysis with accompanying additional figures of what occurs in Storage area #9 seems appropriate information to include.
21	Section 3.16.2.3, p3-76	The Study Area is also located in a flood storage area surrounded by existing levees. 151 As a result, during a flood event, floodwater from the Snohomish River would overtop existing levees and be attenuated in the storage area. Floodwater would then discharge either to the west under the overpass for State Route 9 (Woodinville Snohomish Road) or to east under an existing railroad overpass.152 See Figure 3-26 for location of flood storage areas and floodwater discharge locations for the Study Area.	Hydraulically where is the water flowing during this "attenuation"? Do different storm events produce similar hydraulic movement over the land and can you characterize this? Does one storm event over others produce more damage? Is there an increase in flooding that may occur as a result of the project and why? Is there a decrease in flooding that may occur as a result of the project and why? Rather than an increase/decrease in the chance of flooding as a result of this project, is there a change of hydraulic flow (from this project) that may result in more/less damage?
22	Figures 3-25, 3-26	-	Include project limits / extent of Proposed Actions.
23	p3-76	Federal Flood Risk Management Standard (FFRMS) section	It's unclear why this section is located here and how this project is meeting this resiliency criteria.
24	p3-78	Snohomish County Density Fringe Floodplain section	It's unclear why this section is located here and how the Proposed Actions meeting the criteria for Maximum Allowable Density and Maximum Allowable Obstruction determines the "Affected Environment" (section heading)?
25	p3-78	Additionally, the cumulative increase in the BFE from the maximum allowable density and obstruction limitations shall not be more than one foot.15	Where has this been demonstrated? Simply stating this doesn't mean it's true.
26	p3-78	Maximum allowable density and obstruction limitations do not apply to Public Works projects that demonstrate that the maximum cumulative floodwater displacement allowed per SCC 30.65 do not cause a cumulative increase in the BFE of more than one foot.159	Does this project demonstrate this? Please make more clear in this draft EA that the Public Works project does not cause a cumulative increase in the BFE of more than one foot.

**REVIEW COMMENT FORM**

DATE: 5/24/2024			BY RYAN BARNES, RPB ENGINEERING
27	Section 3.16.2.4, p3-81	The relocated Airport Way is a Public Works project as defined by SCC166, 167 as the Airport Sponsor would dedicate the proposed right-of-way to Snohomish County Public Works upon construction completion.168	This is stated under the Environmental Consequences section which is confusing because it has nothing to do with environmental consequences, other than, perhaps, as a reason for the Proposed Actions involving the Airport Way relocation are not included in detail in the section. Therefore, this sentence is reason enough that the Environmental consequences, as detailed in this section, of the Proposed Actions are incomplete and in need of additional information/analysis.
28	Section 3.16.2.4, p3-81	The Proposed Action, as defined in Section 1.5, is consistent with the preferred development identified in the 2018 MP for determination of density fringe requirements.	References to the 2018 MP, here, in this section, and elsewhere in the draft EA are not explanatory statements. The reader of the draft EA does not know what the "preferred development" is and what was (and was not) covered in the 2018 MP. Either relevant documents should have been included from the 2018 MP in an appendix or more information should have been given where ever the 2018 MP is referenced so that there's no question of impacts. As it is, there are questions regarding environmental impacts, and referencing another document not included in the draft EA does not impress upon the reader that the section is whole and complete.
29	Section 3.16.2.4, p3-81	Similar to the 2018 MP preferred development, the Proposed Action would include three sets of 20-foot span box culverts would be constructed on the southern end of proposed Runway 15/33.	Please include the equivalent information for the relocation of airport way. How many culverts? What size? Where are they located?
30	Section 3.16.2.4, p3-81	Similar to the 2018 MP preferred development, the Proposed Action would include three sets of 20-foot span box culverts would be constructed on the southern end of proposed Runway 15/33.	Did the 2018 MP analyze the proposed relocation of airport way? Was Hanson Slough modeled with detail in 2018?
31	Section 3.16.2.4, p3-81	These box culverts would allow for the passage of floodwater in a flood event and minimize the amount of fill required, thereby allowing for the Proposed Action to meet density fringe floodplain maximum obstruction requirements.	What about the passage of floodwater in a flood event under Airport Way?
32	Section 3.16.2.4, p3-81	During the development of the 2018 MP, this approach to meeting density fringe floodplain criteria was presented to stakeholders including Snohomish County and was approved.	Because an approach was approved, this does not negate the full and complete and objective analysis of the environmental consequence of all the Proposed Actions.
33	Section 3.16.2.4, p3-82	The Proposed Action cannot be elevated out of the 500-year floodplain without violating density fringe floodplain development criteria.	This sentence appears to confirm that the Proposed Actions cannot meet resiliency requirements of the FFRMS.
34	Section 3.16.2.4, p3-82	The Proposed Action cannot be elevated out of the 500-year floodplain without violating density fringe floodplain development criteria.	if meeting resiliency criteria is at odds with the density fringe floodplain critiera, then should the project be implemented?
35	Section 3.16.2.4, p3-82	As a result, human safety, health, and welfare would not be affected because of implementation or operation of the Proposed Action as the result of climate change.	There has been no mention of climate change in 3.16 until now and therefore it's not appropriate to make this claim. Climate change with regard to flooding in the floodplains deserves a complete discussion, and not just a conclusion as this sentence states. Please include a thorough analysis of how flooding may increase in this region as a result of climate change.

**REVIEW COMMENT FORM**

DATE: 5/24/2024			BY RYAN BARNES, RPB ENGINEERING
36	Section 3.16.2.4, p3-82	Therefore, the Proposed Action would meet the floodplain resiliency criteria as outlined in the FFRMS	This is in direct contrast to the resiliency criteria chosen by the project and comment 33 above.
37	Section 3.16.2.4, p3-82	Operational Impacts – Snohomish County Density Fringe Floodplain Density fringe floodplain analysis only considers airfield improvements of Proposed Action as the relocation of Airport Way is considered exempt.172, 173	An exemption in the density fringe maximum allowable density and obstruction limitations is not equivalent to an exemption in floodplain or environmental impact analysis. The relocation of Airport Way is not exempt from floodplain analysis, and is wrongly omitted from this section.
38	Section 3.16.2.4, p3-82	Operational Impacts – Snohomish County Density Fringe Floodplain Density fringe floodplain analysis only considers airfield improvements of Proposed Action as the relocation of Airport Way is considered exempt.172, 173	An exemption for density fringe floodplain analysis is allowed for public works when "the project proponent demonstrates" that the floodwater displacement shall not cause a cumulative increase of 1 foot in the BFE. This draft EA has not demonstrated this.
39	Section 3.16.2.4, p3-82	Operational Impacts – Snohomish County Density Fringe Floodplain Density fringe floodplain analysis only considers airfield improvements of Proposed Action as the relocation of Airport Way is considered exempt.172, 173	An analysis that exempts or removes part of the Proposed Actions that impacts a slough is missing an important discussion on the environmental impacts of the proposed actions on the floodplains.
40	Section 3.16.2.4, p3-84	The Proposed Action would result in a net decrease in earthwork relative to the 2018 MP preferred development alternative.	Does the 2018 MP preferred development alternative include the Relocation of Airport Way?
41	Section 3.16.2.4, p3-84	Therefore, the hydraulic modeling performed for the 2018 MP serves as an accurate and conservative representation of floodplain impacts.	Was the Relocation of Airport Way included in the hydraulic modeling?
42	Section 3.16.2.4, p3-84	As the Proposed Action is consistent with the 2018 MP preferred development, this hydraulic modeling demonstrates that the Proposed Action would not result in adverse flooding impacts to adjacent properties or Marshland FCD infrastructure.	Clarifying language should be included as to whether the hydraulic modeling included the Relocation of Airport Way. In addition: Was the hydraulic modeling conducted for different storm events? Was hydraulic modeling conducted with various levels of inundation? How far downstream in Marshland FCD were "flooding impacts" analyzed? Did the modeling specifically detail Hanson Slough? After a discussion that includes answers to questions such as these, providing a written representation of the hydraulic modeling, only then can a concluding sentence such as this be written.
43	Section 3.16.2.4, p3-84	Operational Impacts – Marshland Flood Control District (FCD) As described in Section 3.16.2.3, the Study Area lies within the Marshland FCD. The Proposed Action would implement on-site storage to detain stormwater runoff and reduce peak flowrates from the Study Area to a level equal to or less than the peak flow rates in the existing condition. This represents a nominal reduction in flood risk to the Marshland FCD.	The Proposed Action has not described on-site storage to detain stormwater runoff in the section or draft EA - this is not true or if true has not been adequately discussed. (Proposed Action has 14 bulleted items on p1-20 as part of its scope and not one is on-site storage to detain stormwater.) Appendix I states the project is exempt from flow control. Tables 3-20 and 3-21 show an increase in peak discharge not an decrease. Fix this discrepancy.
44	Section 3.16.2.4, p3-84	Operational Impacts – Marshland Flood Control District (FCD) As described in Section 3.16.2.3, the Study Area lies within the Marshland FCD. The Proposed Action would implement on-site storage to detain stormwater runoff and reduce peak flowrates from the Study Area to a level equal to or less than the peak flow rates in the existing condition. This represents a nominal reduction in flood risk to the Marshland FCD.	as written the Proposed Action includes 14 bulleted items from p1-20 including the Relocation of Airport Way, but, as I understand it, you've exempted that part of the Proposed Actions based on its exemption from Density Fringe density and obstruction limitations (DF). The exemption from DF does not mean an exemption of floodplain analysis. if the proposed actions as stated herein doesn't include the relocation of airport way, the analysis is incomplete. If the project as stated here doesn't include the Airport Way relocation, then that equivalent level of analysis is missing and needs to be provided and findings made available to the public

**REVIEW COMMENT FORM**

DATE: 5/24/2024			BY RYAN BARNES, RPB ENGINEERING
45	Section 3.16.3, p3-87	3.16.3 Surface Waters The CWA establishes the basic structure for regulating the discharge of pollutants into waters of the United States. Section 402 of the CWA establishes the NPDES permit program.	What's missing is an analysis of impacts of environmental pollutants washing into waters and farmland after 100-year flood events and larger. Semi-frequent flooding would carry environmental pollutants and may potentially harm farmland. This project increases impervious surfaces, and in these events, pollutants would be washed with the flood waters.
46	Section 3.16.3.3, p3-88	Airport Way serves as the divide between these two drainage basins.	With changes proposed, would it still be the divider between basins? How? Please describe.
47	Section 3.16.3.3, p3-88	Stormwater runoff from the South Basin generally sheet flows off paved roads and into Hanson Slough. Runoff is then discharged off-site to the east under a railroad overpass where it ultimately discharges to the Snohomish River to the east (see Figure 3-32).	Downstream conveyance should be narrated with more detail, including how stormwater flows through Hanson Slough, and the conveyance into and through the 1100 foot long culvert to Batt Slough, and conveyance through the slough and tidal gate to Snohomish River. Additionally, Hanson Slough won't empty if certain downstream conditions are met, such as high water elevation in Snohomish River, which prevents flow through the tidal gate. These details are crucial to characterizing downstream impacts associated with stormwater flow from the Proposed Actions and identifying and designing preventative measures to those impacts.
48	Section 3.16.3.3, p3-88	These permanent water quality facilities do not provide attenuation for stormwater runoff during larger storm events.	Noted. Water quality facilities are not flow control facilities which this draft EA states will be used, though there is no mention of the details of the onsite storage to detain stormwater, nor does Appendix I or tables 3-20 and 3021 support this.
49	p3-96	Operational Impacts – Hydrology and Hydraulics Implementing the Proposed Action would alter the hydrology and impervious cover in drainage basins covering the Study Area.	Noted.
50	p3-97	Culverts are proposed underneath proposed embankments associated with proposed Runway 15/33 and Airport Way (Figure 3-35). These culverts would ensure continuity of existing drainage directions and that flow is not obstructed.	Noted, however draft EA shouldn't claim culverts underneath Airport Way would not obstruct flow without including that analysis herein.
51	p3-97	Culverts are proposed underneath proposed embankments associated with proposed Runway 15/33 and Airport Way (Figure 3-35). These culverts would ensure continuity of existing drainage directions and that flow is not obstructed.	It was observed culverts are included in Airport Way in Figure 3-35. Is this the location, quantity, and design that ensures continuity of existing drainage directions and flow is not obstructed?
52	p3-97	As discussed in Section 3.16.2.4, the use of culverts to preserve existing flow patterns and minimize impacts to the floodplain was reviewed by Snohomish County as part of the 2018 MP.	Was this reviewed for Relocation of Airport Way? As far as what was discussed in 3.16.2.4, it does not cover culverts in Airport Way.
53	Tables 3-20, 3-21	-	These tables should include the 100 year peak discharge rate.
54	Tables 3-20, 3-21	-	Values in tables show, albeit small, there is an increase in stormwater peak discharge rate for the Proposed Actions for every storm. This is in direct contrast to a few places in the draft EA that assured the reader they would implement onsite storage to reduce peak flow rate to "a level equal to or less than the peak flow rates in the existing condition." There is a disconnect between these tables and the narrative that should be reconciled.
55	Section 3.16.3.4	-	What is the water surface elevation (WSEL) for the 2-year, 5-year, 10-year, 50-year, and 100-year storm events in and around the Proposed Actions and Hanson Slough? Is there flooding in Hanson Slough for these storm events? What does this look like in both existing conditions and proposed conditions?

**REVIEW COMMENT FORM**

DATE: 5/24/2024			BY RYAN BARNES, RPB ENGINEERING
56	p3-100	In the existing condition, only a portion of the stormwater runoff generated from Airport Property discharges to permanent water quality facilities with a portion of runoff discharging off-site untreated. However, the SCDM only requires that water quality treatment be provided for areas disturbed by new development.204 Therefore, proposed permanent water quality facilities would only treat areas that are disturbed as part of the Proposed Action as well as contributing areas for permanent water quality facilities that are demolished as part of the Proposed Action.	Please clarify that all disturbed areas of the project/Proposed Actions will maintain facilities to treat stormwater runoff.
57	Section 3.16.3.5, p3-101	Therefore, no significant impact would occur under the Proposed Action and no mitigation measures are required or proposed.	There was no discussion around pollutant contaminated water as a result of a flooding event, being washed elsewhere in the floodplains, which may result in environmental degradation of surface waters and farmland over time. Due to the well documented flooding occurring in the floodplains, this would be a worthwhile discussion to include in the EA.
58	Section 3.16.4.3, p3-102	The Study Area is in an area with high aquifer sensitivity due to low depth to groundwater (see Figure 3-37). 212	How does the semi-frequent occurrence of flooding in the area, with all the pollutants this flooding bring, impact the groundwater?
59	p3-107	...the Airport Sponsor would obtain an ISGP219 which typically provides non-structural control measures to prevent potential pollutant transport via stormwater runoff, including development of a SWPPP and Spill Prevention Control and Countermeasure (SPCC) plan.220	Noted. As a matter of cost savings and other factors to consider, occasionally structural control measures are installed to help meet the requirements of the IGSP.
60	Section 3.16.5.2, p3-108	The Proposed Action would encroach on FEMA-designated density fringe floodplain and cannot be raised above established BFEs due to local density fringe floodplain requirements. As no permanent structures for human habitation would be implemented under the Proposed Action as defined in Section 1.5, the Proposed Action would meet the requirements for floodplain resiliency under the FFRMS.	While it is understood that all precautions are being taken, the conclusion that the Proposed Actions meet resiliency criteria seems at odds with other language in draft EA (see comment 33).
61	Section 3.16.5.2, p3-108	From modeling conducted for the 2018 MP preferred development alternative, which is consistent with the Proposed Action, proposed development would not result in an increase in the BFE for the 100-year (one percent-annual-chance) flood event.	Did this 2018 modeling include the relocation of Airport Way? What was the scale at which the model was conducted, i.e. was it the three storage areas in Figure 3-26? Or did it involve all nine storage areas? Would an updated model that was limited to the discharge locations identified in this draft EA show the same results? How about another model that is "in-between"? The answers to these question would be important to the full documentation of environmental consequences during a flooding event.
62	Section 3.16.5.3, p3-109	Drainage boundaries and stormwater outfalls would remain unchanged as the result of the Proposed Action.	Drainage boundaries would not remain the same: As the current Airport Way delineates the north basin from the south basin, it would seem the relocation of Airport Way would affect drainage basins.
63	Section 3.16.5.3, p3-109	Proposed conditions peak flow rates would be less than or equal to existing conditions flow rates to minimize adverse effects to downstream infrastructure and aquatic life.	This is contrary to the results given in Tables 3-20 and 3-21 and Appendix I. Is there more mitigation that is planned to reduce peak flow rates that is not yet included in the draft EA?
64	Section 3.16.5.3, p3-109	Therefore, the Proposed Action would result in no significant impact on surface waters.	This cannot be stated until more information is included in the draft EA in accordance with this full list of comments.

**REVIEW COMMENT FORM**

<b>DATE: 5/24/2024</b>			<b>BY RYAN BARNES, RPB ENGINEERING</b>
65	Section 3.17.4	Wild and Scenic Rivers is not reflected in Table 3-24 because wild and scenic rivers are not present in the study area and, therefore, cannot contribute to a cumulative effect.	Why isn't Snohomish River considered a Wild and Scenic River?
66	Table 3-24 "Biological Resources"	The FAA consulted with USFWS and NMFS and the result of the consultation will be updated in the Final EA.	This information should have been provided in the draft EA and subject to public comment. USFWS and NMFS response to the Proposed Actions should be made public during this process.
67	Table 3-24 "Water Resources"	Floodplains: The entirety of the Airport is in the density fringe Floodplain, which allows development with restrictions on maximum density, maximum floodwater obstruction, and changes in BFE.	Please add into the discussion the seeking of a Shoreline Conditional Use Permit and a Shoreline Variance Permit.
68	Table 3-24 "Water Resources"	Proposed Runway 15/33 meets the above requirements. Floodplain hydraulic modeling conducted in the 2018 MP with a design consistent with the Proposed Action demonstrated a change in BFE of 0.00 feet because of the Proposed Action.	Does the Floodplain hydraulic modeling include the Airport Way relocation? What does "a change in BFE of 0.00 feet" mean for Hanson Slough and adjacent areas? Please update the draft EA with hydraulic analysis that directly discusses what's going on in Hanson Slough and adjacent and downstream areas. Additionally, How does climate change increase the chance of more frequent and larger storms?
69	Appendix I, page 4	Drainage basin boundaries and outfalls will remain unchanged in proposed conditions. Proposed changes in hydrologic conditions and stormwater system under the Proposed Action can be seen in Figure 2.	Current airport way delineates north basin from south basin. Moving Airport way creates/modifies these drainage boundaries. More discussion is necessary to explain this position: Do the Proposed Actions actually include removal of the impervious area on current Airport Way and maintenance of the elevation? If so, then this is not documented as part of the Proposed Actions on page 1-20 and should be. Additionally what precautions would be taken to maintain this delineation? This would be in the draft EA's interests as this could become a critical breach of assumptions of the draft EA if the embankment doesn't hold.
70	Appendix I, page 4	Drainage basin boundaries and outfalls will remain unchanged in proposed conditions. Proposed changes in hydrologic conditions and stormwater system under the Proposed Action can be seen in Figure 2.	Current airport way delineates north basin from south basin. Moving Airport way creates/modifies these drainage boundaries. More discussion is necessary to explain this position: Do the Proposed Actions include removal of the impervious area on current Airport Way and maintenance of the elevation on the current divider? Would elevation increase or decrease? What will happen at this delineation between north and south basins is not detailed in the draft EA and should be. Further, the relocated airport way divides the Hanson Slough - this should not be characterized as "remain unchanged" as this is a real impact that should be documented.
71	Appendix I, Section 2.2.1, page 7	For the purposes of this analysis, the focus will be on MRs 3 through 8 as they impact the proposed stormwater improvements. The following sections briefly describe these requirements and their applicability to this project.	Addressing MR #1 and the BMPs used in the developed condition even if it's preliminary is necessary to determine impacts. For example, the project limits / extent of fill as shown in this document may increase due to allocating area to new BMPs used to treat stormwater in the developed condition.
72	Appendix I, Section 2.2.1.1, page 7	(entire section)	This section isn't addressing the water pollution source control used in the developed condition following construction. Minimum Requirement #3 is not met.

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DATE: 5/24/2024		BY RYAN BARNES, RPB ENGINEERING	
73	Appendix I, Section 2.2.1.2, page 8	The Proposed Action would not modify drainage boundaries nor existing stormwater outfalls.	This has not been shown in the EA. See comments 69 and 70. For example, current delineated area between south and north basin would no longer have Airport Way - what's to prevent stormwater and floodwaters from crossing from one basin to the other? Either the natural drainage system has been changed or the details of how the Proposed Actions would maintain these boundaries has not been shared. More information should be included to clear up this confusion.
74	Appendix I, Section 2.2.1.2, page 8	Additionally, proposed conditions peak flow rates at stormwater outfalls would not exceed those of existing conditions which would minimize off-site drainage impacts. As a result, the Proposed Action would meet the requirements of MR 4.	This conflicts with other information: In tables 3-20 and 3-21 peak discharge flow rates have been shown to increase in proposed conditions. Off-site drainage impacts have not been minimized. MR #4 has not been addressed completely.
75	Appendix I, Section 2.2.1.3, page 8	(whole section)	The Proposed Actions are both within the UGA and outside the UGA. Table 1.1 in SCDM 2.5.5 applies. Please consider updating the section according to full requirements of MR #5. As written, MR #5 is not met.
76	Appendix I, Section 2.2.1.3, page 8	(whole section)	All minimum requirements apply to the new hard surfaces and the converted vegetation areas in the project, because the Proposed Actions add more than 5000 sf of new hard surface. The local government may allow the MR to be met for an equivalent area, but (1) MR #5 still applies and (2) this needs to be explained/discussed herein. Ecology even says "if the redevelopment project scope is sufficiently large the cost or space thresholds identified above are exceeded, it is reasonable to require the replaced surfaces to be brought up to current stormwater standards."
77	Appendix I, Section 2.2.1.3, page 8	Additionally, projects that are exempt from MR 7 do not have to achieve the LID performance standards, nor consider bioretention, rain gardens, permeable pavement, and full dispersion.	No. Exemption is only allowed if also using List #1 or List #2, with additional consideration of other BMPs if feasible. The draft EA make no mention of List #1 or #2. Include a discussion of BMPs considered from List #1 or #2 in accordance with SCDM and these comments. Here is the quote from SCDM 2.5.5: "Projects that are exempt from Minimum Requirement 7 as set forth in Section 2.5.7 of this chapter do not have to achieve the LID performance standard, nor consider bioretention, rain gardens, permeable pavement, and full dispersion <b>if using List #1 or List #2.</b> However, those <b>projects must implement the following BMPs if feasible:</b> <ul style="list-style-type: none"> <li>• BMP T5.13 Post-Construction Soil Quality and Depth; and</li> <li>• BMP T5.10A Downspout Full Infiltration Systems, BMP T5.10B Downspout Dispersion Systems, or BMP T5.10C Perforated Stub-out Connections; and</li> <li>• BMP T5.11 Concentrated Flow Dispersion or BMP T5.12 Sheet Flow Dispersion." (emphasis added)</li> </ul>
78	Appendix I, Section 2.2.1.3, page 8	RS&H determined that the Proposed Action is exempt from MR 7, thus the facilities listed above would be considered for the site.	This does not explain how the Proposed Actions are exempt from 30.63A.210. How was this determination made by RS&H?

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DATE: 5/24/2024			BY RYAN BARNES, RPB ENGINEERING
79	Appendix I, Section 2.2.1.3, page 8	RS&H determined that the Proposed Action is exempt from MR 7, thus the facilities listed above would be considered for the site.	Clarification of the latter half of sentence is requested. There are no facilities listed above. What are the "facilities listed above"? Why are those facilities the only ones considered, whatever they may be? Please include.
80	Appendix I, Section 2.2.1.4, page 9	The Proposed Action would meet both criteria, so stormwater runoff from disturbed areas would be treated by future permanent stormwater facilities.	Noted. More information should be included as to these future permanent stormwater facilities. It only serves to make the draft EA more thorough by including more information about planned facilities.
81	Appendix I, Section 2.2.1.4, page 9	SCDM Volume V, Chapter 4, Section 4.1 provides requirements for design storm volumes and flow rates.	Consider rephrasing the sentence to be more specific as the Proposed Actions do not include meeting the requirement for flow control but for water quality. The Proposed Actions do not meet design storm volumes and flow rates for MR #7 Flow Control.
82	Appendix I, Section 2.2.2, page 10	To minimize impacts to downstream properties and drainage infrastructure owned by the Marshland FCD, the stormwater improvements Proposed Action will ensure that peak flow rates from proposed conditions are less than or equal to those in existing conditions, regardless of the applicability of Snohomish County flow control requirements.	As mentioned elsewhere in these comments, more analysis, discussions, and updated tables (3-20, 3-21) are necessary to corroborate "that peak flow rates from proposed conditions are less than or equal to those in existing conditions,..."
83	Appendix I, Section 2.3.5, page 14	Without permanent stormwater facilities for attenuation, the Proposed Action would increase stormwater runoff in both Airport drainage basins across each design storm analyzed. Table 6 and Table 7 below present the peak discharges and increases in peak discharge across each basin for the three design storms analyzed.	It appears that permanent stormwater facilities are needed to meet MR#5
84	Appendix I, Section 2.3.6 (whole section)		This section appears to be a stopgap measure for what should have been the case from the beginning of the draft EA: Incorporation of permanent stormwater facilities now, in the draft EA , to actually deliver on the "promise" of what the draft EA states throughout, would have been a more complete approach. That way, there would've been tables that agree with the narrative, where the narrative/discussion is included and not missing, and that would have been a more thorough discussion of impacts. For example, additional stormwater facilities may increase the footprint of the project, and that could have been reported on. Instead there is quite a bit riding on "Future Design Considerations" and any "future" impacts of those design considerations have not been discussed (and could have been).
85	Appendix I, Section 4.1, page 23	Per the SCC, maximum allowable density and obstruction limitations shall not apply to public works projects that demonstrate that the floodwater displacement effects considered with the maximum floodwater displacement allowed per the SCC do not cause a cumulative increase in the BFE of more than one foot (Snohomish County, 2015). Thus, the relocation of Airport Way will not be considered during the evaluation of the maximum allowable density and maximum allowable obstruction for the study area.	Exemption from maximum allowable density and obstruction limitations does not equate to an exemption from environmental or floodplain impacts within the study area for this draft EA. Impacts are impacts. See comments 37, 38, and 44.

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<b>DATE: 5/24/2024</b>			<b>BY RYAN BARNES, RPB ENGINEERING</b>
86	Appendix I, Section 4.1, page 23	Floodplain hydraulic modeling, conducted in the 2018 Master Plan with a design consistent with the Proposed Action, confirm that the implementation of the Proposed Action, including the relocation of Airport Way, would result in a change in the 100-year (1 percent-annual-chance) BFE of 0.00 feet.	If the floodplain hydraulic modeling in the 2018 Master Plan was conducted over, assuming storage areas #2, #3, and #9 from Figure 6 (an estimated 700 acres), then the percentage of new impervious surface (9.5acres) over this area is at minimum 1.4% impacted land over this area. However, if a more refined floodplain hydraulic model could limit the model extents to flood storage #9 (which includes Hanson Slough) and is consistent with the draft EAs "discharge" locations (an estimated 320 acres), then the percentage of new impervious surface over this area is at minimum 3% impacted land over this area. More than 2 times greater. The percentage of impacted land would be greater still because the new impervious surface areas are assumed not to include the fill embankments. Consistent with other comments, a more refined hydraulic model may be appropriate given the semi-frequent flooding that occurs in the floodplains, climate change impacts on future storm events, and hydraulic flows near and in Hanson Slough not captured by a larger model.

## Response to Commenter A-5

1. The EA considers environmental consequences of the No Action Alternative and Proposed Action based on significance thresholds as outlined in Table 4-1 of FAA Order 1050.1F.
2. Increases in peak flow rates are less than 1 cubic foot per second through the 100-year storm for both stormwater outfalls. Section 3.4.4 in the Final EA has been revised to refer the reader to Section 3.16 in the Final EA, which has been revised to state that this increase in water quantity would be mitigated prior to discharge from Airport property through proposed permanent stormwater facilities. As local requirements for stormwater release rate and water quality treatment are achieved per the Snohomish County Drainage Manual (SCDM), significance thresholds would not be exceeded per FAA Order 1050.1F.
3. “Flow control” is referenced in Appendix I in the Final EA. Section 3.16.3 in the Final EA considers the SCDM Minimum Requirement #7 to reduce peak flow rates from proposed development flow rates of the pre-developed condition, which is representative of undeveloped forested conditions. The Proposed Action would be exempt from Minimum Requirement #7 but would still maintain proposed conditions flow rates less than or equal to existing conditions through the use of permanent stormwater facilities. The locations, type, and sizing of proposed permanent stormwater facilities will be determined in final design in accordance with SCDM criteria.
4. Section 3.16.3.5 in the Final EA has been revised to state that permanent stormwater facilities would be required to mitigate increase in peak flow rate and necessary water quality treatment. The locations, type, and sizing of proposed permanent stormwater facilities will be determined in final design.
5. The locations, type, and sizing of proposed permanent stormwater facilities will be determined in final design.
6. Consultation with the agencies (i.e., National Marine Fisheries Service [NMFS] and U.S. Fish and Wildlife Service [USFWS]) was ongoing at the time of the Draft EA publication. The USFWS issued a Letter of Concurrence on October 2, 2024, for the effects on bull trout and designated critical habitat (see Appendix C in the Final EA). However, NMFS held that the Proposed Action is likely to adversely affect Endangered Species Act (ESA)-listed salmonids, their critical habitat, and essential fish habitat for Pacific Coast salmon due to the effects from the pollutant 6PPD, and thus required formal consultation. Therefore, a revised BA was prepared and submitted to NMFS on September 5, 2024, with an adverse effect determination (see “NMFS Consultation” in Appendix C in the Final EA). NMFS issued their Biological Opinion on June 26, 2025. Appendix C in the Final EA has been updated with the results of the consultation with the agencies.

7. See the response to Comment #6 of this letter for discussion of ongoing consultation with NMFS and USFWS.
8. Section 3.4.4 in the Final EA has been revised to include a reference to Section 3.16 in the Final EA for a discussion of stormwater impacts.
9. Section 3.16.1.5 in the Final EA provides information on anticipated wetland mitigation.
10. Sections 3.16.2.3 and 3.16.2.4 in the Final EA have been revised to include a discussion of climate change and sea level rise based on published sources applicable to the Study Area in accordance with FAA Desk Reference 1050.1F, Section 3.5, Climate Adaptation. FAA Order 1050.1F does not identify sea level rise as an environmental impact category nor does FAA Order 1050.1G provide significance thresholds or factors to consider in its evaluation.
11. A coastal consistency determination was submitted and reviewed by the Department of Ecology, which demonstrates no impacts to coastal resources as a result of the Proposed Action. This is presented in Appendix D in the Final EA.
12. Sections 3.6.4.2, 3.16.2, 3.16.3, and 3.16.4 in the Final EA provide a discussion of relevant federal, state, and local regulations for coastal, floodplains, and shorelines resources. See the response to Comment #11 of this letter for coastal consistency as determined in consultation with the Department of Ecology.
13. Section 3.6.4.2 in the Final EA has been revised to clarify that listed stormwater facilities are intended to reduce erosion and transport of pollutants during construction phase.
14. Section 3.6.4.2 in the Final EA has been revised to state that the portion of the Proposed Action outside of the UGA with a Resource Shoreline Environment designation includes a road relocation, which is considered to be a permitted land use.
15. Sections 3.6.4.2 and 3.16.2.4 in the Final EA have been revised to include a discussion regarding Shoreline Conditional Use and Shoreline variance permits.
16. The figures referenced by the commenter are in the Affected Environment sections and are intended to show only the existing environmental conditions for each resource category that has the potential to be affected by the Proposed Action. For example, Figure 3-2 in the Final EA shows coastal resources using Snohomish County SMP Shoreline Environmental Designations. Specific components of the Proposed Action are not shown in these reference figures in accordance with FAA Order 1050.1F. The Study Area and Harvey Property, where the Proposed Action would be located, are shown in the referenced figures.
17. The Snohomish River is not listed as a wild and scenic river under the National Wild and Scenic Rivers System as it is located along significant development within its watershed, has been heavily modified with levees and other river structures, and does not meet

other criteria as established by relevant federal agencies. Refer to <https://www.rivers.gov/washington>.

18. As stated in Section 3.16.1.4 in the Final EA, wetland function could be altered for Wetland A with implementation of the Proposed Action, depending upon the future roadway design. Avoidance and minimization measures will be implemented as a first step during the final design process. If necessary, mitigation measures will be used to provide no net loss of wetland functions and values.
19. Section 1.1.3 has been added to the Final EA to provide an overview on flooding history, levees, and flood control improvements in the Study Area. Levees surrounding the Study Area are designed to be 1 foot above the 5-year (20% annual chance) flood event. In flooding events greater than the 5-year (20% annual chance) flood event, which would result in levee overtopping, the Harvey Property, including Hanson Slough, becomes one effective storage area designated as Storage Area #9 (see Figure 3-26 in the Final EA). Appendix I in the Final EA has been revised to include floodplain modeling for the Proposed Action. Floodplain modeling that was inclusive of airfield and roadway improvements indicates that the FEMA-established BFEs would not increase as a result of the Proposed Action for the regulatory 100-year (one percent-annual-chance) flood event. Additional floodplain modeling will be conducted in final design and the Proposed Action will be required to demonstrate that it does not contribute to a cumulative increase in Base Flood Elevations (BFEs) that exceeds the limits prescribed in the Snohomish County Code 30.65 to obtain the County Flood Hazard Permit. Appendix I in the Final EA has been revised to also include analysis of change in flood elevations for non-regulatory flood events that are less than the FEMA-regulatory 100-year (1-percent-chance) flood event.
20. Additional flood storage areas are present due to levees along this section of the Snohomish River. These additional flood storage areas are shown on Figure 3-26 in the Final EA for completeness of floodplain hydraulic conditions.
21. See the response to Comment #19 of this letter for a discussion of analyzed flood return frequencies. Existing floodwater discharge locations shown in Figure 3-26 in the Final EA would not be modified by the Proposed Action.
22. See the response to Comment #16 of this letter for a discussion of the purpose of Affected Environment sections. Figures 3-25 and 3-26 in the Final EA provide the existing environmental conditions and show the Study Area and Harvey Property boundary. Figures 3-28, 3-29, and 3-30 in the Final EA show the impacts of the Proposed Action on floodplains.
23. Section 3.16.2.3 in the Final EA describes the floodplain regulations pertinent to development in the Study Area and define existing environmental conditions. Executive Order 14030, which reinstated the Federal Flood Risk Management Standard (FFRMS),

was revoked in early 2025; therefore, the standards established in the FFRMS are no longer applicable for the Proposed Action and have been removed from the Final EA.

24. See the response to Comment #23 of this letter for discussion of the FFRMS. In accordance with FAA Order 1050.1F, Section 3.16.2.3 in the Final EA describes the floodplain regulations pertinent to development in the Study Area.
25. See the response to Comments #19 of this letter for a discussion of floodplain modeling results. The commenter's statement references the density fringe development criteria from Snohomish County Code (SCC) 30.65.240, which is accurately referenced with a footnote in Section 3.16.2.3 in the Final EA.
26. See the response to Comments #19 of this letter for a discussion of floodplain modeling results.
27. In accordance with FAA Desk Reference 1050.1F, the Environmental Consequences sections of the EA are intended to discuss the Proposed Action and any potential impacts upon the Affected Environment. As noted in Section 3.16.2.4 in the Final EA, the road relocation project component of the Proposed Action would be exempt from the density fringe requirements, as it is considered a Public Works project by the County.
28. The 2018 MP is available on Harvey Field's website at <https://sites.jviation.com/harveyfield/2018-documents.html>. Appendix I in the Final EA has been revised to include floodplain modeling for the Proposed Action. Floodplain modeling that was inclusive of airfield and roadway improvements indicates that the FEMA-established BFEs would not increase as a result of the Proposed Action for the regulatory 100-year (one percent-annual-chance) flood event.
29. The location, number, and size of culverts under the relocated Airport Way will be determined in final design to ensure continuity of floodwaters and management of stormwater runoff. Approximate locations can be seen in Figure 3-35 in the Final EA.
30. The 2018 MP and Final EA included floodplain modeling to determine the change in flood elevation for both the proposed airfield and roadway improvements consistent with those described in the Proposed Action. The 2018 MP and the Final EA considered all topographic features in Storage Area #9 (see Figure 3-26 in the Final EA), including Hanson Slough.
31. See the response to Comment #29 of this letter for a discussion of proposed drainage infrastructure.
32. The EA considers consequences of the No Action Alternative and Proposed Action based on significance thresholds required by FAA Order 1050.1F. The Proposed Action would meet Density Fringe development criteria as discussed in Section 3.16.2.4 in the Final EA.

33. Executive Order 14030, which reinstated the Federal Flood Risk Management Standard (FFRMS), was revoked in early 2025; therefore, the standards established in the FFRMS are no longer applicable for the Proposed Action and have been removed from the Final EA.
34. See the response to Comment #33 of this letter for a discussion of the FFRMS.
35. See the response to Comment #33 of this letter for a discussion of the FFRMS. Sections 3.16.2.3 and 3.16.2.4 in the Final EA have been revised to include discussion of climate change and sea level rise through the useful life of the Proposed Action based on published sources applicable to the Study Area in accordance with FAA Desk Reference 1050.1F, Section 3.5, Climate Adaptation. FAA Order 1050.1F does not identify sea level rise as an environmental impact category nor provide significance thresholds, or factors to consider in its evaluation.
36. See the response Comment #33 of this letter for a discussion of the FFRMS.
37. See the response to Comment #19 of this letter for a discussion of floodplain modeling.
38. See the response to Comment #19 of this letter for a discussion of floodplain modeling.
39. See the response to Comment #19 of this letter for a discussion of floodplain modeling.
40. See the response to Comments #19 and #30 of this letter for a discussion of floodplain modeling.
41. See the response to Comments #19 and #30 of this letter for a discussion of floodplain modeling.
42. See the responses to Comments #19 of this letter for a discussion of regulatory flood return frequencies and floodplain modeling. Appendix I in the Final EA has been revised to include floodplain modeling for the Proposed Action. The modeling was performed using the UNET hydraulic model of the Snohomish River used to develop the effective FEMA study of 2005, which included storage areas from the mouth of the Snohomish River, up through the study area. Floodplain modeling that was inclusive of airfield and Airport Way improvements indicates that the FEMA-established BFEs would not increase as a result of the Proposed Action for the regulatory 100-year (one percent-annual-chance) flood event. Appendix I in the Final EA has been revised to also include analysis of change in flood elevations for non-regulatory flood events that are less than the FEMA-regulatory 100-year (1-percent-chance) flood event.
43. See the responses to Comments #3 and #4 of this letter for a discussion of release rate requirements and proposed permanent stormwater facilities, respectively.
44. See the response to Comment #19 of this letter for a discussion of floodplain modeling.

45. Suspension and spread of pollutants as a result of flooding is an existing floodplain process that would not be affected by the Proposed Action as levees would not be modified. Proper floodproofing would be required during construction of the Proposed Action. Additionally, the Industrial Stormwater General Permit (ISGP) would outline floodproofing requirements for industrial chemicals present at the Airport. Maintenance of proposed stormwater facilities would be maintained in accordance with SCDM Volume VI to minimize resuspension of pollutants during flooding events.
46. Section 3.16.3.4 in the Final EA has been revised to clarify that the elevation of the existing Airport Way embankment would not be substantially modified; therefore, stormwater runoff would reasonably continue to flow to existing outfalls. As a result, drainage boundaries are assumed to not be modified because of the Proposed Action. Runoff from relocated Airport Way would discharge from Airport property to the south and would not modify the basin boundary.
47. Sections 3.16.3.3 and 3.16.3.4 in the Final EA have been revised to include downstream conveyance into Batt Slough for runoff in the southern portion of Harvey Property.
48. See the response to Comment #2 of this letter for a discussion of mitigation of increased peak runoff rates.
49. The commenter's statement regarding changes in hydrologic conditions is noted.
50. See the response to Comment #29 of this letter for a discussion of proposed drainage infrastructure.
51. See the response to Comment #29 of this letter for a discussion of proposed drainage infrastructure.
52. Culverts under the proposed runway, which are shown in Figures 3-28, 3-29, and 3-30 in the Final EA, are used in demonstrating conformance to density fringe development requirements. As noted on these figures, improvements related to the relocation of Airport Way are not included for clarity of development that is applicable to density fringe calculations. Additional proposed culverts underneath Airport Way are shown in Proposed Hydrologic Conditions (see Figure 3-35 in the Final EA) to demonstrate continuity of conveyance of runoff to stormwater outlets in the proposed condition. As relocated Airport Way is considered exempt from density fringe development criteria, culverts underneath relocated Airport Way have not been reviewed by Snohomish County. The location, number of culverts, and culvert sizing will be completed in final design.
53. Section 3.16.3.4 and Appendix I in the Final EA have been revised to include hydrologic analysis of the 100-year (1% annual chance) storm event.

54. Section 3.16.3.5 in the Final EA has been revised to include proposed permanent stormwater facilities that will be constructed on Harvey Property to mitigate increases in stormwater runoff and provide necessary water quality treatment.
55. The locations, type, and sizing of proposed permanent stormwater facilities will be determined in the final design. Detailed hydrology and hydraulic modeling will be conducted in final design and for permitting through Snohomish County.
56. See the response to Comment #54 of this letter for a discussion of mitigation of increased peak runoff rates.
57. See the response to Comment #45 of this letter for a discussion of pollutant transport during flooding events.
58. See the response to Comment #45 of this letter for a discussion of pollutant transport during flooding events.
59. An ISGP provides requirements for non-structural controls for adequate handling procedures and secondary containment for industrial chemicals, which the Airport Sponsor would adhere to.
60. See the response to Comment #33 of this letter for a discussion of the FFRMS.
61. See the response to Comment #42 of this letter for a discussion of floodplain modeling.
62. See the response to Comment #46 of this letter for a discussion of proposed drainage conditions.
63. See the response to Comment #54 of this letter for a discussion of mitigation of increased peak runoff rates.
64. The EA documents that significance thresholds for surface waters required by FAA Order 1050.1F are not exceeded because of the Proposed Action.
65. The Snohomish River is not listed as a wild and scenic river under the National Wild and Scenic Rivers System as referenced with the sources in the footnotes in Section 3.2.1 in the Final EA.
66. See the response to Comment #6 of this letter for a discussion of consultation efforts with NMFS and USFWS.
67. Sections 3.6.4.2 and 3.16.2.4 in the Final EA have been revised to provide additional discussion regarding Shoreline Conditional Use and Shoreline variance permits.
68. See the responses to Comments #10 and #42 of this letter for a discussion of climate resiliency and floodplain modeling, respectively.

69. See the response to Comment #46 of this letter for a discussion of proposed drainage conditions.
70. See the response to Comment #46 of this letter for a discussion of proposed drainage conditions.
71. A Stormwater Site Plan in accordance with SCDM Minimum Requirement #1 will be completed in the final design phase as the locations, type, and sizing of proposed permanent stormwater facilities will be determined in final design.
72. Appendix I in the Final EA indicates that structural and non-structural controls for industrial chemicals would be implemented in accordance with requirements of the ISGP, industrial SWPPP, and SPCC plans. SCDM Minimum Requirement #3 will be met during the operational phase of the Proposed Action.
73. See the response to Comment #46 of this letter for a discussion of proposed drainage conditions.
74. See the response to Comment #54 of this letter for a discussion of mitigation of increased peak runoff rates. Section 3.16.3.5 in the Final EA and Appendix I in the Final EA have been revised to state that increase in peak flow rates would be mitigated through permanent stormwater facilities. SCDM Minimum Requirement #4 will be met during the operational phase of the Proposed Action.
75. Per SCDM Volume I Section 2.5.5, as the Proposed Action is exempt from SCDM Minimum Requirement #7, proposed development does not have to achieve Low Impact Development (LID) performance standards for SCDM Minimum Requirement #5. As noted in SCDM Table 1.1, implementation of BMP T5.13, Post-Construction Soil Quality and Depth, would be required for the Proposed Action if feasible. BMPs listed in Appendix I in the Final EA and in Section 3.16.3 in the Final EA adhere to List #2 for projects triggering SCDM Minimum Requirements #1 through #9.
76. Appendix I in the Final EA has been revised to state that water quality treatment volumes presented in the EA include treatment for replaced hard surfaces within disturbed areas.
77. See the response to Comment #75 of this letter for a discussion of adherence to SCDM Minimum Requirements.
78. SCC 30.63A.210 discusses projects that do not discharge to a Municipal Separate Storm Sewer (MS4) system. As shown in Figure 3-34 in the Final EA, the Study Area is located in the Snohomish County Phase I MS4 jurisdiction. Per SCDM Volume I, Section 2.3.7, the Proposed Action would be exempt from SCDM Minimum Requirement #7 as it discharges to the County MS4 system and is drained by a conveyance system that is comprised of manmade conveyances to the high-water mark of the Snohomish River, which is an exempt tidal waterbody.

79. Appendix I in the Final EA has been revised to state that LID performance standards will not be required as the Proposed Action is exempt from SCDM Minimum Requirement #7.
80. See the response to Comment #55 of this letter for a discussion of proposed drainage infrastructure and modeling.
81. See the response to Comment #3 of this letter for a discussion of release rate requirements.
82. Permanent stormwater facilities will be required to meet SCDM Minimum Requirements #5. The locations, type, and sizing of proposed permanent stormwater facilities will be determined in final design.
83. See the response to Comment #82 of this letter for a discussion of mitigation of increased peak runoff rates.
84. See the responses to Comments #54 and #82 of this letter for a discussion of mitigation of increased peak runoff rates.
85. See the response to Comment #37 of this letter for a discussion of floodplain modeling.
86. See the responses Comments #19, #33, #35, and #42 of this letter for a discussion of FFRMS and floodplain modeling.



STATE OF WASHINGTON  
**DEPARTMENT OF ECOLOGY**

Northwest Region Office  
PO Box 330316, Shoreline, WA 98133-9716 • 206-594-0000

May 24, 2024

Cindy Harvey  
US Federal Aviation Administration  
9900 Airport Way  
Snohomish, WA 98296

**Re: Harvey Field Runway Improvement Project  
Ecology SEPA# 202401606**

Dear Cindy Harvey:

Thank you for the opportunity to provide comments on the National Environmental Policy Act (NEPA) environmental assessment (EA) process for the Harvey Field Runway Improvement Project. Based on review of the checklist associated with this project, the Department of Ecology (Ecology) has the following comments:

1

The wetlands delineated on this property would be waters of the state subject to the applicable requirements of state law (see RCW 90.48 and WAC 173.201A) and Section 401 of the Clean Water Act (33 USC §1341) and 40 CFR Section 121.2. Because direct impacts to Wetland A will occur from the proposed action, the applicant shall obtain all necessary state and federal authorizations prior to beginning any ground-disturbing activities or vegetation removal. To obtain state and federal authorization, you should provide:

- A jurisdictional determination from the U.S. Army Corps of Engineers stating which delineated wetlands on the property are under federal jurisdiction.
- A JARPA form for impacts to jurisdictional wetlands submitted to Ecology at [ecyrefedpermits@ecy.wa.gov](mailto:ecyrefedpermits@ecy.wa.gov).
- For any non-federally regulated wetlands that the U.S. Army Corps of Engineers does not take jurisdiction for, submit a JARPA to Ecology at [ecyrefedpermits@ecy.wa.gov](mailto:ecyrefedpermits@ecy.wa.gov) so we can issue an Administrative Order.

- 1 • A mitigation plan for unavoidable wetland impacts following the standards in Wetland Mitigation in Washington State – Part 1: Agency Policies and Guidance (Ecology Publication # 21-06-003).

Thank you for considering these comments from Ecology. If you have any questions or would like to respond to these comments, please contact Doug Gresham from the Shorelands and Environmental Assistance Program at (425) 429-1846 or by email at [doug.gresham@ecy.wa.gov](mailto:doug.gresham@ecy.wa.gov).

Sincerely,



Delaney Anderson  
ERTS & SEPA Coordinator

Sent by email: Cindy Harvey, [cyndyh@harveyfield.com](mailto:cyndyh@harveyfield.com)

ecc: Doug Gresham, Ecology

## Response to Commenter A-6

1. The A jurisdictional determination of wetlands for the project area would be coordinated with the U.S. Army Corps of Engineers and Washington State Department of Ecology during final design. The mitigation measures proposed in Section 3.16.1.5 in the Final EA are not final and would be subject to the jurisdictional determination and U.S. Army Corps of Engineers Section 404 permit. A Joint Aquatic Resources Permit Application (JARPA) form would also be submitted to the Department of Ecology.

Appendix K.2

***Public Comments Received on Draft EA and Responses to  
Comments***

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## Introduction

Members of the public were invited to comment on the Draft EA. Comments were accepted through emails, the project website, and handwritten in person at the Draft EA Open House. The Draft EA review period lasted 42 days from April 12, 2024, to May 24, 2024, during which members of the public could submit comments regarding the Draft EA.

The table below lists the members of the public that commented on the Draft EA, and their corresponding commenter number. The following pages list full comments followed by the responses.

Name	Commenter Number
Barbara Bailey	P-1
Morgan Davis	P-2
Michael Edwards	P-3
Norman Moss	P-4
Mel Chandler	P-5
Candace McKenna	P-6
Penelope Guntermann	P-7
Cindy Hansen	P-8
Barbara Bailey	P-9
Barbara Bailey	P-10
Barbara Bailey	P-11
Steve Russo	P-12
Mark Janis	P-13
John Misich	P-14
Don Satko	P-15
Barbara Bailey	P-16
Barbara Hawkins	P-17
Richard Softye	P-18
Beth Jarvis	P-19
Monica Van der Vieren	P-20
Doug Bates	P-21
Andrew Carlson	P-22
Dena VanDuine	P-23
Doug Bates	P-24
Janet Satko	P-25
Christine Wakefield Nichols	P-26
Barbara Bailey	P-27
John Misich	P-28
John First	P-29
Julie Garner	P-30
Candace McKenna	P-31
Mark Miller	P-32

Appendix K – Comments Received on Draft EA and Responses to Comments

Name	Commenter Number
Unknown	P-33
Karyn King and Joe Griffith	P-34
Bonnie Shorin	P-35
111 <sup>th</sup> St SE Neighborhood Watch	P-36
Richard Nutt	P-37
Chuck Shields	P-38
Lee Eddie	P-39
Barbara King	P-40
Corey King	P-41
Cathy Dugor	P-42
Candace McKenna	P-43
John Budd	P-44
Will Stillwell	P-45
Barbara Bailey	P-46
Marjorie Fields	P-47
Steve Russo	P-48
Ant Hol	P-49
Edward Carr	P-50
Don Wells	P-51
Shane Tully	P-52
Don Satko	P-53
Kathleen Pozarycki	P-54
English	P-55
Pat Phillips	P-56

## Commenter P-1

**From:** Barb Bailey  
**To:** [dave.somers@co.snohomish.wa.us](mailto:dave.somers@co.snohomish.wa.us); [Eric.Parks@co.snohomish.wa.us](mailto:Eric.Parks@co.snohomish.wa.us); [ken.klein@snoco.org](mailto:ken.klein@snoco.org); [m.mccrory@snoco.org](mailto:m.mccrory@snoco.org); [michael.dobesh@snoco.org](mailto:michael.dobesh@snoco.org); [Sam.Low@snoco.org](mailto:Sam.Low@snoco.org); [jared.mead@snoco.org](mailto:jared.mead@snoco.org); [Dunn.Megan@snoco.org](mailto:Dunn.Megan@snoco.org); [nate.nehring@snoco.org](mailto:nate.nehring@snoco.org); [strom.peterson@snoco.org](mailto:strom.peterson@snoco.org); [Linda.Redmon@snoco.org](mailto:Linda.Redmon@snoco.org); [kuleta@snohomishwa.gov](mailto:kuleta@snohomishwa.gov); [neals@snohomishwa.gov](mailto:neals@snohomishwa.gov); [merrill@snohomishwa.gov](mailto:merrill@snohomishwa.gov); [flynn@snohomishwa.gov](mailto:flynn@snohomishwa.gov); [l.burke@snohomishwa.gov](mailto:l.burke@snohomishwa.gov); [guzak@snohomishwa.gov](mailto:guzak@snohomishwa.gov); [eidem@snohomishwa.gov](mailto:eidem@snohomishwa.gov); [hetherington@snohomishwa.gov](mailto:hetherington@snohomishwa.gov); [Van.Hoff.Scott@usace.army.mil](mailto:Van.Hoff.Scott@usace.army.mil); [charles.h.iff@usace.army.mil](mailto:charles.h.iff@usace.army.mil); [douglas.t.weber@usace.army.mil](mailto:douglas.t.weber@usace.army.mil); [erik.stockdale@co.snohomish.wa.us](mailto:erik.stockdale@co.snohomish.wa.us); [Marshland.Flood.Control@snoco.org](mailto:Marshland.Flood.Control@snoco.org); [lucia.schmit@snoco.org](mailto:lucia.schmit@snoco.org); [dara.salmon@snoco.org](mailto:dara.salmon@snoco.org); [kelly.snyder@co.snohomish.wa.us](mailto:kelly.snyder@co.snohomish.wa.us); [dmcormick@snoco.org](mailto:dmcormick@snoco.org); [donald.hubner@noaa.gov](mailto:donald.hubner@noaa.gov); [kim.kratz@noaa.gov](mailto:kim.kratz@noaa.gov); [ryan\\_mcreynolds@fws.gov](mailto:ryan_mcreynolds@fws.gov); [casework@murray.senate.gov](mailto:casework@murray.senate.gov); [suzan.delbene@mail.house.gov](mailto:suzan.delbene@mail.house.gov); [maria@cantwell.senate.gov](mailto:maria@cantwell.senate.gov); [mike\\_spahn@murray.senate.gov](mailto:mike_spahn@murray.senate.gov); [jami\\_burgess@cantwell.senate.gov](mailto:jami_burgess@cantwell.senate.gov); [john.lovick@leg.wa.gov](mailto:john.lovick@leg.wa.gov); [Ibrahimovic.Semir@leg.wa.gov](mailto:Ibrahimovic.Semir@leg.wa.gov); [April.Berg@leg.wa.gov](mailto:April.Berg@leg.wa.gov); [brandy.donaghy@leg.wa.gov](mailto:brandy.donaghy@leg.wa.gov); [Barrow.Julie@harveyfield.com](mailto:Barrow.Julie@harveyfield.com)  
**Date:** Saturday, May 4, 2024 12:12:38 PM  
**Attachments:** [020 Coordinated Diking Council opposition to Harvey Airfield expansion 2007.pdf](#)

May 3, 2024

Re: Harvey Airfield Expansion Draft EA

To Julie Barrow, RS&H

1 Harvey Airfield has been trying to expand the airport further into the floodplain for over 20 years despite consistent opposition from the community and the local elected officials at the County, State, City, and flood control district levels. Privately owned Harvey Airfield has run a successful business with the current runway configuration over the past 80 years. I understand the airport does not like the current limitations they face, but for this plan to move forward, federal, state, and county floodplain protections will have to be circumvented. These floodplain development policies protect the life and property of floodplain residents as well as the public roads and infrastructure we all use. All residents and businesses in the floodplain face limitations. Harvey Airfield should be no different.

These airport master plan updates sponsored by Harvey Field are coming at huge taxpayer expense. According to the FAA website, Harvey Field received \$2,439, 077.00 in 2021 for this latest plan. We the taxpayers are funding the studies and we the taxpayers will fund the construction cost of the project benefitting the airport owner. And then we the taxpayers will fund the cost of flood damage repair.

2 As far as an Environmental Assessment, I believe a brief look at the history of frequent and severe flooding in this area should have halted further discussion many years ago. We locals all know how badly it floods around here and we all know it is going to keep flooding.

I am hoping that my flood photographs, newspaper stories, and home video recordings taken over the years documenting our flood history will be taken into consideration by the powers that be.

My husband and I live on a 5<sup>th</sup> generation family farm about a mile south of Harvey Airfield. All of us in the Snohomish River Valley have experienced frequent and severe flooding over the past 50 plus years. This includes Harvey Airfield. The proposed airport expansion into the low-lying floodplain known as Hanson Slough is very concerning. We believe this development would significantly and possibly catastrophically increase the flood hazard for all of us sharing this floodplain.

The Snohomish River lies just east of Harvey Airfield. When it floods, the water flows over the levee and then under the railroad trestle 12 ft. openings into Hanson Slough, the area designated for airport expansion. The plan includes re-routing Airport Road along the eastern edge of Hanson Slough. The floodwater flow under the 12 ft. railroad trestle would be blocked by the re-routed Airport Road. This blockage would increase the upstream water levels, thus threatening the neighbors to the south. Hanson Slough is critical to floodwater conveyance.

Obstruction of floodwater conveyance is what causes our levees to fail. Levee failure in our area has a well-documented history of catastrophic consequences.

2

I do not believe the history of frequent and severe flooding in this area was addressed in the EA even though many comments were received from the public. No mention is made of past levee failures. No mention is made of the millions in damages and life-threatening conditions that past Snohomish River floods in this area have caused. No mention is made of the past flood damages at Harvey Field, especially the levee break in 1990 that destroyed airplane hangers and left airport offices flooded in several feet of water.

As Kandace Harvey said in the 11/29/1990 edition of the Everett Herald: *"I can't believe it', Kandace Harvey said as she took in the damage receding flood waters had just revealed, her expression a marriage of pain and awe. 'It's (the damage) so much worse than we ever anticipated. It's like an explosion hit'". ...In the building she had just left were computer and communications systems that would never work again, ruined furniture and a kitchen recently remodeled...that looked like it had been hit by a tornado."*

I am including a 1990 photo of a helicopter rescue at Airport Rd. bordering Harvey Field. I am including a 1990 photo of a home knocked off it's foundation on Airport Rd. bordering Harvey Field. I am including a 1990 photo of the Airport Rd. washout bordering Harvey Field. I am including a 1990 photo of Springhetti Rd. flood damage bordering the south side of Hanson Slough at what is now Big Trees nursery. I am including a 1990 photo of Springhetti Rd. flooding and damage a mile south of Harvey Field at our farm.

I am including flood photos from 1975, 1990, 1995, 2006, and 2009 showing the 8 to 10 feet of floodwater in Hanson Slough and flooding in and around Harvey Airfield. Once again, I would like to emphasize that this area has a history of frequent and severe flooding with catastrophic consequences. **Where is that documented in the EA?** It is not even mentioned. Following is a 2006 home video following the Election Day Flood showing Harvey Airfield and the proposed area for expansion into Hanson Slough:

<https://www.dropbox.com/scl/fi/id656upw7rtma8fnj30wy/2006-flood-at-Harvey-Field-Hanson-Slough.mp4?rlkey=ecqmxeuys2fwzud8cr5uptqs&dl=0>

The 11/26/1990 Everett Herald article quotes Ron Knutsen who was with his parents on 111<sup>th</sup> St. which borders the southern edge of Hanson Slough. *"It was the closest to death I've ever been in my life' Ron Knutsen of Snohomish said after watching the levee near his parents' farm break. 'The whole dike exploded like Mount St. Helens. Then it was kind of like the Snohomish River was aimed at our house.' Knutsen said he had barely enough time to grab a ladder and his father's heart medicine, call 911 and scramble with his parents to the roof before the house began to shake. 'You say your prayers,' he said. The Knutsens were among more than two dozen farm residents near Snohomish who were rescued by helicopter Sunday."* Here is a 1990 home video I took when we walked along 111<sup>th</sup> St. after the flood showing the Knutsen house knocked off its foundation.

<https://www.dropbox.com/scl/fi/2rbfx98crptcka6s742ox/1990-flood-damages-111th-St.-just-S.-of-Hanson-Slough.mp4?rlkey=y1vz7kifyo17s2axd3cwtf793&dl=0>

Another article in the 11/26/1990 Everett Herald quotes my husband: *"It was like a tidal wave,' Snohomish farmer Don Bailey said after a dike holding back the rain gorged Snohomish River broke near his family's 60-year old house. 'It filled the whole valley.'"* Our farm is located in

2

the center bottom of the EA Figure 3-26 Flood Storage Areas. Following is the 1990 flood view looking north towards Harvey Airfield. The floodwater filled the entire valley across Hwy 9 to the bottom of Seattle Hill.

<https://www.dropbox.com/scl/fi/4ob56saakf8hpoaiot1hd/1990-1126-flood-view-from-Bailey-Farm.mp4?rlkey=55a7nbazpapi609qoxfvlrkr&dl=0>

In 2007, The 21 member Coordinated Diking Council submitted a letter of opposition to the Harvey Airfield expansion plan. As the Chairman of the CDC, Barney Bagwell wrote:

*“The Coordinated Diking Council, whose members comprise the elected Commissioners of Snohomish River Valley, diking, drainage, and flood control districts, stand united in our opposition to the proposed landfill required for the Harvey Airfield expansion plan.*

*The proposed fill is diametric to the goals and purpose of the Snohomish River Comprehensive Flood Control Management Plan developed jointly by Snohomish County Surface Water Management and the CDC membership and adopted by the Snohomish County Council.*

*The wisdom of that plan was clearly demonstrated by the Election Day Flood of November 2006 when the Snohomish River Valley endured a near-record flood and no levees were breached. The Harvey fill proposal threatens to destroy the parity created by the comprehensive plan.”*

The multi-generational families living in the Snohomish River floodplain know and respect the power of the flooding Snohomish River better than any outside consultant who can selectively manipulate data to come up with whatever result they are being paid for. A site visit to Hanson Slough in June is much different than what Hanson Slough looks like in every major flood event, a body of water filled with 8 to 10 feet of water.

The local experts on our floodplain are the hydraulic engineers who work for Snohomish County’s Surface Water Department. They know how our levee system works and they are familiar with the history of catastrophic levee failure in this area. Consultation with Snohomish County Surface Water Management Department should be a requirement of the EA.

As Snohomish County hydraulic engineer, Vaughn Collins said right before the Nov. 2006 flood, *“If the forecast holds, the Snohomish River Valley will look like a giant lake. It will flood deeper than it’s ever been flooded before.”* The Everett Herald article goes on to say: *Experts fear the floodwater may punch through the system of dikes and levees that protect thousands of acres of fertile farmland, at least three major highways and the homes of nearly 25,000 people. “The levees and dikes will be under ‘tremendous pressure’ “ (Vaughn) Collins said.*

Here is what the 1990 levee breach at Tim Stocker’s farm bordering our farm looked like:

<https://www.dropbox.com/scl/fi/7lkfz2wziwajthlfdtsgq/1990-1128-levee-break-at-Tim-Stocker.mp4?rlkey=vpf68p31plbdtbbidqizns96w&dl=0>

In the “Why It Wasn’t Worse” Everett Herald article after the November 2006 flood, the coordinated levee system was credited with **preventing** catastrophic losses. *Experts believed the coordinated flood-protection system would work more like a pressure-release valve, bleeding off the river’s energy when the water got too high. And 16 years later, it worked perfectly, said Vaughn Collins, hydraulic engineer for Snohomish County.* This coordinated levee system would be compromised by the Harvey Airfield floodplain obstruction at Hanson Slough.

Snohomish County’s Department of Emergency Management (DEM) is also very familiar with the flood history in our area. They are responsible for the evacuation and rescue operations

2 during a flood. According to the DEM website: “Flood – More than 75,000 people in Snohomish County live and work in places where potentially devastating flood occur. Historically, the major river basins – the Snohomish and Stillaguamish – have flooded every three to five years, often at the same time....Since 1962, the county has weathered 18 floods large enough to be **Presidentially declared disasters**. The worst arrived during winter 1975, causing \$42 million damage and the deaths of 3,500 head of livestock.” Snohomish County DEM would be a valuable resource when analyzing the flooding consequences of the proposed airport expansion. Consultation with Snohomish County DEM should be a requirement of the EA.

FEMA Region 10 is the federal expert for our floodplain. FEMA helps fund levee improvements in our area. FEMA also helps pay for levee restoration when levees fail. Consultation with FEMA Region 10 should be a requirement of the EA.

The U.S. Army Corps of Engineers is called into action when our levees are breached. They also fund and repair faulty sections of our levees. These engineers know our levee system well. Consultation with the U.S.A.C.E. should be a requirement of the EA.

Following are my specific comments on the EA. Excerpts from the EA are in red.

3 P 1-1 EA

### 1.1 Airport Overview

*The Airport is about one mile south of the City of Snohomish’s Central Business District and is part of the County’s Urban Growth Area (UGA), **Figure 1-2** shows Airport property as well as additional land that the Airport Sponsor owns around the Airport (i.e., Harvey Property), including a parcel of land to the north across the Burlington Northern Santa Fe (BNSF) railroad tracks.<sup>1</sup> which encourages urban growth within this area.<sup>2,3</sup> The Airport Sponsor owns 208 acres, of which, 87 acres is Airport property. The original runway was first constructed in 1945 at what was known as Snohomish Airfield, Inc., along with hangars, a motel, and the fueling area. Additional structures, including the administration building, maintenance shop, and restaurant were added in 1947.<sup>4</sup>*

Comment: All the airport property is in the Density Fringe floodplain designation which limits floodplain development activity. All current airport operations are in the Snohomish UGA. The low-lying farmland where the runway relocation would go to the south, commonly known as Hanson Slough is not in the UGA. Airport use is allowed only in the UGA Density Fringe, but not into Hanson Slough which is outside the UGA.

4 P 1-5 EA

*The asphalt pavement surface for Runway 15L/33R was rehabilitated in 2021 due to cracking, weathering, rutting, and depressions in the pavement*

Comment: The Airport proposal would destroy the existing runway which just received a 1.1 million dollar taxpayer funded reconstruction.

According to the FAA website, Harvey Airfield received the following funding:

2014: \$549,920 – to update Airport Master Plan Study and Wildlife Hazard Assessments

2020: \$166,666 – for runway rehabilitation

2021: \$1,101,380 - to reconstruct runway

2021: \$2,439, 077 – to conduct Airport Environmental Assessment Plan/Study

4

2021: \$23,000 – CRRSA (Coronavirus Response & Relief Supplemental Appropriation Act)

2021: \$59,000 – ARPA (American Rescue Plan Act of 2021)

Comment: In the last 10 years Harvey Airfield has received over 4 million dollars.

5

P 1-20 EA

About 3.3 acres of fill that meets FAA specifications would be needed for the airfield project components, and about 6.0 acres of fill that meets FAA specifications would be needed for the roadway relocation.<sup>38</sup>

Comment: This project would require 9.3 acres of fill in the floodplain. How do you reconcile that large amount of fill with the floodplain protections provided by the Shoreline Management Program outlined below in the EA? The area where the runway and road relocation would occur in Hanson Slough is not in the Urban Shoreline. The Shoreline Management Program protects floodplains and Resource lands. Hanson Slough is both.

6

P 3-80 EA

<sup>16</sup>

Table 3-17 Shoreline Development Requirements

**Floodplains<sup>164</sup>**

Preserve and protect ecological functions and processes necessary to maintain shoreline natural resources, protect public health and safety, and preserve beneficial uses of the shoreline.

Preserve and protect the ecological functions and values of the County's shoreline areas to ensure no net loss.

Protect natural floodplain processes where feasible.

--

**Transportation Facilities<sup>165</sup>**

Locate and design transportation systems to minimize the disruption of natural habitat, floodplains, wetlands, geologically hazardous areas, resource lands, and other elements of environmentally sensitive areas. Where disruption cannot be avoided, designs shall minimize the disruption and impacts shall be mitigated.

Locate and design new and expanded transportation facilities to avoid the need for structural shoreline stabilization within a channel migration zone or floodway.

Locate and design transportation facilities to avoid or minimize impacts to shoreline ecological functions, especially channel migration and conveyance of flood waters and large woody debris.

Design and locate new and expanded transportation facilities away from shoreline areas to ensure no net loss of shoreline ecological functions, preserve the natural landscape, and minimize conflicts with existing and planned uses.

Comment: As mentioned before, this frequently flooded area has a history of severe and catastrophic floods. Altering the conveyance of floodwaters here increases the risk to public health and safety.

7

P 3-13 EA

### 3.6 Coastal Resources

The Coastal Barrier Resources Act, Coastal Zone Management Act, and National Marine Sanctuaries Act are the primary regulations that **protect coastal resources**. According to FAA Order 1050.1F coastal resources include all natural resources occurring within coastal waters and their adjacent shorelands such as islands, transitional and intertidal areas, salt marshes, wetlands, **floodplains**, estuaries, beaches, dunes, barrier islands, coral reefs, fish and wildlife, and their respective habitats. The coastlines of the Atlantic Ocean, Pacific Ocean, Great Lakes, and Gulf of Mexico are all coastal resources.

#### 3.6.1 Significance Threshold

The FAA has not established a significance threshold for coastal resources however, the FAA has identified factors to consider when evaluating the context and intensity of potential environmental impacts on coastal resources Factors to consider that may be applicable to coastal resources include, but are not limited to, situations in which the proposed action or alternative(s) would have the potential to:

- Be inconsistent with the relevant state coastal zone management plan(s);
- Impact a coastal barrier resources system unit (and the degree to which the resource would be impacted);
- Pose an impact to coral reef ecosystems (and the degree to which the ecosystem would be affected);
- **Cause an unacceptable risk to human safety or property;** or
- Cause adverse impacts to the coastal environment that cannot be satisfactorily mitigated.

Comment: As mentioned before, the blockage of floodwater conveyance by relocating Airport Rd puts additional pressure on our levee system. This area has a long history of frequent and severe flooding and levee failures with life threatening consequences as well as significant personal

property damage and damage to County and State roads, water, fiber optic, telephone, and power lines. Following is a 1990 home video showing the damage to Springhetti Rd. bordering the south side of Hanson Slough.

<https://www.dropbox.com/scl/fi/ed4hcnsb92c25b1ywy4gu/1990-Springhetti-Rd-bordering-S.-side-of-Hanson-Slough.mp4?rlkey=elzbyd9l6bu4bo0prj046lmj4&dl=0>

8

P 3-37 EA

The County land use designation in the northern portion of the Study Area (i.e., north of existing Airport Way) is Urban Industrial, which is derived from the zoning code of Business Park and Industrial Park. The Proposed Action in the northern portion of the Study Area would be consistent with the County land use and zoning policies and plans (see **Figure 3-12** and **Figure 3-13**). **The County land use designation in the southern portion** of the Study Area outside of the City boundary (i.e., south of existing Airport Way) is RCF, which is derived from the zoning code **of Agricultural-10 Acre.** **Figure 3-12**) and on land zoned as Agriculture-10 Acre by the County (see **Figure 3-13**). The <sup>103</sup> **The County zoning code of**

8

*Agriculture-10 Acre does not allow for airports.*<sup>104</sup>

Comment: The plan calls for airport expansion into Ag-10 farmland known as Hanson Slough. Airport use is not allowed in Ag-10.

9

P 3-73 EA

*All FAA actions must avoid floodplains if a practical alternative exists; if no practical alternative exists, actions in a floodplain must be designed to minimize adverse short- and long-term impacts to the floodplain. In addition to federal requirements, state and local floodplain statues apply to development within the floodplain*

#### 3.16.2.1 Significance Threshold

*FAA Order 1050.1F, Exhibit 4-1, defines the FAA's significance threshold for floodplains, which states the action would cause notable adverse impacts on natural and beneficial floodplain values. USDOT Order 5650.2, Floodplain Management and Protection, defines significant*

*encroachment into the floodplain as an encroachment that results in one or more of the following impacts:*

- considerable probability of loss of human life;*
- likely future damage associated with the encroachment that could be substantial in cost or extent, including interruption of service on or loss of a vital transportation facility; or*
- notable adverse impacts on natural and beneficial floodplain values*

Comment: As mentioned before, the obstruction of floodwater conveyance by the re-located Airport Road poses a significant increase in the risk of levee failure. The road obstruction **would cause notable adverse impacts on natural and beneficial floodplain values.** This area has a history of catastrophic levee failures which required rooftop helicopter evacuations and caused millions in damages. Do these public safety impacts and millions in damages not meet the significance threshold defined by USDOT Order 5650.2? The Base Flood Elevation is not the concern. Bypassing the Density Fringe floodplain protections by making the Airport Rd. re-location a public works project **is simply a way to avoid the rules that protect us.**

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P 3-82 EA

*To prevent loss of life, in accordance with FAA criteria, the Airport Sponsor would halt any aircraft movement at the Airport for a major storm or flooding event.*<sup>170, 171</sup> *Additionally, the Proposed Action does not include the addition nor modification of any structures intended for human habitation. As a result, human safety, health, and welfare would not be affected because of implementation or operation of the Proposed Action as the result of climate change. Therefore, the Proposed Action would meet the floodplain resiliency criteria as outlined in the FFRMS.*

Comment: Closing the airport to prevent loss of life during a flood protects airport personnel only. The federally funded airport improvements would be at increased risk of damage

10 because the floodwater conveyance obstruction that threatens our levees affects everyone equally in the floodplain. As I said before, taxpayers will pay for the airport project and then pay again for the flood damage repairs. Expanding an airport into a slough defies common sense.

11 P 3-87 EA  
*As the Study Area is located on the inside of a bend of the Snohomish River and in a flood storage area surrounded by levees as shown in Figure 3-26, the flow direction of the floodplain is not easily discernible for determination of maximum obstruction requirements. As a result, analysis of the floodwater obstruction for airfield improvements of the Proposed Action was analyzed in accordance with the 2018 MP preferred development by considering two primary flow directions: a flow direction perpendicular to the existing levees to represent overtopping of the levees during a flood event, and a flow direction parallel to the direction of flow of the Snohomish River and the portion furthest upstream of the Study Area. To evaluate the obstruction, a cross-section was analyzed perpendicular to each of these potential flow paths.*

*Box culverts are proposed on the southern end of proposed Runway 15/33 as described above to allow the free flow of floodwaters*

Comment: If the levee system made it difficult to discern the maximum obstruction requirements, why were the local levee and floodplain experts not consulted? Where is the input from Snohomish County floodplain hydraulic engineers? Where is input from Marshland Flood Control District, the quasi-governmental agency responsible for flood protection and levee maintenance? Where is the input from FEMA Region 10? Where is the input from the U.S. Army Corps of Engineers who help maintain and repair the levees? Absolutely no mention is made of past levee failures in this area despite many written comments submitted. This is a gross omission for a valid EA.

Past flooding photographs show Hanson Slough filled with 8 to 10 feet of water in every major flood. The EA contained no input from local floodplain hydraulic engineers at Snohomish County. The EA contained no input from local floodplain experts at FEMA Region 10. There was no input from the engineers at the U.S. Army Corps of Engineers. Where is Marshland Flood Control's analysis in the EA? All four of these agencies are experts on our floodplain and they know how our levee system works. The EA is not adequate without input from these four local levee expert agencies. I would like to see all four of these agencies respond to the EA premise that box culverts will solve the problem of floodwater conveyance.

12 P 3-87 EA  
*As described in Section 3.16.2.3, Snohomish County requires that development in the floodplain preserve and protect shoreline natural resources, ecological functions, public health and safety, and natural floodplain processes. Additionally, the County SMP has*

12

**criteria specific for transportation facilities, including avoiding impacts to the surrounding flood control levees**

Comment: Avoiding impacts to the levees is specifically required by Snohomish County. Yet, the EA did not consult any of the local levee experts in our area: Snohomish County Surface Water Department hydraulic engineers, FEMA Region 10, the U.S. Army Corps of Engineers, or Marshland Flood Control District. I would guess the reason for that omission is because you don't ask what you don't want to hear. **An EA that only includes selective input is misleading.**

13

P 3-91 EA

**Two primary water bodies with surface water standards are within or adjacent to the project: *Snohomish River*, to the north and east of the Study Area and *Hanson Slough* in the southern portion of Airport property**

**Comment: The airport expansion and road relocation are being proposed to be placed in a designated body of water.**

14

P 3-10 EA

*A BA was prepared for the Proposed Action (see **Appendix C**). Based on the analysis above, the FAA determined in the BA that the Proposed Action may affect but is not likely to adversely affect Chinook salmon, steelhead, and bull trout and designated critical habitat. Under Section 7 of the ESA, on November 9, 2023, the FAA initiated consultation with the USFWS and NMFS. The results of the consultation will be updated in the Final EA.*

Comment: 17 years ago, DeeAnn Kirkpatrick from NOAA Fisheries, sent the City of Snohomish an email regarding the Harvey Airfield Expansion plan. As DeeAnn said in her email: "...**it is difficult for us to see how this project would not cause "take" of listed Chinook salmon. We are concerned about the loss of floodplain habitat for Chinook during flood flows that is currently provided by the farmland on the airfield property, as well as the habitat provided by Hanson Slough.**"

15

This EA does not adequately address the floodplain consequences of this proposed airport expansion. I urge the FAA to adopt the "No Action Alternative" which allows Harvey Airfield to continue as is.

Sincerely,

Barbara Bailey  
Bailey Farm  
12711 Springhetti Rd.  
Snohomish, WA 98296  
360-568-8826

cc: Snohomish County Executive Dave Somers, Eric Parks, Ken Klein, Michael McCrary, Michael Dobesh, Snohomish County Council, Snohomish City Council, FEMA Region 10, U.S. Army Corps of Engineers, Snohomish County Surface Water, Marshland Flood Control District, Snohomish County Dept. of Emergency Management, Snohomish County Public Works, NOAA Fisheries, U.S. Senator Patty Murray, U.S. Senator Maria Cantwell, U.S. Representative Suzan DelBene, WA Senator John Lovick, WA Rep. April Berg, WA Rep. Brandy Donaghy

## Response to Commenter P-1

1. Section 1.1.3 has been added to the Final EA to document the history of flooding at the Airport. The impacts to the floodplain are discussed in Section 3.16 of the EA. This analysis follows the format and requirements for the NEPA review process identified in FAA Order 1050.1F. As discussed in Section 3.16 of the EA, the Proposed Action is consistent with all floodplain policies and regulations enacted at the federal, state, and county level and does not result in a significant impact as defined by FAA's NEPA implementing requirements.

The comment regarding past funding at the Airport is not correct. The funding for the planning and environmental analysis of the Proposed Action is through the Federal Aviation Administration's (FAA) Airport Improvement Program (AIP). Airports within the National Plan of Integrated Airport Systems (NPIAS) are eligible for AIP funds. Harvey Field is in the NPIAS and, thus, is eligible for AIP funds. Funds obligated for the AIP are drawn from the Airport and Airway Trust fund, which is supported by several aviation-user taxes on such items as airline fares, air freight, and aviation fuel. The past and current AIP grants awarded to Harvey Field do not include taxpayer money from the general fund of the U.S. Treasury.

2. The comment regarding the history of flooding in the surrounding area is noted. Photos and videos of past floods submitted as part of the comment are noted. As the Proposed Action would not modify existing levees, flooding risks associated with levee failure are not evaluated as part of the EA. Section 1.1.3 has been added to the Final EA to provide an overview on flooding history, levees, and flood control improvements in the Study Area. Impacts related to flooding are addressed in Section 3.16.2 in the Final EA. No changes to the levees are proposed under the Proposed Action; therefore, coordination with the U.S. Army Corps of Engineers (USACE) did not occur.
3. Section 3.11.4 in the Final EA describes how the Proposed Action would be compliant with County land use regulations. As stated in that section, the Airport Sponsor has coordinated with the County and will be applying for a Conditional Use Permit (CUP) or Development Agreement (DA) for the southern portion of the Study Area, which is currently zoned as Agriculture-10 Acre, to be consistent with County plans.
4. The comment regarding funding received by the Airport is noted. See the response to Comment #1 of this letter for a discussion on project funding.
5. Sections 3.6.4.2 and 3.16.2.4 in the Final EA have been revised to provide additional discussion regarding Shoreline Conditional Use and Shoreline Variance permits. A coastal consistency determination was submitted and reviewed by the Department of Ecology, which demonstrates no impacts to coastal resources as a result of the Proposed Action. This is presented in Appendix D in the Final EA.

6. The comment regarding the history of flooding in the surrounding area is noted. Impacts related to flooding are addressed in Section 3.16.2 in the Final EA. Section 1.1.3 has been added to the Final EA to provide an overview of flooding history, levees, and flood control improvements in the Study Area. Culverts are proposed along the southern end of the proposed runway and relocated Airport Way along the primary flowpath for the drainage basin for Hanson Slough (see Figure 3-35 in the Final EA). These proposed culverts would allow for the free flow of floodwaters. The location, number of culverts, and culvert sizing based will be determined during final design.
7. The comment regarding the history of flooding in the surrounding area is noted. As the Proposed Action would not modify existing levees, flooding risks associated with levee failure are not evaluated as part of the EA. Section 1.1.3 has been added to the Final EA to provide an overview on flooding history, levees, and flood control improvements in the Study Area. Culverts are proposed along relocated Airport Way along the primary flowpath for the drainage basin for Hanson Slough (see Figure 3-35 in the Final EA). These proposed culverts would allow for the free flow of floodwaters. Appendix I in the Final EA has been revised to include floodplain modeling for the Proposed Action. Floodplain modeling that was inclusive of airfield and roadway improvements indicates that the FEMA-established BFEs would not increase as a result of the Proposed Action for the regulatory 100-year (one percent-annual-chance) flood event. Additional floodplain modeling will be conducted in final design and the Proposed Action will be required to demonstrate that it does not contribute to a cumulative increase in Base Flood Elevations (BFEs) that exceeds the limits prescribed in the Snohomish County Code 30.65 to obtain the County Flood Hazard Permit. All of the above represent efforts to mitigate impacts to the floodplain and demonstrate compliance with the County's density fringe floodplain development criteria.
8. See response to Comment #3 for a discussion on land use and zoning.
9. See response to comment #7 for discussion of floodplain modeling and proposed culverts underneath relocated Airport Way. As the Proposed Action would not modify existing levees, flooding risks associated with levee failure are not evaluated as part of the EA. In flooding events greater than the 5-year (20% annual chance) flood event, which would result in levee overtopping, Harvey property, including Hanson Slough, becomes one effective storage area designated as Storage Area #9 (see Figure 3-26 in the Final EA). Sections 3.16.2.3 and 3.16.2.4 in the Final EA have been revised to discuss floodplain natural and beneficial floodplain values as established by United States Department of Transportation (USDOT) Order 5650.2 and how the Proposed Action would not cause notable impacts to these floodplain values in various resource categories. As such, the FAA has determined that the floodplain encroachment would not constitute significant floodplain encroachment under USDOT Order 5650.2 nor would the Proposed Action exceed the significance threshold for floodplains under FAA Order 1050.1F.

10. See response to comment #7 for discussion of floodplain modeling. The commenter's statement regarding flooding events is noted. Section 1.1.3 has been added to the Final EA to provide an overview of flooding history, levees, and flood control improvements in the Study Area. However, losses, impacts to human safety, health, and welfare would not be affected by the Proposed Action. As described in Section 3.16, the Proposed Action meets all regulatory floodplain criteria.
11. Section 1.1.3 has been added to the Final EA to provide an overview of flooding history, levees, and flood control improvements in the Study Area. No changes to the levees are proposed under the Proposed Action; therefore, coordination with the USACE was not conducted. The final design of the Proposed Action, to include culverts underneath the proposed runway and relocation of Airport Way, will be coordinated with the County and additional floodplain hydraulic modeling will be conducted in final design. In conjunction with the County Flood Hazard Permit, a Habitat Assessment and Mitigation Plan would be completed during final design and submitted to Snohomish County in accordance with FEMA Region 10 guidance. Because criteria from FEMA Region 10 is outlined in the Habitat Assessment and Mitigation Plan, additional coordination with FEMA Region 10 was not conducted as part of the EA process. Appendix I in the Final EA has been revised to include floodplain modeling for the Proposed Action. Floodplain modeling that was inclusive of airfield and roadway improvements indicates that the FEMA-established BFEs would not increase as a result of the Proposed Action for the regulatory 100-year (one percent-annual-chance) flood event. Marshland Flood Control District was involved in scoping and submitted comments on the Draft EA and are discussed in Sections 3.16.2 and 3.16.3 in the Final EA. See responses to Commenters A-3, A-4, and A-5 for input from Marshland Flood Control District.
12. No changes to the levees are proposed under the Proposed Action; therefore, coordination with the USACE was not conducted. Proposed stormwater improvements would adhere to criteria outlined the Snohomish County Drainage Manual, published by Snohomish County Surface Water Management. Therefore, additional coordination with County Surface Water Management was not conducted as part of the EA process. Coordination with County Surface Water Management will occur during final design as part of the permitting process. In conjunction with the County Flood Hazard Permit, a Habitat Assessment and Mitigation Plan would be completed during final design and submitted to Snohomish County in accordance with FEMA Region 10 guidance. Because criteria from FEMA Region 10 is outlined in the Habitat Assessment and Mitigation Plan, additional coordination with FEMA Region 10 was not conducted as part of the EA process. Sections 3.16.2.3 and 3.16.2.4 in the Final EA have been revised discussing floodplain natural and beneficial floodplain values as established by United States Department of Transportation (USDOT) Order 5650.2 and how the Proposed Action would not cause notable impacts to these floodplain values in various resource categories. As such, the FAA has determined that the floodplain encroachment would not constitute significant floodplain encroachment under USDOT Order 5650.2 nor would the Proposed Action exceed the significance threshold for floodplains under FAA Order 1050.1F. Marshland Flood Control District was involved in scoping and public comments

and the District is discussed in Sections 3.16.2 and 3.16.3 in the Final EA. See responses to Commenters A-3, A-4, and A-5 for input from Marshland Flood Control District.

13. A portion of the Proposed Action would occur in Hanson Slough. Hanson Slough has applicable water quality standards established by the Department of Ecology as it is listed as having a reservoir detaining water for more than 15 days annually, which generally consistent with the definition of a slough. Culverts are proposed beneath relocated Airport Way along the primary flowpath for the drainage basin for Hanson Slough (see Figure 3-35 in the Final EA). These proposed culverts would minimize impacts to drainage for runoff and floodwaters. The location, number of culverts, and culvert sizing would be completed in final design. Furthermore, the impact of the proposed road on the overflow path was evaluated as part of this EA, which showed the Proposed Action resulting in no increase in the 100-year (1% annual chance) BFE. Impacts related to Hanson Slough are discussed in Section 3.16 in the Final EA.
14. Section 7 consultation with the National Marine Fisheries Service (NMFS)/U.S. Fish and Wildlife Service (USFWS) was ongoing at the time of the Draft EA publication. The USFWS issued a Letter of Concurrence on October 2, 2024, for the effects on bull trout and designated critical habitat (see Appendix C in the Final EA). However, NMFS held that the Proposed Action is likely to adversely affect Endangered Species Act (ESA)-listed salmonids, their critical habitat, and essential fish habitat for Pacific Coast salmon due to the effects from the pollutant 6PPD, and thus required formal consultation. Therefore, a revised BA was prepared and submitted to NMFS on September 5, 2024, with an adverse effect determination (see “NMFS Consultation” in Appendix C in the Final EA). NMFS issued their Biological Opinion on June 26, 2025, and is summarized in Section 3.4.4 in the Final EA. Section 3.4.3.2 in the Final EA discusses the existing habitat for salmonids. Appendix C in the Final EA has been updated with the results of the consultation with these agencies.
15. The commenter’s preference for the No Action Alternative is noted. See responses to Comments #5, #9, #10, and #11 of this letter for discussion on how the Proposed Action would be in compliance with relevant floodplain regulations.

## Commenter P-2

**From:** [Morgan Davis](#)  
**To:** [windchimehouse@comcast.net](mailto:windchimehouse@comcast.net); [Barrow, Julie](#)  
**Cc:** [Ron Steingold](#); [kwright@rockisland.com](mailto:kwright@rockisland.com); [Michael Whitney](#); [Sophia Gates](#); [Janice Podsada](#); [newstips@heraldnet.com](mailto:newstips@heraldnet.com); [Tom Merrill \(council\)](#); [Karen Guzak \(Council\)](#); [Maygen Hetherington \(Council\)](#); [David Flynn \(Council\)](#); [Judith Kuleta \(Council\)](#); [Lea Anne Burke \(Council\)](#); [Felix Neals \(Council\)](#); [Merritt Weese](#); [Christine Wakefield-Nichols](#); [Nick Gottuso](#); [Mitch Cornelison](#); [hank eskridge](#); [Terry lippincott](#); [Brooke Eidem](#); [Nova Heaton](#); [Heather Thomas](#); [Linda Redmon \(council\)](#)  
**Subject:** Re: Sample Argument with Historical Docs Against Airport Expansion/Improvements - This single letter tells the whole story of the floodplain.  
**Date:** Saturday, May 4, 2024 5:52:28 PM

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Thank you Beth for forwarding this to me, an excellent letter of arguments against expanding the Harvey Airport runway into Hanson Slough and rerouting Airport Way.

1 During the April 16th City of Snohomish Council meeting, Lisa Lefeber, CEO of the Port of Everett, pitched a new tax on Snohomish residents and used Harvey Field's expansion plan as a desirable justification and goal. She even mentioned that if the tax passed, the Army Corps of Engineers stands ready, willing, and able to provide thousands of truckloads of clean fill from dredging the Snohomish River to fill-in Hanson Slough.

2 I just learned Dave Somers was appointed by the Port of Everett to be on the "pro" committee to write the arguments supporting Lisa's pitch for a new tax on Snohomish residents. Naturally, as county executive in charge of Paine Field, his agenda is to make Paine Field into another Sea-Tac North International Airport, thus requiring the offload of General Aircraft to Harvey Field and the Arlington Airport that Lisa advocated in her presentation. I must conclude, Dave Somers is now a renegade environmentalist, more interested in profits for the Harveys and "growth for growth's sake".

Morgan Davis, longtime Snohomish resident and witness to dozens of major floods of the Snohomish River into the Snohomish River Valley and even into the city of Snohomish along First Street.

On Sat, May 4, 2024 at 2:48 PM <[windchimehouse@comcast.net](mailto:windchimehouse@comcast.net)> wrote:

Concerned Neighbors,

I have permission to share this with you.

Our hope is to generate more letters to more government officials.

Remember, when officials receive letters, that letter represents 1000 people.

Never doubt the power of your individual words.

PS It's time to print copies and share emails. We need to grow our email list. Please consider helping me with this project. Contact me directly if someone wants to join us.

Thanks,

Beth

----- Forwarded message -----

From: **Barb Bailey** <[barbarabailey55@gmail.com](mailto:barbarabailey55@gmail.com)>

Date: Sat, May 4, 2024 at 11:11 AM

Subject:

To: <[dave.somers@co.snohomish.wa.us](mailto:dave.somers@co.snohomish.wa.us)>, <[Eric.Parks@co.snohomish.wa.us](mailto:Eric.Parks@co.snohomish.wa.us)>, <[ken.klein@snoco.org](mailto:ken.klein@snoco.org)>, <[m.mcrary@snoco.org](mailto:m.mcrary@snoco.org)>, <[michael.dobesh@snoco.org](mailto:michael.dobesh@snoco.org)>, <[Sam.Low@snoco.org](mailto:Sam.Low@snoco.org)>, <[jared.mead@snoco.org](mailto:jared.mead@snoco.org)>, Dunn, Megan <[Megan.Dunn@co.snohomish.wa.us](mailto:Megan.Dunn@co.snohomish.wa.us)>, <[nate.nehring@snoco.org](mailto:nate.nehring@snoco.org)>, <[strom.peterson@snoco.org](mailto:strom.peterson@snoco.org)>, Linda Redmon (Mayor) <[redmon@snohomishwa.gov](mailto:redmon@snohomishwa.gov)>, <[kuleta@snohomishwa.gov](mailto:kuleta@snohomishwa.gov)>, <[neals@snohomishwa.gov](mailto:neals@snohomishwa.gov)>, <[merrill@snohomishwa.gov](mailto:merrill@snohomishwa.gov)>, <[flynn@snohomishwa.gov](mailto:flynn@snohomishwa.gov)>, <[l.burke@snohomishwa.gov](mailto:l.burke@snohomishwa.gov)>, <[guzak@snohomishwa.gov](mailto:guzak@snohomishwa.gov)>, <[eidem@snohomishwa.gov](mailto:eidem@snohomishwa.gov)>, <[hetherington@snohomishwa.gov](mailto:hetherington@snohomishwa.gov)>, Van Hoff, Scott <[scott.vanhoff@fema.dhs.gov](mailto:scott.vanhoff@fema.dhs.gov)>, <[michelle.walker@usace.army.mil](mailto:michelle.walker@usace.army.mil)>, <[charles.h.iffit@usace.army.mil](mailto:charles.h.iffit@usace.army.mil)>, <[douglas.t.weber@usace.army.mil](mailto:douglas.t.weber@usace.army.mil)>, <[erik.stockdale@co.snohomish.wa.us](mailto:erik.stockdale@co.snohomish.wa.us)>, Marshland Flood Control <[Marshlandfloodcontrol@gmail.com](mailto:Marshlandfloodcontrol@gmail.com)>, <[lucia.schmit@snoco.org](mailto:lucia.schmit@snoco.org)>, <[dara.salmon@snoco.org](mailto:dara.salmon@snoco.org)>, <[dara.salmon@snoco.org](mailto:dara.salmon@snoco.org)>, <[kelly.snyder@co.snohomish.wa.us](mailto:kelly.snyder@co.snohomish.wa.us)>, <[dmccormick@snoco.org](mailto:dmccormick@snoco.org)>, <[donald.hubner@noaa.gov](mailto:donald.hubner@noaa.gov)> <[donald.hubner@noaa.gov](mailto:donald.hubner@noaa.gov)>, <[kim.kratz@noaa.gov](mailto:kim.kratz@noaa.gov)>, <[ryan\\_mcreynolds@fws.gov](mailto:ryan_mcreynolds@fws.gov)>, <[casework@murray.senate.gov](mailto:casework@murray.senate.gov)>, <[suzan.delbene@mail.house.gov](mailto:suzan.delbene@mail.house.gov)>, <[maria@cantwell.senate.gov](mailto:maria@cantwell.senate.gov)>, <[mike\\_spahn@murray.senate.gov](mailto:mike_spahn@murray.senate.gov)> <[mike\\_spahn@murray.senate.gov](mailto:mike_spahn@murray.senate.gov)>, <[jami\\_burgess@cantwell.senate.gov](mailto:jami_burgess@cantwell.senate.gov)>, <[john.lovick@leg.wa.gov](mailto:john.lovick@leg.wa.gov)>, Ibrahimovic, Semir <[Semir.Ibrahimovic@leg.wa.gov](mailto:Semir.Ibrahimovic@leg.wa.gov)>, <[April.Berg@leg.wa.gov](mailto:April.Berg@leg.wa.gov)>, <[brandy.donaghy@leg.wa.gov](mailto:brandy.donaghy@leg.wa.gov)>, <[julie.barrow@rsandh.com](mailto:julie.barrow@rsandh.com)>, <[cyndyh@harveyfield.com](mailto:cyndyh@harveyfield.com)>

May 3, 2024

Re: Harvey Airfield Expansion Draft EA

To Julie Barrow, RS&H

Harvey Airfield has been trying to expand the airport further into the floodplain for over 20 years despite consistent opposition from the community and the local elected officials at the County, State, City, and flood control district levels. Privately owned Harvey Airfield has run a successful business with the current runway configuration over the past 80 years. I understand the airport does not like the current limitations they face, but for this plan to move forward, federal, state, and county floodplain protections will have to be circumvented. These floodplain development policies protect the life and property of floodplain residents as well as the public roads and infrastructure we all use. All residents and businesses in the floodplain face limitations. Harvey Airfield should be no different.

These airport master plan updates sponsored by Harvey Field are coming at huge taxpayer expense. According to the FAA website, Harvey Field received \$2,439, 077.00 in 2021 for this latest plan. We the taxpayers are funding the studies and we the taxpayers will fund the construction cost of the project benefitting the airport owner. And then we the taxpayers will fund the cost of flood damage repair.

As far as an Environmental Assessment, I believe a brief look at the history of frequent and severe flooding in this area should have halted further discussion many years ago. We locals all know how badly it floods around here and we all know it is going to keep

flooding.

I am hoping that my flood photographs, newspaper stories, and home video recordings taken over the years documenting our flood history will be taken into consideration by the powers that be.

My husband and I live on a 5<sup>th</sup> generation family farm about a mile south of Harvey Airfield. All of us in the Snohomish River Valley have experienced frequent and severe flooding over the past 50 plus years. This includes Harvey Airfield. The proposed airport expansion into the low-lying floodplain known as Hanson Slough is very concerning. We believe this development would significantly and possibly catastrophically increase the flood hazard for all of us sharing this floodplain.

The Snohomish River lies just east of Harvey Airfield. When it floods, the water flows over the levee and then under the railroad trestle 12 ft. openings into Hanson Slough, the area designated for airport expansion. The plan includes re-routing Airport Road along the eastern edge of Hanson Slough. The floodwater flow under the 12 ft. railroad trestle would be blocked by the re-routed Airport Road. This blockage would increase the upstream water levels, thus threatening the neighbors to the south. Hanson Slough is critical to floodwater conveyance. Obstruction of floodwater conveyance is what causes our levees to fail. Levee failure in our area has a well-documented history of catastrophic consequences.

I do not believe the history of frequent and severe flooding in this area was addressed in the EA even though many comments were received from the public. No mention is made of past levee failures. No mention is made of the millions in damages and life-threatening conditions that past Snohomish River floods in this area have caused. No mention is made of the past flood damages at Harvey Field, especially the levee break in 1990 that destroyed airplane hangers and left airport offices flooded in several feet of water.

As Kandace Harvey said in the 11/29/1990 edition of the Everett Herald: *"I can't believe it", Kandace Harvey said as she took in the damage receding flood waters had just revealed, her expression a marriage of pain and awe. "It's (the damage) so much worse than we ever anticipated. It's like an explosion hit". ...In the building she had just left were computer and communications systems that would never work again ruined furniture and a kitchen recently remodeled...that looked like it had been hit by a tornado."*

I am including a 1990 photo of a helicopter rescue at Airport Rd. bordering Harvey Field. I am including a 1990 photo of a home knocked off it's foundation on Airport Rd. bordering Harvey Field. I am including a 1990 photo of the Airport Rd. washout bordering Harvey Field. I am including a 1990 photo of Springhetti Rd. flood damage bordering the south side of Hanson Slough at what is now Big Trees nursery. I am including a 1990 photo of Springhetti Rd. flooding and damage a mile south of Harvey Field at our farm.

I am including flood photos from 1975, 1990, 1995, 2006, and 2009 showing the 8 to 10 feet of floodwater in Hanson Slough and flooding in and around Harvey Airfield. Once again, I would like to emphasize that this area has a history of frequent and severe flooding with catastrophic consequences. Where is that documented in the EA? It is not even mentioned. Following is a 2006 home video following the Election Day Flood showing Harvey Airfield and the proposed area for expansion into Hanson Slough:

<https://www.dropbox.com/scl/fi/id656upw7rtma8fnj30wy/2006-flood-at-Harvey-Field-Hanson-Slough.mp4?rlkey=ecqmxeuys2wfwzud8cr5uptqs&dl=0>

The 11/26/1990 Everett Herald article quotes Ron Knutsen who was with his parents on 111<sup>th</sup> St. which borders the southern edge of Hanson Slough. *"It was the closest to death I've ever been in my life," Ron Knutsen of Snohomish said after watching the levee near his parents' farm break. "The whole dike exploded like Mount St. Helens. Then it was kind of like the Snohomish River was aimed at our house." Knutsen said he had barely enough time to grab a ladder and his father's heart medicine, call 911 and scramble with his parents to the roof before the house began to shake. "You say your prayers," he said. The Knutsens were among more than two dozen farm residents near Snohomish who were rescued by helicopter Sunday.* Here is a 1990 home video I took when we walked along 111<sup>th</sup> St. after the flood showing the Knutsen house knocked off its foundation.

<https://www.dropbox.com/scl/fi/2rbfx98crptcka6s742ox/1990-flood-damages-111th-St.-just-S.-of-Hanson-Slough.mp4?rlkey=y1vz7kifyo17s2axd3cwtf793&dl=0>

Another article in the 11/26/1990 Everett Herald quotes my husband: *"It was like a tidal wave," Snohomish farmer Don Bailey said after a dike holding back the rain gorged Snohomish River broke near his family's 60-year old house. "It filled the whole valley."* Our farm is located in the center bottom of the EA Figure 3-26 Flood Storage Areas. Following is the 1990 flood view looking north towards Harvey Airfield. The floodwater filled the entire valley across Hwy 9 to the bottom of Seattle Hill.

<https://www.dropbox.com/scl/fi/4ob56saakf8hpoaiot1hd/1990-1126-flood-view-from-Bailey-Farm.mp4?rlkey=55a7nbazpapi609qoxfvlrkr&dl=0>

In 2007, The 21 member Coordinated Diking Council submitted a letter of opposition to the Harvey Airfield expansion plan. As the Chairman of the CDC, Barney Bagwell wrote:

*"The Coordinated Diking Council, whose members comprise the elected Commissioners of Snohomish River Valley, diking, drainage, and flood control districts, stand united in our opposition to the proposed landfill required for the Harvey Airfield expansion plan.*

*The proposed fill is diametric to the goals and purpose of the Snohomish River Comprehensive Flood Control Management Plan developed jointly by Snohomish County Surface Water Management and the CDC membership and adopted by the Snohomish County Council.*

*The wisdom of that plan was clearly demonstrated by the Election Day Flood of November 2006 when the Snohomish River Valley endured a near-record flood and no levees were breached. The Harvey fill proposal threatens to destroy the parity created by the comprehensive plan."*

The multi-generational families living in the Snohomish River floodplain know and respect the power of the flooding Snohomish River better than any outside consultant who can selectively manipulate data to come up with whatever result they are being paid for. A site visit to Hanson Slough in June is much different than what Hanson Slough looks like in every major flood event, a body of water filled with 8 to 10 feet of water.

The local experts on our floodplain are the hydraulic engineers who work for Snohomish County's Surface Water Department. They know how our levee system works and they are familiar with the history of catastrophic levee failure in this area. Consultation with Snohomish County Surface Water Management Department should be a requirement of the EA.

As Snohomish County hydraulic engineer, Vaughn Collins said right before the Nov. 2006 flood, *"If the forecast holds, the Snohomish River Valley will look like a giant lake. It will flood deeper than it's ever been flooded before."* The Everett Herald article goes on to say: *Experts fear the floodwater may punch through the system of dikes and levees that protect thousands of acres of fertile farmland, at least three major highways and the homes of nearly 25,000 people. "The levees and dikes will be under 'tremendous pressure' "* (Vaughn) Collins said.

Here is what the 1990 levee breach at Tim Stocker's farm bordering our farm looked like:

<https://www.dropbox.com/scl/fi/7lkfz2wziwajthlfdtsgq/1990-1128-levee-break-at-Tim-Stocker.mp4?rlkey=vpf68p31plbdtbbidqizns96w&dl=0>

In the "Why It Wasn't Worse" Everett Herald article after the November 2006 flood, the coordinated levee system was credited with **preventing** catastrophic losses. *Experts believed the coordinated flood-protection system would work more like a pressure-release valve, bleeding off the river's energy when the water got too high. And 16 years later, it worked perfectly, said Vaughn Collins, hydraulic engineer for Snohomish County.* This coordinated levee system would be compromised by the Harvey Airfield floodplain obstruction at Hanson Slough.

Snohomish County's Department of Emergency Management (DEM) is also very familiar with the flood history in our area. They are responsible for the evacuation and rescue operations during a flood. According to the DEM website: *"Flood – More than 75,000 people in Snohomish County live and work in places where potentially devastating flood occur. Historically, the major river basins – the Snohomish and Stillaguamish – have flooded every three to five years, often at the same time. Since 1962, the county has weathered 18 floods large enough to be Presidentially declared disasters. The worst arrived during winter 1975, causing \$42 million damage and the deaths of 3,500 head of livestock."* Snohomish County DEM would be a valuable resource when analyzing the flooding consequences of the proposed airport expansion. Consultation with Snohomish County DEM should be a requirement of the EA.

FEMA Region 10 is the federal expert for our floodplain. FEMA helps fund levee improvements in our area. FEMA also helps pay for levee restoration when levees fail. Consultation with FEMA Region 10 should be a requirement of the EA.

The U.S. Army Corps of Engineers is called into action when our levees are breached. They also fund and repair faulty sections of our levees. These engineers know our levee system well. Consultation with the U.S.A.C.E. should be a requirement of the EA.

Following are my specific comments on the EA. Excerpts from the EA are in red.

#### P 1-1 EA

##### *1.1 Airport Overview*

*The Airport is about one mile south of the City of Snohomish's Central Business District and is part of the County's Urban Growth Area (UGA), **Figure 1-2** shows Airport property as well as additional land that the Airport Sponsor owns around the Airport (i.e., Harvey Property), including a parcel of land to the north across the Burlington Northern Santa Fe (BNSF) railroad tracks, which encourages urban growth within this area.<sup>23</sup> The Airport Sponsor owns 208 acres, of which, 87 acres is Airport property. The original runway was first constructed in 1945 at what was known as Snohomish Airfield, Inc., along with hangars, a motel, and the fueling area. Additional structures, including the administration building, maintenance shop, and restaurant were added in 1947.<sup>4</sup>*

Comment: All the airport property is in the Density Fringe floodplain designation which limits floodplain development activity. All current airport operations are in the Snohomish UGA. The low-lying farmland where the runway relocation would go to the south, commonly known as Hanson Slough is not in the UGA. Airport use is allowed only in the UGA Density Fringe, but not into Hanson Slough which is outside the UGA.

#### P 1-5 EA

*The asphalt pavement surface for Runway 15L/33R was rehabilitated in 2021 due to cracking, weathering, rutting, and depressions in the pavement*

Comment: The Airport proposal would destroy the existing runway which just received a 1.1 million dollar taxpayer funded reconstruction.

According to the FAA website, Harvey Airfield received the following funding:

2014: \$549,920 – to update Airport Master Plan Study and Wildlife Hazard Assessments

2020: \$166,666 – for runway rehabilitation

2021: \$1,101,380 - to reconstruct runway

2021: \$2,439,077 – to conduct Airport Environmental Assessment Plan/Study

2021: \$23,000 – CRRSA (Coronavirus Response & Relief Supplemental Appropriation Act)

2021: \$59,000 – ARPA (American Rescue Plan Act of 2021)

Comment: In the last 10 years Harvey Airfield has received over 4 million dollars.

#### P 1-20 EA

*About 3.3 acres of fill that meets FAA specifications would be needed for the airfield project components, and about 6.0 acres of fill that meets FAA specifications would be needed for the roadway relocation.<sup>38</sup>*

Comment: This project would require 9.3 acres of fill in the floodplain. How do you reconcile that large amount of fill with the floodplain protections provided by the Shoreline Management Program outlined below in the EA? The area where the runway and road relocation would occur in Hanson Slough is not in the Urban Shoreline. The Shoreline Management Program protects floodplains and Resource lands. Hanson Slough is both.

#### P 3-80 EA

<sup>16</sup>

Table 3-17 Shoreline Development Requirements

##### **Floodplains<sup>164</sup>**

*Preserve and protect ecological functions and processes necessary to maintain shoreline natural resources, protect public health and safety, and preserve beneficial uses of the shoreline.*

*Preserve and protect the ecological functions and values of the County's shoreline areas to ensure no net loss.*

*Protect natural floodplain processes where feasible.*

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##### **Transportation Facilities<sup>165</sup>**

*Locate and design transportation systems to minimize the disruption of natural habitat, floodplains, wetlands, geologically hazardous areas, resource lands, and other elements of environmentally sensitive areas. Where disruption cannot be avoided, designs shall minimize the disruption and impacts shall be mitigated.*

*Locate and design new and expanded transportation facilities to avoid the need for structural shoreline stabilization within a channel migration zone or floodway.*

*Locate and design transportation facilities to avoid or minimize impacts to shoreline ecological functions, especially channel migration and conveyance of flood waters and large woody debris.*

*Design and locate new and expanded transportation facilities away from shoreline areas to ensure no net loss of shoreline ecological functions, preserve the natural landscape, and minimize*

*conflicts with existing and planned uses.*

Comment: As mentioned before, this frequently flooded area has a history of severe and catastrophic floods. Altering the conveyance of floodwaters here increases the risk to public health and safety.

## P 3-13 EA

### 3.6 Coastal Resources

*The Coastal Barrier Resources Act, Coastal Zone Management Act, and National Marine Sanctuaries Act are the primary regulations that protect coastal resources. According to FAA Order 1050.1F coastal resources include all natural resources occurring within coastal waters and their adjacent shorelands such as islands, transitional and intertidal areas, salt marshes, wetlands, floodplains, estuaries, beaches, dunes, barrier islands, coral reefs, fish and wildlife, and their respective habitats. The coastlines of the Atlantic Ocean, Pacific Ocean, Great Lakes, and Gulf of Mexico are all coastal resources.*

#### 3.6.1 Significance Threshold

*The FAA has not established a significance threshold for coastal resources however, the FAA has identified factors to consider when evaluating the context and intensity of potential environmental impacts on coastal resources Factors to consider that may be applicable to*

*coastal resources include, but are not limited to, situations in which the proposed action or alternative(s) would have the potential to:*

- Be inconsistent with the relevant state coastal zone management plan(s);*
- Impact a coastal barrier resources system unit (and the degree to which the resource would be impacted);*
- Pose an impact to coral reef ecosystems (and the degree to which the ecosystem would be affected);*
- Cause an unacceptable risk to human safety or property; or*
- Cause adverse impacts to the coastal environment that cannot be satisfactorily mitigated.*

Comment: As mentioned before, the blockage of floodwater conveyance by relocating Airport Rd puts additional pressure on our levee system. This area has a long history of frequent and severe flooding and levee failures with life threatening consequences as well as significant personal property damage and damage to County and State roads, water, fiber optic, telephone, and power lines. Following is a 1990 home video showing the damage to

Springhetti Rd. bordering the south side of Hanson Slough

<https://www.dropbox.com/sc/1fi/ed4hcnsb92c25b1ywy4gu/1990-Springhetti-Rd-bordering-S.-side-of-Hanson-Slough.mp4?rlkey=elzbyd9l6bu4bo0prj046lmj4&dl=0>

P 3-37 EA

*The County land use designation in the northern portion of the Study Area (i.e., north of existing Airport Way) is Urban Industrial, which is derived from the zoning code of Business Park and Industrial Park. The Proposed Action in the northern portion of the Study Area would be consistent with the County land use and zoning policies and plans (see **Figure 3-12** and **Figure 3-13**). The County land use designation in the southern portion of the Study Area outside of the City boundary (i.e., south of existing Airport Way) is RCF, which is derived from the zoning code of **Agriculture-10 Acre**. **Figure 3-12** and on land zoned as Agriculture-10 Acre by the County (see **Figure 3-13**). The <sup>103</sup>County zoning code of Agriculture-10 Acre does not allow for airports.<sup>104</sup>*

Comment: The plan calls for airport expansion into Ag-10 farmland known as Hanson Slough. Airport use is not allowed in Ag-10.

P 3-73 EA

*All FAA actions must avoid floodplains if a practical alternative exists; if no practical alternative exists, actions in a floodplain must be designed to minimize adverse short- and long-term impacts to the floodplain. In addition to federal requirements, state and local floodplain statutes apply to development within the floodplain*

#### 3.16.2.1 Significance Threshold

*FAA Order 1050.1F, Exhibit 4-1, defines the FAA's significance threshold for floodplains, which states the action would cause notable adverse impacts on natural and beneficial floodplain values. USDOT Order 5650.2, Floodplain Management and Protection, defines significant encroachment into the floodplain as an encroachment that results in one or more of the following impacts:*

- *considerable probability of **loss of human life**;*
- ***likely future damage associated with the encroachment that could be substantial in cost or extent**, including interruption of service on or loss of a vital transportation facility; or*
- ***notable adverse impacts on natural and beneficial floodplain values***

Comment: As mentioned before, the obstruction of floodwater conveyance by the re-located Airport Road poses a significant increase in the risk of levee failure. The road

obstruction **would cause notable adverse impacts on natural and beneficial floodplain values**. This area has a history of catastrophic levee failures which required rooftop helicopter evacuations and caused millions in damages. Do these public safety impacts and millions in damages not meet the significance threshold defined by USDOT Order 5650.2? The Base Flood Elevation is not the concern. Bypassing the Density Fringe floodplain protections by making the Airport Rd. relocation a public works project **is simply a way to avoid the rules that protect us**.

#### P 3-82 EA

*To prevent loss of life, in accordance with FAA criteria, the Airport Sponsor would halt any aircraft movement at the Airport for a major storm or flooding event.<sup>170, 171</sup> Additionally, the Proposed Action does not include the addition nor modification of any structures intended for human habitation. As a result, human safety, health, and welfare would not be affected because of implementation or operation of the Proposed Action as the result of climate change. Therefore, the Proposed Action would meet the floodplain resiliency criteria as outlined in the FFRMS.*

Comment: Closing the airport to prevent loss of life during a flood protects airport personnel only. The federally funded airport improvements would be at increased risk of damage because the floodwater conveyance obstruction that threatens our levees affects everyone equally in the floodplain. As I said before, taxpayers will pay for the airport project and then pay again for the flood damage repairs. Expanding an airport into a slough defies common sense.

#### P 3-87 EA

*As the Study Area is located on the inside of a bend of the Snohomish River and in a flood storage area **surrounded by levees** as shown in **Figure 3-26**, the **flow direction of the floodplain is not easily discernible for determination of maximum obstruction requirements**. As a result, analysis of the floodwater obstruction for airfield improvements of the Proposed Action was analyzed in accordance with the 2018 MP preferred development by considering two primary flow directions: a flow direction perpendicular to the existing levees to represent overtopping of the levees during a flood event, and a flow direction parallel to the direction of flow of the Snohomish River and the portion furthest upstream of the Study Area. To evaluate the obstruction, a cross-section was analyzed perpendicular to each of these potential flow paths.*

**Box culverts are proposed on the southern end of proposed Runway 15/33 as described above to allow the free flow of floodwaters**

Comment: If the levee system made it difficult to discern the maximum obstruction requirements, **why were the local levee and floodplain experts not consulted?** Where is the input from Snohomish County floodplain hydraulic engineers? Where is input from Marshland Flood Control District, the quasi-governmental agency responsible for

flood protection and levee maintenance? Where is the input from FEMA Region 10? Where is the input from the U.S. Army Corps of Engineers who help maintain and repair the levees? Absolutely no mention is made of past levee failures in this area despite many written comments submitted. **This is a gross omission for a valid EA.**

Past flooding photographs show Hanson Slough filled with 8 to 10 feet of water in every major flood. The EA contained no input from local floodplain hydraulic engineers at Snohomish County. The EA contained no input from local floodplain experts at FEMA Region 10. There was no input from the engineers at the U.S. Army Corps of Engineers. Where is Marshland Flood Control's analysis in the EA? All four of these agencies are experts on our floodplain and they know how our levee system works. The EA is not adequate without input from these four local levee expert agencies. I would like to see all four of these agencies respond to the EA premise that box culverts will solve the problem of floodwater conveyance.

#### P 3-87 EA

***As described in Section 3.16.2.3, Snohomish County requires that development in the floodplain preserve and protect shoreline natural resources, ecological functions, public health and safety, and natural floodplain processes. Additionally, the County SMP has criteria specific for transportation facilities, including avoiding impacts to the surrounding flood control levees***

Comment: Avoiding impacts to the levees is specifically required by Snohomish County. Yet, the EA did not consult any of the local levee experts in our area: Snohomish County Surface Water Department hydraulic engineers, FEMA Region 10, the U.S. Army Corps of Engineers, or Marshland Flood Control District. I would guess the reason for that omission is because you don't ask what you don't want to hear. **An EA that only includes selective input is misleading.**

#### P 3-91 EA

***Two primary water bodies with surface water standards are within or adjacent to the project: Snohomish River, to the north and east of the Study Area and Hanson Slough in the southern portion of Airport property***

**Comment: The airport expansion and road relocation are being proposed to be placed in a designated body of water.**

P 3-10 EA

*A BA was prepared for the Proposed Action (see **Appendix C**). Based on the analysis above, the FAA determined in the BA that the Proposed Action may affect but is not likely to adversely affect Chinook salmon, steelhead, and bull trout and designated critical habitat. Under Section 7 of the ESA, on November 9, 2023, the FAA initiated consultation with the USFWS and NMFS. The results of the consultation will be updated in the Final EA.*

Comment: 17 years ago, DeeAnn Kirkpatrick from NOAA Fisheries, sent the City of Snohomish an email regarding the Harvey Airfield Expansion plan. As DeeAnn said in her email: "...it is difficult for us to see how this project would not cause "take" of listed Chinook salmon. We are concerned about the loss of floodplain habitat for Chinook during flood flows that is currently provided by the farmland on the airfield property, as well as the habitat provided by Hanson Slough."

This EA does not adequately address the floodplain consequences of this proposed airport expansion. I urge the FAA to adopt the "No Action Alternative" which allows Harvey Airfield to continue as is.

Sincerely,

Barbara Bailey  
Bailey Farm  
12711 Springhetti Rd.  
Snohomish, WA 98296  
360-568-8826

cc: Snohomish County Executive Dave Somers, Eric Parks, Ken Klein, Michael McCrary, Michael Dobesh, Snohomish County Council, Snohomish City Council, FEMA Region 10, U.S. Army Corps of Engineers, Snohomish County Surface Water, Marshland Flood Control District, Snohomish County Dept. of Emergency Management, Snohomish County Public Works, NOAA Fisheries, U.S. Senator Patty Murray, U.S. Senator Maria Cantwell, U.S. Representative Suzan DelBene, WA Senator John Lovick, WA Rep. April Berg, WA Rep. Brandy Donaghy

## Response to Commenter P-2

1. The comment regarding a tax on Snohomish residents and fill on Hanson Slough is noted.
2. The comment regarding expanding Paine Field is noted.

## Commenter P-3

**From:** [Cyndy Hendrickson](#)  
**To:** [Barrow, Julie](#)  
**Cc:** [Kandace Harvey](#)  
**Subject:** FW: Draft EA comment - Edwards - Springhetti Rd  
**Date:** Thursday, May 9, 2024 9:17:38 AM

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**From:** Michael D. Edwards <michael\_d\_edwards@hotmail.com>  
**Sent:** Thursday, May 09, 2024 7:20 AM  
**To:** Cyndy Hendrickson <cyndyh@harveyfield.com>  
**Subject:** RE: Draft EA comment - Edwards - Springhetti Rd

May I please add an additional comment? I realized last night that I left off some of the most important joy I receive.

---

**1** My final comment regards the Snohomish Flying Service and Skydive Snohomish.

I understand on the order of 400 pilots per month receive flight training at Harvey Field. This activity provides a consistent stream of students, instructors, and staff to our community. Their presence improves economic activity in our town and provides much needed revenue to Harvey Field with multiplier effects in our community. Local businesses benefit from the increased demand for housing, food, transportation, and entertainment from students and staff. And the reputation of the flight school helps make Harvey Field a hub for aspiring pilots. Our air transportation system needs more pilots now and will need even more in the future.

**2** I had the opportunity to fly a helicopter from Harvey Field! A birthday present from a dear friend. He actually gave me a certificate for a half hour flight in a Cessna aircraft, but when I converted it to a flight on a helicopter. The pilot took off and flew straight to my house, circling it several times for photos before heading over to the river where I was able to take over the controls and practice flying before heading back to Harvey Field where the pilot landed the helicopter. I will never forget that flight as long as I live, it was an amazing experience. And I experienced because of Harvey Field two miles north of my home in Snohomish!

**3** My home has a large and well-tended garden where I spend a great deal of my time every day. During the COVID-19 pandemic shutdown it felt so odd not hearing the sights and sounds I have grown so familiar with in my 28 years living here. I know the sound the jump plane makes when it is climbing. I know the faint distant sound it makes when the pilot cuts back the engine at the top of the climb and that sound tells me where to look for the flashes of skydivers appearing when their chutes open. I know how long to wait to spot them coming down over the airport. I know how to count the chutes using my peripheral vision. I know the sound the plane makes in its steep dive back to the runway to land just ahead of the first jumper. It has become part of the order in my life.

I have many family and friends who have experienced this thrill. But, as much as I appreciate that and love the skydivers, wild horses could not drag me onto that jump plane and I will **\*never\*** jump

3

out of a plane willingly!

I close my comments with the joy I feel when I see the big Chinook military helicopters land at Harvey Field. They usually come in from the south directly over my house and it is absolutely thrilling to hear that thump thump thump sound in the distance that can only be produced by those amazing machines. I stop what I am doing in the garden, or if I am in the house, I run outside, and then wait to watch them appear, usually flying quite low for their approach to Harvey Field. I absolutely love it.

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**From:** Michael D. Edwards

**Sent:** Wednesday, May 8, 2024 1:22 PM

**To:** Cynthia Hendrickson ([cyndyh@harveyfield.com](mailto:cyndyh@harveyfield.com)) <[cyndyh@harveyfield.com](mailto:cyndyh@harveyfield.com)>

**Subject:** Draft EA comment - Edwards - Springhetti Rd

Hello,

I would like to share a comment on the Environmental Assessment.

I moved to my current Snohomish residence, approximately 2 miles due south of Harvey Field, in May 1996.

4

I strongly support the Proposed Action.

My primary comment regards the Airport Way relocation as indicated in Figures 3-12 and 3-13. I am strongly in favor of this aspect of the Proposed Action. Family members driving to/from Snohomish on a near-daily basis generally choose Airport Way as their favorite route into town. From time to time this has included driving past the south end of the runway while a plane is landing directly overhead. This has always made me very uncomfortable and when I am in the driver's seat. I try to time it so the plane is NOT directly overhead my vehicle as I pass the end of the runway. Which involves either speeding up or slowing down. Speeding up is never a good option, as there is a 90-degree bend in the road directly to the east of the runway. If you are heading into town that means speeding up and then quickly breaking for the corner. Or, also a bad option, checking your rear and slowing down if not followed too close by another distracted driver. And if heading home, that means you must make a quick decision as you round the corner. Frankly, the reader may think all this unnecessary and additive to risk, not mitigating risk. However, our family had a personal experience of driving the car immediately behind the one that got hit several years ago when a plane overshot the end of the runway. Thank goodness nobody in the car in front of us nor the plane were injured (which itself is amazing).

5

Secondly, regarding the Proposed Action with respect to the Airport Way relocation, I am concerned about the horrible intersection of Airport Way at Marsh Road and Springhetti Rd. The design is extremely poor for the traffic conditions that persist there and worsen every year. The distance between that three-way intersection and the crossing of Hwy 9 is WAY too short and visibility to see

5

a way clear to proceed through the intersection is extremely poor when full of cars. As it always is during commute times. While a redesign of that intersection is not included in the Proposed Action, we would hope that improving this dangerous intersection is strongly considered when the relocation work is designed. I would like to see a roundabout there.

So, I am very much looking forward to the Airport Way relocation for these noted safety reasons.

6

My secondary comment regards the long-term viability of Harvey Field as critical infrastructure for Snohomish County and its immense value for our community to accommodate and hopefully capitalize from the massive change coming in the way we travel by air. The airport is a vital employment and transportation today and we believe can be much more so in the near future. We need a safe airport to realize those changes.

I think Harvey Field is vital to the future of our town.

I plan to attend the Public Hearing later this month where I look forward to relating these comments in person.

Michael Edwards  
13205 Springhetti Rd  
Snohomish WA 98296  
206-940-5552  
[Michael\\_d\\_edwards@hotmail.com](mailto:Michael_d_edwards@hotmail.com)

## Response to Commenter P-3

1. The comment regarding the economic benefits of Harvey Field and the flight training activities is noted.
2. The comment regarding the helicopter sight-seeing flight is noted.
3. The comment regarding the unique aircraft operations at the Airport is noted.
4. The comment supporting the proposed relocation of Airport Way from a safety standpoint is noted.
5. The intersection of the proposed relocated Airport Way with Springhetti Road and Marsh Road would be determined in the final design phase. Due to the lack of additional vehicle trips being generated with the Proposed Action, as well as the proposal for the relocated Airport Way to tie into the existing intersection of Marsh Road/Springhetti Road, initial coordination with the County was that a traffic study would not be needed. However, the Airport Sponsor would attend a Traffic Pre-submittal Conference with the County during final design, as recommended by the County.
6. The comment supporting the Airport's long-term contributions to the Snohomish area is noted.

## Commenter P-4

**From:** [Cyndy Hendrickson](#)  
**To:** [Barrow, Julie](#)  
**Cc:** [Kandace Harvey](#)  
**Subject:** FW: question  
**Date:** Monday, May 13, 2024 8:30:13 AM

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-----Original Message-----

From: Norman Moss <Norman@1superiormachine.com>  
Sent: Friday, May 10, 2024 5:01 PM  
To: Cyndy Hendrickson <cyndyh@harveyfield.com>  
Subject: question

Greetings,

Two questions actually..

- 1 Is there a drawing of the proposed modifications to the field?
- 2 Second, any plans to blacktop the parking area next to my shop?

Norman

## Response to Commenter P-4

1. The Proposed Action is available to view on the project website (<https://harveyfield.mysocialpinpoint.com/>) and in Figure 1-11 in the Final EA.
2. The Proposed Action does not include paving areas around the hangars or commercial buildings on Airport property.

## Commenter P-5

**From:** [Cyndy Hendrickson](#)  
**To:** [Barrow, Julie](#)  
**Cc:** [Kandace Harvey](#)  
**Subject:** FW: Airport improvements  
**Date:** Monday, May 13, 2024 8:32:43 AM

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-----Original Message-----

From: Mel Chandler <zenith750stol@icloud.com>  
Sent: Friday, May 10, 2024 10:08 PM  
To: Cyndy Hendrickson <cyndyh@harveyfield.com>  
Subject: Airport improvements

Cyndy,

1

I am always pleased to hear of improvements at Harvey Airfield, however, I like the current airfield. The changes are not clear to me from the description provided but seem to eliminate a grass runway, one of the endearing qualities of Harvey Field.

2

My list of improvements would include an increase in amperage electrical power to the hangars, toilets near the hangars (not portapotties), brighter lighting within hangars, more enclosed hangars, and WiFi in the hangars. Otherwise, I believe Harvey is well operated and a real “grass roots aviation” facility. Snohomish should be proud of Harvey airfield!

Thank you for your efforts and best wishes,

Mel Chandler  
Edmonds  
N807CZ

Sent from my iPad

## Response to Commenter P-5

1. The commenter's statement to have the Airport remain "as is" has been noted. The Proposed Action is available to view on the project website (<https://harveyfield.mysocialpinpoint.com/>) and in Figure 1-11 in the Final EA.
2. Improvements to the existing hangars are not part of the Proposed Action.

## Commenter P-6

**From:** [Cyndy Hendrickson](#)  
**To:** [Barrow, Julie](#); [Kandace Harvey](#)  
**Subject:** FW: Comments on proposed Harvey Field Runway Improvement Project  
**Date:** Thursday, May 16, 2024 8:49:42 AM

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**From:** Candace McKenna <candacemckenna1@hotmail.com>  
**Sent:** Wednesday, May 15, 2024 8:27 PM  
**To:** Cyndy Hendrickson <cyndyh@harveyfield.com>  
**Subject:** Comments on proposed Harvey Field Runway Improvement Project

1 I say "NO" to Harvey Field Expansion --

2 Keeping a plane at Harvey Field is how I first discovered the City of Snohomish, where I subsequently chose to put down roots and happily raise my children. Over the more than 35 years I've lived here, I've enjoyed a balloon ride, launched from Harvey, stopped to admire parachutes opening when I heard the plane carrying sky divers cut their engine, and been thankful for the emergency vehicles which can use Harvey Field as a base as needed. Harvey Field enhances my home community of Snohomish.

3 According to the FAA, there is no projected increase in aircraft traffic or demand for Harvey Field. Nearby Paine and Arlington easily accommodate larger planes and other uses requiring a longer runway. Yet Harvey Field has put forward yet another plan to expand without giving a credible reason why this will be a public good. The facts have changed little in the 20 years since their proposal was first put forth, and this time all facts still point to saying "no" again to the proposed expansion.

4 1. Harvey Field is thriving now as it has for the past 80 years. The FAA is NOT threatening to shut it down as a privately-owned airfield. It can continue to thrive in its current configuration.  
2. Harvey Field is claiming that they need to expand to meet FAA regulations, but the reality is that the FAA would only require that Harvey Field meet these regulations if they proceed with expansion.

5 3. Harvey Field has already received \$2.5 million dollars in taxpayer-funded grants to study just this latest proposed **completely optional** expansion. Harvey Field has received over \$4 million in the past 10 years including \$1 million in 2021 to reconstruct the current runway.

6 4. The plan introduces significant potential to disrupt the existing levy system. By putting 9.3 acres of fill into Hanson Slough, this critical floodwater conveyance would no longer function as it currently does. The current study which purports to address flooding concerns by putting in box culverts did NOT consult Snohomish County floodplain hydraulic engineers, the Marshland Flood Control district, FEMA, which has funded local levy improvements, or the Army Corp of Engineers which has acted when levees were breached well as funded and repaired our levees.

5. If expansion is approved

7 a. Our road infrastructure will be stressed for at least two years as many trucks carrying fill are added to Airport Way, Springhetti Road and Highway 9. There are no plans to improve the capacity of the new road.

8 b. The impacts to wildlife, especially fish, are unknown at this time and still under study.

9 c. Our beloved farmlands will be at risk for flooding resulting from changes to a sound flood management structure.

10 I am also urging the Snohomish County Exec. To not give this project status as a Public Works Project and grant a conditional use permit which would allow the rerouting of Airport Way and change the current flood management in that area.

11 This Project proposes an outrageous use of our taxpayer dollars for private gain, at the same time disrupting traffic at an already highly congested intersection, introducing risk to local wildlife, and making unnecessary and potentially damaging changes to flood control.

Candace McKenna

425 9<sup>th</sup> Street

Snohomish, WA 98290

425 308-8168

[Candacemckenna1@hotmail.com](mailto:Candacemckenna1@hotmail.com)

## Response to Commenter P-6

1. The commenter's opposition to the Proposed Action is noted.
2. The commenter's experience with the Airport is noted.
3. The Proposed Action would not expand the Airport or its operations (i.e., would not change the number or type of aircraft currently operating at the Airport). Section 1.3.1 in the Final EA discusses the critical aircraft group at the Airport, which is Aircraft Design Group II (small) and includes a range of aircraft types within that group beyond the Cessna Caravan. The Proposed Action would not expand the Airport. The runway at the Airport would decrease in length from its existing 2,672 feet to 2,400 feet.
4. The comment regarding the historical operation of the Airport is noted. The Proposed Action seeks to enhance safety by addressing nonstandard conditions at the Airport. See the response to Comment #3 above for a discussion on expansion of the Airport.
5. The comment regarding funding for projects at the Airport is not correct. The funding for the Proposed Action is through the Federal Aviation Administration's (FAA) Airport Improvement Program (AIP). Airports within the National Plan of Integrated Airport Systems (NPIAS) are eligible for AIP funds. Harvey Field is in the NPIAS and, thus, is eligible for AIP funds. Funds obligated for the AIP are drawn from the Airport and Airway Trust fund, which is supported by several aviation-user taxes on such items as airline fares, air freight, and aviation fuel. The past and current AIP grants awarded to Harvey Field do not include taxpayer money from the general fund of the U.S. Treasury.
6. The levees surrounding the Study Area are built to be 1-foot above the 5-year (20% annual chance) flood elevation. In the event of levee overtopping, the entire Airport property would become one effective flood storage area (see Figure 3-26 in the Final EA), which would have an increase in storage volume under the Proposed Action due to the net removal of material from the floodplain. The Proposed Action has been conceptually shown to cause no adverse action in the regulatory events and the increase in storage would not have an adverse impact in smaller, non-regulatory events. In conjunction with the County Flood Hazard Permit, a Habitat Assessment and Mitigation Plan would be completed during final design and submitted to Snohomish County in accordance with Federal Emergency Management Agency (FEMA) Region 10 guidance. No changes to the levees are proposed under the Proposed Action; therefore, coordination with the U.S. Army Corps of Engineers (USACE) is not required for the levees.
7. Impacts to surface traffic during construction would be temporary. The proposed relocation of Airport Way would take place during the first construction year, which would minimize impacts to surface traffic. The existing Airport Way would remain operational while the realigned segment is built. The Proposed Action would not increase operations at the Airport and would not generate additional vehicle trips. Therefore, additional

capacity to Airport Way is not proposed. However, the Airport Sponsor would attend a Traffic Pre-submittal Conference with the County during final design, as recommended by the County.

8. Impacts related to biological resources are addressed in Section 3.4 in the Final EA. Section 7 consultation with the National Marine Fisheries Service (NMFS)/U.S. Fish and Wildlife Service (USFWS) was ongoing at the time of the Draft EA publication. The USFWS issued a Letter of Concurrence on October 2, 2024, for the effects on bull trout and designated critical habitat (see Appendix C in the Final EA). However, NMFS held that the Proposed Action is likely to adversely affect Endangered Species Act (ESA)-listed salmonids, their critical habitat, and essential fish habitat for Pacific Coast salmon due to the effects from the pollutant 6PPD, and thus required formal consultation. Therefore, a revised BA was prepared and submitted to NMFS on September 5, 2024, with an adverse effect determination (see “NMFS Consultation” in Appendix C in the Final EA). NMFS issued their Biological Opinion on June 26, 2025. Section 7 consultation with both agencies (i.e., NMFS and USFWS) is summarized in Section 3.4.4 in the Final EA and Appendix C in the Final EA has been updated with the results of the consultation with these agencies.
9. Section 3.8.4.2 in the Final EA describes the impacts to farmlands that would occur as a result of the Proposed Action. Farming activities would continue to occur on Harvey-owned property. Additionally, as stated in the Final EA, the Airport Sponsor coordinated with the U.S. Department of Agriculture Natural Resources Conservation Service for the farmlands using the Form AD-1006, Farmland Conversion Impact Rating. It was determined through Form AD-1006 that the Proposed Action would have no significant impact on farmlands because the combined score was 147 points, which is below the significant impact threshold of 200 points.
10. The proposed relocation of Airport Way has been deemed a public work project by Snohomish County exempting it from the density fringe regulations (Appendix I in the Final EA provides correspondence with the County to this effect). As noted in Section 3.16.2.4 in the Final EA, the road relocation project component of the Proposed Action would be exempt from the density fringe requirements.
11. The comment regarding funding and general opposition to the Proposed Action is noted. See the response to Comment #5 of this letter for a discussion on funding. Section 3.14.3 in the Final EA discusses impacts to surface traffic. Section 3.4 in the Final EA discusses impacts to Biological Resources. Section 3.16.2 in the Final EA discusses impacts to Floodplains.

## Commenter P-7

**From:** [Cyndy Hendrickson](#)  
**To:** [Barrow, Julie](#)  
**Cc:** [Kandace Harvey](#)  
**Subject:** FW: I am opposed to the proposed expansion of Harvey Field  
**Date:** Thursday, May 16, 2024 1:02:08 PM

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**From:** penelope.guntermann@gmail.com <penelope.guntermann@gmail.com>  
**Sent:** Thursday, May 16, 2024 11:11 AM  
**To:** Cyndy Hendrickson <cyndyh@harveyfield.com>  
**Subject:** I am opposed to the proposed expansion of Harvey Field

Dear Ms. Harvey,

- 1 I am writing to express my opposition to the proposed expansion of Harvey Field.
- 2 The rerouting of Airport Way and the expansion of the airfield into Hanson Slough would drastically reduce the ability of the Slough to function as the flood plain it currently is. There is already significant history of flooding of the Slough and the airport and surrounding areas, even with the current functioning of the Slough. To reduce that ability of the Slough to function as intended is to increase the risks of damage to the levy, the airfield itself and surrounding farms, homes and businesses, and possibly Highway 9 itself, when there is a flood. This is especially important given the predictions of more extreme weather events in the future, with probably increasingly severe flood risks. It is unreasonable to increase the flood risks for the surrounding community, and for the airport itself, for a project that is unnecessary and does not benefit the larger community.
- 3 Second, my understanding is that there is no real need for expansion of the airport. The FAA is not going to shut it down; compliance with current FAA standards is not required unless there is an expansion. Also, the FAA does not anticipate a higher demand for use of this airfield,  
4 given nearby airfields. There is no positive public benefit that I can see to the project, only negative impacts on Snohomish and the surrounding community, including the increased risk of significant flooding in the future and the negative impacts on traffic patterns of rerouting Airport Way and the hundreds of dump trucks required for providing fill for the road and the airfield. IF there actually were an increase in use of the airfield, it would be accompanied by increased air traffic noise over the surrounding area, another negative impact on the community and on wildlife.
- 5 Third, there are far more urgent and socially responsible uses for the taxpayer funds that would be required for rerouting the road, dealing with floods and flood repairs, and other funds involved in the project. There have already been significant amounts of taxpayer funds used in grants to the airfield to reconstruct the current runway and to study this proposal. The costs to taxpayers of additional studies, rerouting Airport way, dealing with costs from increased flooding and flood damage would be significant. Our taxpayer funds should be used for

**5** projects that benefit the larger community, meet basic needs of our underserved, or traffic projects that benefit all of us, instead of a project that benefits only a few (who are already wealthy enough to afford planes) and could cost many neighbors their livelihood or businesses due to flooding.

**6** Fourth, the larger Snohomish community has opposed the two prior attempts at expansion for the same reasons many of us oppose this current proposal. Nothing has changed in our environment or the current and future status of airfield that would call for support of this project. There is no good reason to support this current expansion proposal. I am disappointed that you are pursuing this yet again. NO means NO.

Sincerely,  
Penelope Guntermann  
6330 Northridge Drive, Snohomish  
425-478-7727

## Response to Commenter P-7

1. The commenter's opposition to the Proposed Action is noted.
2. A portion of the Proposed Action would occur in Hanson Slough. Culverts are proposed beneath relocated Airport Way along the primary flowpath for the drainage basin for Hanson Slough (see Figure 3-35 in the Final EA). These proposed culverts would minimize impacts to drainage for runoff and floodwaters. The location, number of culverts, and culvert sizing would be completed in final design. Appendix I in the Final EA has been revised to include floodplain modeling for the Proposed Action. Floodplain modeling that was inclusive of airfield and roadway improvements indicates that the FEMA-established BFEs would not increase as a result of the Proposed Action for the regulatory 100-year (one percent-annual-chance) flood event. Additional floodplain modeling will be conducted in final design and the Proposed Action will be required to demonstrate that it does not contribute to a cumulative increase in Base Flood Elevations (BFEs) that exceeds the limits prescribed in the Snohomish County Code 30.65 to obtain the County Flood Hazard Permit.
3. The Proposed Action would not expand the Airport or its operations (i.e., would not change the number or type of aircraft currently operating at the Airport). The Proposed Action seeks to enhance safety by addressing nonstandard conditions at the Airport.
4. The Proposed Action seeks to enhance safety by addressing nonstandard conditions at the Airport. The runway at the Airport would decrease in length from its existing 2,672 feet to 2,400 feet. Additionally, relocating Airport Way would move the road further from the end of the runway, thereby enhancing safety for the road and Airport users alike. Further, and as stated in Section 3.14.3.3 in the Final EA, the relocated Airport Way would include dedicated shoulders and bicycle lanes, which would enhance safety on that roadway. Enhancing safety and providing shoulders and bicycle lanes are considered to be public benefits to the public commenters who have asked for shoulders and bicycle lanes. As stated in Section 3.13.4 in the Final EA, the Proposed Action would decrease the noise exposure area by about 4 acres.
5. The comment regarding funding for projects at the Airport is not correct. The funding for the Proposed Action is through the Federal Aviation Administration's (FAA) Airport Improvement Program (AIP). Airports within the National Plan of Integrated Airport Systems (NPIAS) are eligible for AIP funds. Harvey Field is in the NPIAS and, thus, is eligible for AIP funds. Funds obligated for the AIP are drawn from the Airport and Airway Trust fund, which is supported by several aviation-user taxes on such items as airline fares, air freight, and aviation fuel. The past and current AIP grants awarded to Harvey Field do not include taxpayer money from the general fund of the U.S. Treasury. No general taxpayer money has been used. The proposed relocation of Airport Way is part of the safety enhancements to move the road away from the runway end and away from potential accidents with aircraft.

6. The opposition to the Proposed Action is noted. The Proposed Action would not expand the Airport or its operations (i.e., would not change the number or type of aircraft currently operating at the Airport).

## Commenter P-8

**From:** [Cyndy Hendrickson](#)  
**To:** [Barrow, Julie](#)  
**Cc:** [Kandace Harvey](#)  
**Subject:** FW: why?  
**Date:** Wednesday, May 22, 2024 9:33:10 AM

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**From:** Hansen, Cindy L. <CHansen2@everettsd.org>  
**Sent:** Wednesday, May 22, 2024 8:31 AM  
**To:** Cyndy Hendrickson <cyndyh@harveyfield.com>  
**Subject:** why?

1 I do not understand why a public road is being changed to accommodate a private airport. Airport way is a major arterial besides hwy 9. To make the changes increases traffic on hwy 9 and more congestion. I do not condone this plan at all. If the private owners of Harvey airfield need something different-plan a different plan and do not frustrate drivers using our public roads to accommodate your needs.

## Response to Commenter P-8

1. The current alignment of Airport Way places it just 10 feet from the end of Runway 33R. As stated in Section 1.1.2 in the Final EA, vehicles traveling on Airport Way are directly under aircraft landing and taking off on the existing runways. Additionally, there are no dedicated shoulders or bicycle lanes on the existing Airport Way. The relocation of Airport Way would relocate the road further away from the runway end to minimize the amount of linear feet of roadway within the RPZ, which is considered a public benefit. A recent accident on June 1, 2024, where an aircraft overran the end of the runway and collided with a vehicle on Airport Way highlights the nonstandard conditions of the current alignment of Airport Way. The Runway Protection Zones (RPZs) are imaginary surfaces that outline an area that are trapezoidal shapes meant to enhance the protection of people and property on the ground in the event of an incident within those areas. Ideally an RPZ is entirely on Airport property. RPZs are not physical structures or development. However, when an RPZ extends off airport property, attempts are made to reach an agreement with landowners to keep the RPZ free of structures, obstructions, and incompatible land uses.

Additionally, the relocated road would have dedicated shoulders and a bicycle lane. The Proposed Action would not increase the aviation activity at the Airport beyond what is currently forecasted; therefore, there would be no changes in the level of service (LOS) Airport Way currently provides. The purpose of the proposed Airport Way relocation is not to improve LOS, but to provide a greater separation distance between the runway end and the road. Due to the lack of additional vehicle trips being generated with the Proposed Action, as well as the proposal for the relocated Airport Way to tie into the existing intersection of Marsh Road/Springhetti Road, initial coordination with the County was that a traffic study would not be needed. However, the Airport Sponsor would attend a Traffic Pre-submittal Conference with the County during final design, as recommended by the County.

## Commenter P-9

**From:** [Barb Bailey](#)  
**To:** [Cyndy Hendrickson](#); [Barrow, Julie](#); [m.mccrary@snoco.org](mailto:m.mccrary@snoco.org); [michael.dobesh@snoco.org](mailto:michael.dobesh@snoco.org); [kelly.snyder@co.snohomish.wa.us](mailto:kelly.snyder@co.snohomish.wa.us); [dmccormick@snoco.org](mailto:dmccormick@snoco.org); [Stockdale, Erik](#); [Eric.Parks@co.snohomish.wa.us](mailto:Eric.Parks@co.snohomish.wa.us); [ken.klein@snoco.org](mailto:ken.klein@snoco.org)  
**Subject:** Harvey Airfield Draft EA - Airport Way relocation plans  
**Date:** Tuesday, May 21, 2024 4:07:09 PM

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May 21, 2024

Please add to my comments on the Draft EA:

- 1 Page 7-4 of the 2018 Aviation Master Plan notes that **there has been extensive coordination with Snohomish County PDS and Snohomish County Public Works** in planning and design for Airport Way relocation. Are the documents produced by this **"close collaboration"** between the Airport and Snohomish County available to the public? I am unable to find any specific information for the relocation plans for Airport Way in the Draft EA.
- 2 Page 6-8 of the 2018 Aviation Master Plan mentions that County road standards would have to be met and that the road would be constructed at or above the elevation of existing Airport Way which is about the same level as the railroad. That means the floodwater that flows under the 12 ft. RR trestle openings would then immediately have to flow up about 12 feet ***and over*** the new elevated Airport Way before dumping into Hanson Slough. Water does not flow up. Is the plan for the road to be built on piers like the Everett trestle so the floodwater can flow under the new Airport Road and into the slough?
- 3 Regarding the hydraulic study done by West Consultants, Page 6-21 of the Master Plan mentions **openings** in the roadway embankment as a **requirement** for the project to work hydraulically.
- 4 In order to make an informed comment on the proposed road design, more information is needed. The obstruction of floodwater conveyance into Hanson Slough caused by the relocated Airport Way is our primary concern.

Sincerely,  
Barbara Bailey  
12711 Springhetti Rd.  
Snohomish, WA 98296  
360-568-8826

## Response to Commenter P-9

1. Documentation regarding 2018 MP coordination and consultation is contained in an appendix to the 2018 MP. The 2018 Master Plan and all appendices is available online on the Airport website at <http://sites.jviation.com/harveyfield/2018-documents.html>.
2. A portion of the Proposed Action would occur in Hanson Slough. In flooding events greater than the 5-year (20% annual chance) flood event, which would result in levee overtopping, the Harvey Property, including Hanson Slough, becomes one effective storage area designated as Storage Area #9 (see Figure 3-26 in the Final EA). Culverts are proposed beneath the proposed relocated Airport Way along the primary flowpath for the drainage basin for Hanson Slough (see Figure 3-35 in the Final EA). These proposed culverts would minimize impacts to drainage for runoff and floodwaters. The location, number of culverts, and culvert sizing would be completed in final design. Appendix I in the Final EA has been revised to include floodplain modeling for the Proposed Action. Floodplain modeling that was inclusive of airfield and roadway improvements indicates that the FEMA-established BFEs would not increase as a result of the Proposed Action for the regulatory 100-year (one percent-annual-chance) flood event. Additional floodplain modeling will be conducted in final design and the Proposed Action will be required to demonstrate that it does not contribute to a cumulative increase in Base Flood Elevations (BFEs) that exceeds the limits prescribed in the Snohomish County Code 30.65 to obtain the County Flood Hazard Permit.
3. Culverts are proposed along the proposed relocated Airport Way along the primary flowpath for the drainage basin for Hanson Slough (see Figure 3-35 in the Final EA). These proposed culverts would minimize impacts to drainage for runoff and floodwaters. The location, number of culverts, and culvert sizing would be completed in final design.
4. See response to Comment #2 about floodplain modeling and hydraulics.

## Commenter P-10

**From:** [Barb Bailey](#)  
**To:** [Barrow, Julie](#); [cyndyh@harveyfield.com](mailto:cyndyh@harveyfield.com)  
**Subject:** Jviation 2018 Airport Master Plan  
**Date:** Saturday, May 18, 2024 12:29:51 PM

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1 Hi, I am reading through the Draft EA again and see many references to the Jviation 2018 Airport Master Plan and Appendixes. Where is that document available?

Thanks,  
Barbara Bailey

## Response to Commenter P-10

1. The 2018 Master Plan is available online on the Airport website at <http://sites.jviation.com/harveyfield/2018-documents.html>.

## Commenter P-11

**From:** [Barb Bailey](#)  
**To:** [lore.randall@ecy.wa.gov](mailto:lore.randall@ecy.wa.gov); [fedconsistency@ecy.wa.gov](mailto:fedconsistency@ecy.wa.gov); [teressa.pucylowski@ecy.wa.gov](mailto:teressa.pucylowski@ecy.wa.gov); [ilon.logan@faa.gov](mailto:ilon.logan@faa.gov); [Barrow, Julie](#); [m.mccrary@snoco.org](mailto:m.mccrary@snoco.org); [Sigua, Braden](#); [erik.stockdale@co.snohomish.wa.us](mailto:erik.stockdale@co.snohomish.wa.us)  
**Subject:** DOE approval of Harvey Airfield expansion in Snohomish floodplain  
**Date:** Sunday, May 19, 2024 2:40:52 PM

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Dear Ms. Randall,

1

I was very disappointed to see your approval of the proposed Harvey Airfield expansion project in the Snohomish River floodplain. I do not believe you received complete information regarding the history of frequent and severe flooding in this area. I absolutely disagree with the applicant's statement that there would be no obstruction of floodwater. The Airport Road relocation would completely obstruct the present floodwater flow into Hanson Slough. Hanson Slough is critical to floodwater conveyance. Obstruction of floodwater conveyance is what causes our levees to fail.

We are 5th generation farmers living about a mile south of Harvey Airfield. We believe this development would significantly and possibly catastrophically increase the flood hazard for all of us sharing this floodplain.

I am forwarding my comments on the EA to you. I hope you take my flood photographs, newspaper stories, and home video recordings into account as consideration of this floodplain development project for Harvey Airfield moves forward.

I am also copying an aide for Senator John Lovick who is very familiar with the flood history in this area.

Sincerely,

Barbara Bailey  
12711 Springhetti Rd.  
Snohomish, WA 98296  
360-568-8826

## Response to Commenter P-11

1. The commenter's email to the Department of Ecology regarding approval of the Proposed Action is noted.

## Commenter P-12

**From:** [Cyndy Hendrickson](#)  
**To:** [Barrow, Julie](#)  
**Cc:** [Kandace Harvey](#)  
**Subject:** FW: Harvey Airfield Runway Improvement Question  
**Date:** Monday, May 20, 2024 9:04:21 AM

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**From:** Steve Russo, PE <[srusso@umci.com](mailto:srusso@umci.com)>  
**Sent:** Sunday, May 19, 2024 11:52 AM  
**To:** Cyndy Hendrickson <[cyndyh@harveyfield.com](mailto:cyndyh@harveyfield.com)>  
**Subject:** Harvey Airfield Runway Improvement Question

Cyndy:

1

My understanding is that this runway improvement would also require changes to Airport Way, which presumably would disrupt traffic on that road. WSDOT is currently preparing to let contracts for the expansion of SR9 from Marsh Road to Second Street in Snohomish (2 lanes to 4 lanes). Has anyone coordinated timelines for each project such that both primary Snohomish access roads would not be disrupted at the same time? I am a Snohomish resident and am hoping that this is not the case.

Thanks,



Steve Russo, PE  
OR/SWW Group Director  
[\(206\) 730-3522](tel:(206)730-3522)  
[srusso@umci.com](mailto:srusso@umci.com) | [www.umci.com](http://www.umci.com)



## Response to Commenter P-12

1. According to the Washington State Department of Transportation (WSDOT), construction on State Route 9 is projected to start in early 2025 and be completed in 2026.<sup>1</sup> Construction of the proposed relocated Airport Way is anticipated to occur in 2026.

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<sup>1</sup> WSDOT. SR 9 – Marsh Road to 2nd Street Vicinity – Widening & Bridge Painting. Retrieved July 2024, from WSDOT: <https://wsdot.wa.gov/construction-planning/search-projects/sr-9-marsh-road-2nd-street-vicinity-widening-bridge-painting>.

## Commenter P-13

**From:** [Cyndy Hendrickson](#)  
**To:** [Barrow, Julie](#)  
**Cc:** [Kandace Harvey](#)  
**Subject:** FW: Expansion  
**Date:** Monday, May 20, 2024 10:03:57 AM

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**From:** mark37f <mark37f@gmail.com>  
**Sent:** Monday, May 20, 2024 8:58 AM  
**To:** Cyndy Hendrickson <cyndyh@harveyfield.com>  
**Subject:** Expansion

Greetings,

1

As an aviator out of Paine Field I note that the proposed runway expansion is only 2,400 feet long. Please note that our insurance on rental 172 and 152 aircraft forbids use of runways less than 2,500 feet long.

If you can squeeze out another 100 feet that would allow us the use of your airfield.

Thanks,

Mark Janis

## Response to Commenter P-13

1. The commenter's response regarding insurance for aircraft is noted. The Proposed Action calls for a runway length of 2,400 feet. The 2018 Master Plan discusses runway length options and determined 2,400 feet would meet the needs of the Airport and meet local regulations.

## Commenter P-14

**From:** [Cyndy Hendrickson](#)  
**To:** [Barrow, Julie](#)  
**Cc:** [Kandace Harvey](#)  
**Subject:** FW: Draft EA  
**Date:** Wednesday, May 22, 2024 1:18:05 PM

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**From:** Cheri Misich <misich.cheri@gmail.com>  
**Sent:** Wednesday, May 22, 2024 11:55 AM  
**To:** Cyndy Hendrickson <cyndyh@harveyfield.com>  
**Subject:** Draft EA

May 22, 2024

1

My name is John Misich. My family has lived in the Snohomish River Valley for more than 100 years. I have lived within two miles of Harvey Field for more than 70 years.

I received the Draft EA, and attended the Public Meeting on May 14. I spoke with some of the officials at the presentation.

I have no concerns with anything that was presented either in print or verbally. I am very much in favor of upgrading Harvey Field as presented.

Sincerely,

John Misich

( 425.870.5685 )

## Response to Commenter P-14

1. The comment regarding support of the Proposed Action is noted.

## Commenter P-15

**From:** [Cyndy Hendrickson](#)  
**To:** [Barrow, Julie](#)  
**Cc:** [Kandace Harvey](#)  
**Subject:** FW: response to Airfield expansion  
**Date:** Thursday, May 23, 2024 8:43:47 AM

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**From:** Don Satko <don.satko@gmail.com>  
**Sent:** Thursday, May 23, 2024 7:39 AM  
**To:** Cyndy Hendrickson <cyndyh@harveyfield.com>  
**Subject:** response to Airfield expansion

1

My family moved to Snohomish 36 years ago, I am second generation owner of the property directly to the south of Hanson Slough. For the most part our town of Snohomish and the Valley has stayed the same, I believe this is why people come here. Snohomish is revered for its agricultural fields teaming with produce and flowers, wedding and event venues, downtown's uniquely creative small owned businesses and our celebrations of life! The valley and town survive on this draw to our community. Before we risk any of this we should look back on the history of the valley and its flood waters.

Over the past decades we have seen Hanson Slough filled with rain and flood water that pushes up against our property. When flooding occurs the proposed area for the expansion and Airport Way reroute has been under water. This has been a natural relief area for mild and heavy flooding. The proposed expansion and road reroute will take a considerable amount of fill material to match the established elevations which will then block the flow of water and push it directly toward our community to the south. The floods of 1975, 1990 and 2006 have established that Hanson Slough fills up to and beyond the current Airport Way. Those of us that have lived here for some time have seen the destruction first hand when this has occurred. This should be in the forefront of everyone's mind when a proposal is being presented that will disrupt the natural flow of the water in the valley.

2

Wildlife and Migrating birds use Hanson Slough, which we see every year. Our skies and fields are full of the migrating geese and ducks, the treed area to the south of the slough is home to a multitude of wildlife and birds also. The environmental damage we will cause by tearing down the green spaces in the density fringe area as proposed by the Harvey's plan will be devastating. It is of utmost importance to keep our green spaces. According to Harvey's EA there has not been a wildlife survey completed. What they did provide was a couple day site visit observation in June.

3

What happens if this expansion into the flood plain and re-routing of Airport Way doesn't occur? Nothing changes! The airfield continues as it is and Hanson Slough remains for GENERATIONS to come protecting the community from flood damage! Let's not spend Taxpayers money on a privately owned business expansion. We have far too many more pressing issues that the money would be better spent on.

Thank you for your consideration.

Don Satko

9605 111<sup>th</sup> Street SE

Snohomish, WA. 98296

## Response to Commenter P-15

1. As noted in Section 3.16.2.4 in the Final EA, culverts are proposed beneath relocated Airport Way along the primary flowpath for the drainage basin for Hanson Slough (see Figure 3-35 in the Final EA). These proposed culverts would minimize impacts to drainage for runoff and floodwaters. The location, number of culverts, and culvert sizing would be completed in final design. Appendix I in the Final EA has been revised to include floodplain modeling for the Proposed Action. Floodplain modeling that was inclusive of airfield and roadway improvements indicates that the FEMA-established BFEs would not increase as a result of the Proposed Action for the regulatory 100-year (one percent-annual-chance) flood event. Non-regulatory flood events that are less than the FEMA-regulatory 100-year (1-percent-chance) flood event were also analyzed for potential changes in flood elevations in response to public comments received on the Draft EA and for informational purposes only. Additional floodplain modeling will be conducted in final design and the Proposed Action will be required to demonstrate that it does not contribute to a cumulative increase in BFEs that exceeds the limits prescribed in the Snohomish County Code 30.65 to obtain the County Flood Hazard Permit.
2. The Proposed Action construction and operational activities would have no direct effects on the abundance of snow goose or quality of migratory bird habitat because the Proposed Action would occur within the footprint of Airport property that has been previously disturbed. The Airport has developed and implemented a Wildlife Hazard Management Plan (WHMP) that is intended to avoid or minimize bird-aircraft strikes. The Proposed Action would not expand the Airport or its operations (i.e., would not change the number or type of aircraft currently operating at the Airport) and the WHMP would be used during and after construction activities to avoid interference on Airport operations by migratory birds.

A Wildlife Hazard Assessment (WHA) was prepared in 2016 for the Airport that documented snow geese flying over the Airport and using fields about a mile away from the Airport. The WHA did not observe any large-bodied birds, such as the snow geese, landing on the airfield during WHA-related surveys. A WHMP was developed in 2017 following the completion of the WHA to minimize wildlife hazards. To minimize any impacts to aviation activities and to bird populations, the WHMP states that:

“Hazard management for avian species will include regular observation and monitoring by airport staff, and non-lethal hazing to disperse birds as needed. If non-lethal hazing proves ineffective, lethal removal will be considered. Appropriate federal and state depredation permits will be acquired to support lethal removal of regulated birds.”

3. The EA considers consequences of the No Action Alternative and Proposed Action based on significance thresholds required by Federal Aviation Administration (FAA) Order 1050.1F. The funding for the Proposed Action is through the FAA’s Airport

Improvement Program (AIP). Airports within the National Plan of Integrated Airport Systems (NPIAS) are eligible for AIP funds. Harvey Field is in the NPIAS and, thus, is eligible for AIP funds. Funds obligated for the AIP are drawn from the Airport and Airway Trust fund, which is supported by several aviation-user taxes on such items as airline fares, air freight, and aviation fuel. The past and current AIP grants awarded to Harvey Field do not include taxpayer money from the general fund of the U.S. Treasury.

## Commenter P-16

**From:** [Barb Bailey](#)  
**To:** [Cyndy Hendrickson](#); [Barrow, Julie](#); [gfarris@co.snohomish.wa.us](mailto:gfarris@co.snohomish.wa.us); [Stockdale, Erik](#); [m.mccrary@snoco.org](mailto:m.mccrary@snoco.org)  
**Subject:** Harvey Airfield Draft EA - Flood Storage and Discharge location  
**Date:** Thursday, May 23, 2024 11:52:24 AM

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May 23, 2024

Please add to my comments on the Draft EA:

1 Page 3-76 of the Draft EA notes: *Floodwater would then discharge either to the west under the overpass for State Route 9 (Woodinville Snohomish Road) or to the east under an existing railroad overpass.*"

Figure 3-77 of the Draft EA shows these two flood discharge locations marked by a star.

Page 3-7 of the Draft EA makes reference to this easterly discharge mechanism as the 1,100 foot long culvert which drains Hanson Slough into Batt Slough.

It appears that the discharge location to the east is dependent upon a handshake agreement between 2 farmers in the early 1990s. There is no legal easement.

I am curious how this unguaranteed flood discharge location to the east may affect the hydraulic study done by West Consulting in 2016. According to the Technical Memo by West Consultants:

*"The change of storage, and therefore water surface elevation, equals flows into the area minus flows leaving."*

Thank you for adding these comments to my previous comments.

Barbara Bailey  
12711 Springhetti Rd.  
Snohomish, WA 98296  
360-568-8826

## Response to Commenter P-16

1. Sections 3.16.2.3 and 3.16.3.3 in the Final EA have been revised to discuss the culvert connecting Hanson Slough to Batt Slough and its associated tidegate. Floodwater discharge locations would not be altered as a result of the Proposed Action. Appendix I in the Final EA has been revised to include floodplain modeling for the Proposed Action. Floodplain modeling that was inclusive of airfield and roadway improvements indicates that the FEMA-established BFEs would not increase as a result of the Proposed Action for the regulatory 100-year (one percent-annual-chance) flood event. Non-regulatory flood events that are less than the FEMA-regulatory 100-year (1-percent-chance) flood event were also analyzed for potential changes in flood elevations in response to public comments received on the Draft EA and for informational purposes only.



SEATTLE WA 980  
20 MAY 2024 PM 3 L



**RECEIVED**  
5/23

C.C.

LYNTHIA HENORICKSON  
AIRPORT MANAGER  
9900 AIRPORT WAY  
SNOHOMISH, WASHINGTON  
98296

98296-827399



5/19/2024

1  
Re: AIRPORT PROPOSAL  
NOI

BARBARA HAWKINS



## Response to Commenter P-17

1. The commenter's opposition to the Proposed Action is noted.

## Commenter P-18

Date: 24 May 2024  
From: Richard Softye  
To: Airport Manager; Cynthia Hendrickson  
Subj: Harvey Field Runway Improvement Project; Comments

1 Background: I am a retired 27 Year resident of Snohomish living with my wife in a 1903 home. Our home has been chosen several times to be put on the Historical Society tours. In addition we have a 100 plus year old tree that is highlighted on the Snohomish Tree Tour. We take pride in maintaining our home to show visitors to this great little city what it means to hold onto Snohomish heritage and charm. It is a combination of this type of historic property and the quaint shops in town that makes Snohomish a destination for many visitors and homeowners.

I do not seek any assistance in maintaining my large old home, grounds and trees. I would not seek assistance to install a new roof, paint the exterior, upgrade lighting, install security, update HVAC and maintain giant trees. Therefore, what makes this major private property undertaking so important to citizens of Snohomish?

My points of contention regarding upgrading Harvey Field:

2 1. The airport is privately owned just as my house is privately owned. Why should federal funds and increased taxing (soon to arrive when the Port of Everett taxes go into effect) be used to satisfy the desires of a private property owner?

3 2. There will certainly be lots of inconvenience for the citizenry of Snohomish IF a new perimeter road construction is undertaken. Who then is responsible for maintaining this road? Is future funding being planned for this?

4 3. I can only assume that countless numbers of trucks will congest our roadways delivering the necessary fill to satisfy the private owners desire to fill in a floodplain area that through historic records shows extensive damage from flooding.

5 4. In speaking with the FAA at the last two Harvey Field public meetings I was told that the airport can continue to run safely into the indefinite future as is. So why is it so important to spend the millions of dollars to “upgrade” something that is already operating within the laws and regulations that govern airport operations and safety?

6 5. I also understand that the FAA forecast has determined that there will not be an increase in numbers of aircraft. So why is part of the plan to build more hangars? Why is extra fuel storage necessary? If an aircraft operator wants to provide expanded services at this airport, is approval necessary? How much expansion would be too much? Do the citizens of Snohomish have a say in numbers of landings and takeoffs if this project was to be approved? “Make improvements and they will come” Who ultimately decides?

7 6. What benefit would this airport project do for me and my family? I personally do not fly an airplane nor do I know anyone in this town that does. I remember one of the past city council meetings years ago when a VERY large contingent of out of town pilots and aircraft owners took up all the seats in the room. They obviously wanted to have a show of force which became very obvious to me that out of towners own/operate most if not all aircraft at

7 Harvey Field. I just have concerns over uncontrolled growth should this quaint little airfield join the big league.

8 7. Do emergency public services have a say in this process? Do the law enforcement agencies have a say in this process? Do emergency medical agencies weigh in on possible increased staffing or training with increasing the size and volume of aircraft? Does the Fire Department weigh in also?

9 My bottom line: If I have to provide the funding for improvements to my private property, why can this private property owner lean on the federal government and the citizens of Snohomish for gain that what appears to me is only realized by the current private property owner.

Rich Softye

1314 4<sup>th</sup> St

Snohomish, Wa 98290

206-696-3762

rksoftye@gmail.com

## Response to Commenter P-18

1. The commenter's statement regarding the maintenance of their home is noted. The Proposed Action seeks to enhance safety by addressing nonstandard conditions at the Airport.
2. The comment regarding an upcoming Port of Everett tax is noted but beyond the scope of this EA. As stated in Section 1.2.1 in the Final EA, the Airport is designated by the Federal Aviation Administration (FAA) as a reliever airport in the National Plan of Integrated Airport Systems (NPIAS), thereby allowing it to receive federal funding. The funding for the Proposed Action is through the FAA's Airport Improvement Program (AIP). Airports within the National Plan of Integrated Airport Systems (NPIAS) are eligible for AIP funds. Harvey Field is in the NPIAS and, thus, is eligible for AIP funds. Funds obligated for the AIP are drawn from the Airport and Airway Trust fund, which is supported by several aviation-user taxes on such items as airline fares, air freight, and aviation fuel. The past and current AIP grants awarded to Harvey Field do not include taxpayer money from the general fund of the U.S. Treasury.
3. Section 3.14.3.3 discusses the proposed relocated Airport Way. Following the construction, the Airport Sponsor would dedicate the right-of-way to Snohomish County Public Works.
4. Construction-related impacts to traffic would be temporary and the relocation of Airport Way would take place during the first construction year. Culverts are proposed beneath relocated Airport Way along the primary flowpath for the drainage basin for Hanson Slough (see Figure 3-35 in the Final EA). Section 1.1.3 has been added to the Final EA to provide an overview of flooding history, levees, and flood control improvements in the Study Area. Appendix I in the Final EA has been revised to include floodplain modeling for the Proposed Action. Floodplain modeling that was inclusive of airfield and roadway improvements indicates that the FEMA-established BFEs would not increase as a result of the Proposed Action for the regulatory 100-year (one percent-annual-chance) flood event. Non-regulatory flood events that are less than the FEMA-regulatory 100-year (1-percent-chance) flood event were also analyzed for potential changes in flood elevations in response to public comments received on the Draft EA and for informational purposes only. Additional floodplain modeling will be conducted in final design and the Proposed Action will be required to demonstrate that it does not contribute to a cumulative increase in BFEs that exceeds the limits prescribed in the Snohomish County Code 30.65 to obtain the County Flood Hazard Permit
5. The Proposed Action seeks to enhance safety by addressing nonstandard conditions at the Airport. The proposed relocation of Airport Way would relocate the road further away from the runway end to minimize the amount of linear feet of roadway within the Runway Protection Zone (RPZ), which is considered a public benefit. A recent accident on June 1, 2024, where an aircraft overran the end of the runway and collided with a vehicle on Airport Way. The Runway Protection Zones (RPZs) are imaginary surfaces that outline

an area that are trapezoidal shapes meant to enhance the protection of people and property on the ground in the event of an incident within those areas. RPZs are not physical structures or development. Ideally an RPZ is entirely on Airport property. However, when an RPZ extends off airport property, attempts are made to reach an agreement with landowners to keep the RPZ free of structures, obstructions, and incompatible land uses.

6. The Proposed Action does not include additional hangars or fuel storage. The Proposed Action would not expand the Airport or its operations (i.e., would not change the number or type of aircraft currently operating at the Airport).
7. As a public use airport, neither the FAA nor the Airport Sponsor have the authority to control what airports can and cannot be used by general aviation aircraft. Members of the public currently use the Airport, as well as a flight school and skydiving operation.
8. Emergency Public Service Agencies are allowed to comment on the EA. The Proposed Action would not expand the Airport or its operations (i.e., would not change the number or type of aircraft currently operating at the Airport). Emergency Public Service Agencies would also be included in the Snohomish County Permit review process.
9. See the response to Comment #2 of this letter for a discussion on funding.

## Commenter P-19

**From:** [windchimehouse@comcast.net](mailto:windchimehouse@comcast.net)  
**To:** [dave.somers@co.snohomish.wa.us](mailto:dave.somers@co.snohomish.wa.us); [Eric.Parks@co.snohomish.wa.us](mailto:Eric.Parks@co.snohomish.wa.us); [ken.klein@snoco.org](mailto:ken.klein@snoco.org); [m.mccrary@snoco.org](mailto:m.mccrary@snoco.org); [michael.dobesh@snoco.org](mailto:michael.dobesh@snoco.org); [Sam.Low@snoco.org](mailto:Sam.Low@snoco.org); [jared.mead@snoco.org](mailto:jared.mead@snoco.org); "Megan"; [nate.nehring@snoco.org](mailto:nate.nehring@snoco.org); [strom.peterson@snoco.org](mailto:strom.peterson@snoco.org); "Linda Redmon (Mayor)"; [kuleta@snohomishwa.gov](mailto:kuleta@snohomishwa.gov); [neals@snohomishwa.gov](mailto:neals@snohomishwa.gov); [merrill@snohomishwa.gov](mailto:merrill@snohomishwa.gov); [flynn@snohomishwa.gov](mailto:flynn@snohomishwa.gov); [l.burke@snohomishwa.gov](mailto:l.burke@snohomishwa.gov); [guzak@snohomishwa.gov](mailto:guzak@snohomishwa.gov); [eidem@snohomishwa.gov](mailto:eidem@snohomishwa.gov); [hetherington@snohomishwa.gov](mailto:hetherington@snohomishwa.gov); "Scott"; [michelle.walker@usace.army.mil](mailto:michelle.walker@usace.army.mil); [charles.h.iff@usace.army.mil](mailto:charles.h.iff@usace.army.mil); [douglas.t.weber@usace.army.mil](mailto:douglas.t.weber@usace.army.mil); [erik.stockdale@co.snohomish.wa.us](mailto:erik.stockdale@co.snohomish.wa.us); "Marshland Flood Control"; [luca.schmit@snoco.org](mailto:luca.schmit@snoco.org); [dara.salmon@snoco.org](mailto:dara.salmon@snoco.org); [kelly.snyder@co.snohomish.wa.us](mailto:kelly.snyder@co.snohomish.wa.us); [dmcormick@snoco.org](mailto:dmcormick@snoco.org); [donald.hubner@noaa.gov](mailto:donald.hubner@noaa.gov); [kim.kratz@noaa.gov](mailto:kim.kratz@noaa.gov); [ryan\\_mcreynolds@fws.gov](mailto:ryan_mcreynolds@fws.gov); [casework@murray.senate.gov](mailto:casework@murray.senate.gov); [suzan.delbene@mail.house.gov](mailto:suzan.delbene@mail.house.gov); [maria@cantwell.senate.gov](mailto:maria@cantwell.senate.gov); [mike\\_spahn@murray.senate.gov](mailto:mike_spahn@murray.senate.gov); [mike\\_spahn@murray.senate.gov](mailto:mike_spahn@murray.senate.gov); [jami\\_burgess@cantwell.senate.gov](mailto:jami_burgess@cantwell.senate.gov); [john.lovick@leg.wa.gov](mailto:john.lovick@leg.wa.gov); "Semir"; [April.Berg@leg.wa.gov](mailto:April.Berg@leg.wa.gov); [brandy.donaghy@leg.wa.gov](mailto:brandy.donaghy@leg.wa.gov); [Barrow,Julie](mailto:Barrow,Julie); [cyndyh@harveyfield.com](mailto:cyndyh@harveyfield.com)  
**Cc:** [windchimehouse@comcast.net](mailto:windchimehouse@comcast.net)  
**Subject:** FW: Comment on Harvey Field Runway Improvement Project Environmental Assessment 5.24.24  
**Date:** Friday, May 24, 2024 2:12:03 PM  
**Attachments:** [image002.png](#)  
**Importance:** High

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**Ms. Cynthia Hendrickson**  
**Airport Manager**  
**9900 Airport Way**  
**Snohomish, Washington, 98296**  
[cyndyh@harveyfield.com](mailto:cyndyh@harveyfield.com)

### Re: Harvey Field Runway Improvement Project Environmental Assessment

Ms. Hendrickson,

After seeing the most recent slides at the Harvey Public Meeting on May 14, 2024 I have a few more comments to add.

- 1 Firstly, the deadline for us to comment is May 24, 2024. It does not make sense that our comments have a deadline of May 24, 2024 when, in fact, the consultants have not completed all the findings in the Airport's presentation. Of great concern is the lack of data on the new Airport Road - one of the most critical factors in this whole proposal. Don't make short deadlines for comments if the proposal is not complete.
- 2 We just do not believe the "improvements" the Airport wants, (like moving Airport Road or scraping down the floodplain for runways or filling the slough) will not harm the fish, the birds, the wetlands, the fauna and flora, and the floodplain. There will be all kinds of contamination: to soils, miserable noise and ongoing traffic. You will immediately impact, now and forever, the quality of life of those people whose homes are by the new Airport Road. They did not sign up for the Airport's development plan. They, like so many of us, accepted the Airport for what it has been, a recreational (reliever) airport operating within its present format. Everyone appreciates the colorful balloons, muses over the rejoicing skydivers and tolerates the airplane noise. Now, the Airport is changing what we understood as the paradigm. This does not put the Airport in a good light.
- 3 It is incumbent on every land owner in the floodplain to be responsible and respectful and partner with neighbors to reduce flood risk and not endanger others by thinking only of themselves. The levee system works as a cooperative balanced system. "The effect of a project on public safety and

3 health should be evaluated both upstream and downstream..." Source:  
<https://www.snohomishcountywa.gov/DocumentCenter/View/6699/Flood-Hazard-Management-Issues-in-Snohomish-County?bidId=> What's really disheartening is that the majority of folks at the Airport are not from our Snohomish Community, they are from outside Snohomish. They have no interest in the quality of our daily lives in Snohomish. Many of them fly too low over our homes, and nothing has changed since 2006 when we moved into our house.

4 No amount of professional slide decks and public meetings, and contrived numbers utilizing wetland credits from wetland banks, or immense negative numbers to prove "net zero" fill mitigation will convince us that the developments the Airport wants are OK and good for the rest of us. This EA is sorely lacking facts from the government agencies at the local, state and federal levels who, over time, have been involved in handling ongoing floodplain crises. The Airport's EA is misleading and lacks crucial facts about historic floods, current weather assessments, geology and hydrology, and climate changes over time.

5 The truth is, the Airport development will have a negative impact on the rest of us, on our properties, on our livelihoods, on the enjoyment of our homes and businesses, on our tourism, on our sports teams, on our quality of life going forward in time. What the Airport wants to do today will impact us now, and in the future, and benefit the Airport only.

6 "Benefits should be measured as a project's effect on flood damages over the entire river system. Costs should be measured as public and private costs for implementing and maintaining the project over the long term. Benefits may also include non-quantifiable societal benefits, such as protecting agricultural land, recreational opportunities, cultural areas, or historical areas. For a project to receive approval, the **benefits of reducing flood damage over the entire river system should exceed the long-term costs.**" Source:  
<https://www.snohomishcountywa.gov/DocumentCenter/View/6699/Flood-Hazard-Management-Issues-in-Snohomish-County?bidId=>

7 We are being setup for more risk. The Airport is not acting as a good neighbor. We can document the risk by counting the numbers of significant floods per Flood Hazard Management Issues in Snohomish County, Source:  
<https://www.snohomishcountywa.gov/DocumentCenter/View/6699/Flood-Hazard-Management-Issues-in-Snohomish-County?bidId=> , and reading articles in the papers. "Some of the larger floods in Snohomish County occurred in 1897, 1917, 1932, 1951, 1958, 1959, 1975, 1977, 1980 and 1986. More recently, large floods occurred in 1990 (twice), 1995 (twice), 1996, 1997, 2003, 2006, 2007 and 2009."

Also from that same document: "Some damage totals from recent floods are shown below:"

7

Flood Event	FEMA Disaster Record #	Date	FEMA Prelim. Damage Assessment
2003 flood	1499-DR	11/2003	\$18,000,000
2006 floods	1641-DR	2/2006	\$1,975,369
	1671-DR	11/2006	\$18,772,675
2009 flood	1817-DR	1/2009	\$3,284,412

Historical data on flood levels at various locations on the big rivers is available online through the Snohomish County Flood Warning System, which is covered in more detail on page X of this handout.

“More than 75,000 people live and work in places where potentially devastating floods can occur. **The major river basins – the Snohomish and the Stillaguamish - on average flood every three to five years, often at the same time.** Big creeks draining through south Everett, Mill Creek, Lynnwood and Bothell also bear watching. **Since 1962, the county has weathered 18 floods large enough to be presidentially declared disasters. The worst arrived during the winter of 1975, causing \$42 million in damage and the deaths of 3500 head of livestock.** Flood season here typically begins in October and lasts into spring. The threat is greatest between late November and early February. That’s when storms heading inland from the Pacific Ocean bring heavy rains and mild temperatures, often melting mountain snows and spurring rivers to jump over their banks....”Source: [Flooding | Snohomish County Public Safety Hub \(arcgis.com\)](http://www.snohomishcountywa.gov/arcgis).

8

If Airport Road is demolished then moved there will be two years where folks will go elsewhere rather than deal with all the miserable dust and dirt, and caravans of dump trucks, and demolition and construction obstacles in and around Snohomish. That’s not good for residents, tourism, recreation and the livelihood of business people in town. Is the Airport going to compensate the public for the inconvenience and loss of income? And what if all that development leads to another bigger crisis during another flood because of all the fill work, especially in and around the sloughs? Is the Airport going to compensate residents, business owners and farmers, local and state government agencies? If you say it’s all safe, and it fails, then what?

9

Additionally, let’s be honest, the developments you propose are not necessary, they are optional. You are not being forced to do this. You will not lose your growing business if you do not disturb the status quo. In fact, the Airport would be better perceived by the community if none of these changes occur.

10

The Airport has been operating for 80 years, and now, suddenly, you have safety issues. What? In 2006, we were worried about your judgement regarding the existing and/or increasing airplane traffic, noise, and future runway expansion. On April 17, 2007 300 neighbors descended on the City Council Meeting with a petition showing 1000 names of residents who opposed Airport Expansion. Today, you are justifying our concerns. You are back at it again. It looks like we do have reasons to be

10 worried about the Airport's judgment regarding airplanes at the airport. The truth is, the Airport has been pushing the envelope and exceeding the limitations of your own equipment. You admitted so much in your power point slides. Even if we agreed with the Airport on the developments, what guarantee do we have that you won't push the envelope further again? We can also look into the future, and we understand the meaning of charts that problem-solve scenarios as a matrix. You wanted a lot more in 2006. **Now, these "improvements" appear to be an incremental plan proposed a different way.** It's clear, we need to protect our turf, because you do not understand we mean "No to Airport Expansion."

11 Safety is just a good cover to placate those of us who oppose: floodplain development, runway extension into a slough, and demolishing then building a new Airport Road disguised as a "public works" project. This project is all about the Airport plans for the future. We are not fooled by your public relations assurances that it's a safety issue. It's about profits, expansion and the Airport legacy.

And now, it seems Airport Road is a private/public project? Source: "Havey Field plan poses concerns from neighbors" By Michael Whitney, May 22, 2024, Snohomish Tribune. When an airport starts doing private/public improvements the taxpayers need to be concerned. The Airport has access to its own money, and/or industry grants, and/or infrastructure (taxpayer monies) and could possibly even have access to future tax levies. It seems the Airport is a private business very anxious to get money from whatever sources it can to do whatever it wants. What's the agreement between the Airport and government agencies that give the Airport money? That wasn't in the Public Meeting May 14<sup>th</sup> posters. What happens if the Airport achieves a GA status?

12 The Airport's safety issues are the result of owning Cessna planes that are too big and too heavy for the limitations of your own property. That's not our problem. Maybe the Airport should operate within its means and be respectful of the community. We should not have to compensate the Airport for its inability to use good math and science. And maybe what's really needed here, is a permanent community group to monitor the Airport going forward, so the interests of the community come first. Afterall, there are more of us who own homes or businesses here in Snohomish than fly planes.

Sincerely,  
Beth Jarvis  
1914 5<sup>th</sup> Street  
Snohomish WA 98290  
Phone: 360-563-9376

## Response to Commenter P-19

1. Circulation of a Draft EA for public comment is optional according to FAA guidance. The comment period for the Harvey Field Draft EA was 42 days and falls within FAA's guidance of a 30- to 45-day comment period should the Draft EA be circulated for public comment. The Proposed Action would not increase the aviation activity at the Airport beyond what is currently forecasted; therefore, there would be no changes in the level of service (LOS) Airport Way currently provides. The purpose of the proposed Airport Way relocation is not to improve LOS, but to provide a greater separation distance between the runway end and the road. Due to the lack of additional vehicle trips being generated with the Proposed Action, as well as the proposal for the relocated Airport Way to tie into the existing intersection of Marsh Road/Springhetti Road, initial coordination with the County was that a traffic study would not be needed. The Final EA analyzes the road relocation as part of the Proposed Action. All elements of the Proposed Action are analyzed in accordance with FAA Order 1050.1F. However, the Airport Sponsor would attend a Traffic Pre-submittal Conference with the County during final design, as recommended by the County.
2. Impacts related to biological resources are addressed in Section 3.4 in the Final EA. Impacts related to surface traffic are addressed in Section 3.14.3 in the Final EA. Impacts related to noise from aircraft are addressed in Section 3.13 in the Final EA. Impacts related to floodplains are addressed in Section 3.16.2 in the Final EA.
3. The levees surrounding the Study Area are built to be 1-foot above the 5-year (20% annual chance) flood elevation. In the event of levee overtopping, the entire Airport property would become one effective flood storage area (see Figure 3-26 in the Final EA), which would have an increase in storage volume under the Proposed Action. The Proposed Action has been conceptually shown to cause no adverse action in the regulatory events and the increase in storage suggests that it would not have adverse impact in smaller, non-regulatory events. The Proposed Action does not propose changes to the levees.
4. Section 1.1.3 has been added to the Final EA to provide an overview on flooding history, levees, and flood control improvements in the Study Area. Sections 3.16.2.3 and 3.17.2.4 in the Final EA have been revised to include discussion of climate change and sea level rise based on published sources applicable to the Study Area in accordance with FAA Desk Reference 1050.1F, Section 3.5, Climate Adaptation. FAA Order 1050.1F does not identify sea level rise as an environmental impact category nor provide significance thresholds, or factors to consider in its evaluation. The EA follows the format and requirements identified in FAA's implementing instructions for NEPA review and analysis. The document considers environmental consequences of the No Action Alternative and Proposed Action based on significance thresholds as outlined in Table 4-1 of FAA Order 1050.1F. Additional review of the proposal will be conducted by Snohomish County during final design and permitting.

5. The comment regarding negative impacts from Airport development is noted. Section 3.14 in the Final EA discusses impacts to Socioeconomics, Children’s Environmental Health and Safety Risks, and Surface Transportation related to the Proposed Action.
6. Appendix I in the Final EA has been revised to include floodplain modeling for the Proposed Action. Floodplain modeling that was inclusive of airfield and roadway improvements indicates that the FEMA-established BFEs would not increase as a result of the Proposed Action for the regulatory 100-year (one percent-annual-chance) flood event. Non-regulatory flood events that are less than the FEMA-regulatory 100-year (1-percent-chance) flood event were also analyzed for potential changes in flood elevations in response to public comments received on the Draft EA and for informational purposes only. Additional floodplain modeling will be conducted in final design and the Proposed Action will be required to demonstrate that it does not contribute to a cumulative increase in BFEs that exceeds the limits prescribed in the Snohomish County Code 30.65 to obtain the County Flood Hazard Permit. The Proposed Action also results in a net removal of material from the density fringe floodplain, resulting in increased flood storage.
7. The comment regarding historical flooding in the major river basins is noted. Section 1.1.3 has been added to the Final EA to provide an overview of flooding history, levees, and flood control improvements in the Study Area.
8. The existing route of Airport Way would remain operational while the realignment of Airport Way is constructed. The relocation would take place during the first construction year. No businesses would be relocated or closed because of the Proposed Action. In the event of levee overtopping, the entire Airport property would become one effective flood storage area (see Figure 3-26 in the Final EA), due to the net removal of material from the floodplain, which would have an increase in storage volume under the Proposed Action. The Proposed Action has been conceptually shown to cause no adverse action in the regulatory events and the increase in storage suggests that it would not have adverse impacts in smaller, non-regulatory events.
9. The Proposed Action is being undertaken to meet current Federal Aviation Administration (FAA) standards as defined by the FAA in Advisory Circular (AC) 150/5300-13B, *Airport Design*.
10. The Proposed Action would not expand the Airport or its operations (i.e., would not change the number or type of aircraft currently operating at the Airport).
11. The Proposed Action seeks to enhance safety by addressing nonstandard conditions at the Airport. The runway at the Airport would decrease in length from its existing 2,672 feet to 2,400 feet. Additionally, relocating Airport Way would move the road further from the end of the runway, thereby enhancing safety for the road and Airport users alike. Further, and as stated in Section 3.14.3.3 in the Final EA, the proposed relocated

road would include dedicated shoulders and bicycle lanes, of which do not occur on the existing Airport Way. Enhancing safety and providing shoulders and bicycle lanes are considered to be public benefits to the public commenters who have asked for shoulders and bicycle lanes. The Final EA analyzes the road relocation as part of the Proposed Action. All elements of the Proposed Action are analyzed in accordance with FAA Order 1050.1F. As stated in Section 1.2.1 in the Final EA, the Airport is designated by the Secretary of Transportation as a reliever airport, thereby allowing it to receive federal funding for airport development projects provided the Airport meets the legal and financial requirements outlined in 49 USC §§ 47105-47107. This includes, but is not limited to, maintaining, and operating the Airport as a public-use airport to current FAA standards.

12. The runway at the Airport would not be extended; the length of the runway would decrease from its existing 2,672 feet to 2,400 feet. The shifted location of the new runway and the decrease in length are a result of meeting the density fringe requirements of Snohomish County, and to meet FAA safety standards for runways and taxiways. Section 1.3.1 in the Final EA discusses the critical aircraft group at the Airport, which is Aircraft Design Group II (small) and includes a range of aircraft types within that group beyond the Cessna Caravan. The Final EA follows the guidance of the FAA Order 1050.1F and FAA Order 5050.4B.

## Commenter P-20

Dear Ms. Hendrickson,

- 1 I am submitting comments on the Draft Environmental Assessment for the Proposed Action to expand runways at Harvey Airfield and reroute Airport Way. I live downstream from Harvey Airfield very much in the flight influence zone of both Snohomish and Paine Field in Everett. The image below, which I happened to capture while watching birds on my road, illustrates the plane traffic my area receives even though we are considered well outside of flight paths and “influence areas” for either airport. Both planes were at low altitude over my neighbor’s house:



- 2 I am concerned about the statement that only substantive comments will be made public and what the interpretation of “substantive” will be. Considering that the developer intends to seek federal funds for this project, it seems inconsistent and inappropriate. I will take initiative to share comments with agencies and other community members, but I would encourage Harvey Airfield to be as transparent as possible, especially considering past outreach efforts that negatively affected the Airfield’s credibility.

### Purpose

- 3 The developer’s fluctuating framing for the project is concerning and appears to be intended to reduce need for mitigation and costs to a private developer.  
  
The purpose has been alternately framed as a compliance requirement in recent Airport Master Plan process, and now it is being framed as a safety requirement. What is left out of the purpose is that the airport **has elected to allow** larger aircraft use the existing facility. While it may be correct to say that a change in runway is required to safely accommodate those larger planes, the current framing leaves out

3 the obvious: the developer could select the No Action alternative and focus services on smaller planes. If the impacts of the project are found to be substantive, this option- though clearly unattractive to the owner- should be recommended.

4 In letters to Snohomish County, the developer has sought to characterize this as a public project, which it distinctly is not. In fact, in the Alternatives Analysis process, I provided comment opposing use of public funds for the realignment of Airport Way solely to accommodate a private development. Declaring the facility an Essential Public Facility may be correct on a technical level, but on a practical level, skydiving and flight training for those that can afford to fly does not appear to be essential.

5 While Harvey Airfield is a permitted use and a long-time business with historic roots in the Snohomish area, it is not accurate to characterize expansion in any way as a public project or broad public benefit.

### General

6 The map used to describe the Airport Influence Area continues to underestimate the area of influence and fails to describe impacts of flights and potential flood impacts beyond a very narrow area.

7 The Proposed Action permanently appears to eliminate 5 acres of prime farmland, 21 large trees, 0.12 acre of wetland and introduces 5.7 acres of impervious surface and approximately 20,000 CY of fill (requiring over 1000 truck trips). And yet, the document indicates no significant impacts for most elements or for the project, much as the environmental review for the 2006 proposal. While this proposal is modest compared to the previous one, it still seems that the developer may be underestimating impacts or leaving some considerations out.

### Floodplains

8 I observed that the zoning designation of Density Fringe is mentioned frequently and appears to be conflated with impacts and outcomes as opposed to allowable land uses under certain condition in floodplains. In addition, the July 2022 correspondence from Snohomish County Planning and Development Services indicates that the Airport Way realignment may or may not fall under Density Fringe exemptions.

It is not appropriate to subtract impacts from additional fill for Airport Way by justifying removal of Airport Way as a feature exempt from Density Fringe constraints. The July 2022 letter indicates that Airport Way may be exempt, but that the Proposed Action is a private project, not a public one.

Since both elements are part of a private development proposal, they should be considered in combination for all impacts identified, including flood impacts over time in the context of impacts from increasing development, sea level rise, river sedimentation and affects of dike breaching projects in the area.

This document identifies a non-scenario (the Proposed Action raising levels in the Snohomish River, below) but fails to address the very real scenario: the additional fill and project design could exacerbate impacts to surrounding areas in an overtopping flood.

*A major factor contributing to the development of established BFEs is the amount of water that would overtop existing levees in the Snohomish River in a flood event. As the Proposed Action would have no effects on water levels in the Snohomish River, the amount of floodwater entering the Harvey Field flood storage area (Figure 6) as the result of overtopping levees would not change*

8 Additionally, the Proposed Action does not incorporate projection of increasing impacts to Snohomish River water levels in all conditions, relying on a static picture of hydraulic behavior. Factors that are affecting river levels now and into the future are:

- Increased development and impervious surfaces that result in increased runoff
- Sea level rise due to climate change
- Rising river bottom due to sedimentation and prohibition of dredging under ESA listing for salmonids
- Salmon recovery projects that involve dike breaching and impact river levels at low tide

A 2021 report identifies significant rise in the floodwater level in a 10-year event in Marshlands by mid-century, and predicts more frequent dike overtopping due to sea level rise. Since 2021, sea level rise has accelerated beyond predictions of previous models, so the 2021 prediction may be extremely conservative, both in time of onset and projected levels. Since the Proposed Action is expected to be functional well into the future, impacts of fill and the retaining wall and other water diversion structures should include climate change modeling to evaluate how much water will be displaced to surrounding properties. [H&H Modeling in the Snohomish Watershed Report \(snohomishcountywa.gov\)](#)

#### Hazardous materials and environmental impacts

9 Harvey Airfield continues to use leaded aviation fuel and projects over 4600 more flights per year by 2033. However, impacts to air, soil, and groundwater and potential to disperse through flight paths and flooding events do not seem to have been considered in this document. Testing and appropriate disposition of any lead-contaminated soil are not described but should be included. Nearby properties are used for food production, recreation, and events, and the project area abuts wetlands and the Snohomish area.

Harvey Airfield should address the potential for lead emissions exposure on surrounding properties, especially since some support outdoor farm-related activities. Current findings are that no amount of lead exposure in children is inconsequential, and that small aircraft are a significant contributor of lead as an air pollutant.

[EPA Determines that Lead Emissions from Aircraft Engines Cause or Contribute to Air Pollution | US EPA](#)

[Federal Register :: Finding That Lead Emissions From Aircraft Engines That Operate on Leaded Fuel Cause or Contribute to Air Pollution That May Reasonably Be Anticipated To Endanger Public Health and Welfare](#)

10 I do not see analysis of the Airport Way relocation to consider treatment of runoff to treat tire dust, nor an evaluation of how the relocation would affect remaining wetland areas. If Airport Way is to be rerouted, the developer should include bioretention or some other treatment. [Saving Washington's salmon from toxic tire dust - Washington State Department of Ecology.](#)

11 In reference to potential for increased overtopping of dikes due to sea level rise alone (likely exacerbated by continuing development and dike breaching projects), the increased potential for contaminants from the Airfield site to be dispersed during overtopping floods to adjacent properties and drained to the Snohomish River should be evaluated for all elements of the Proposed Alternative. Mitigation options should be considered to avoid contaminating farmland and the Snohomish River during increasing overtopping flood events.

## Traffic

**12** The proposal indicates that no permanent impacts to traffic are expected but does not address temporary impacts during construction. While Airport Way may be constructed in a new alignment without affecting traffic, a letter to Snohomish County indicates that the project anticipates adding 20,000 CY of fill, which would take over 1,000 trucks to haul. In addition to contractor employees, materials, and disposal, this level of truck traffic on an already congested area with insufficient capacity for existing traffic will cause significant impacts to commuters. Some proportion of commuters must be assumed to be meeting Social Vulnerability Index thresholds.

**13** If Airport Way is to be relocated for this project, especially with federal funds as a possibility, the developer should be required to propose mitigation measures during construction (e.g. hauling hours outside usual rush hours) and to add sufficient safe space (potentially a dedicated lane) for bicyclists to use the rerouted Airport Way. Also, the rerouted Airport Way should be designed to infiltrate and treat road runoff (see above).

## Climate

**14** The DEA proposes that no mitigation is needed for Greenhouse Gas Emissions, not because there are none, but because there are no thresholds established by the FAA, and because there are no permanent new sources. However, there will be emissions:

*The CO2 emissions from non-road equipment and on-road equipment are estimated to be 2,282.85 tons and 318.45 tons, respectively.*

Especially if this project receives federal (public) funding, the developer should be required to consider offset of these emissions. It appears that construction related traffic impacts will be significant in an already congested, under capacity area, so mitigation is further justified.

Recycling runway surfaces and using fly ash or recycled material for the restored runway, contributing to public reforestation efforts, and other actions could offset GHG- and should, considering public impacts from this private development.

## Wetlands and tree removal

**15** The Proposed Action includes impacts to wetlands and wetland buffer and removal of 21 trees, dependent on approval of an adjacent private property owner. The developer identifies mitigation for wetland impacts as purchasing wetland banking credits at site located distal to Harvey Airfield. Based on the finding that there is deficient salmonid habitat in this area of the Snohomish River, the developer should focus mitigation efforts in this area. Trees slated for removal were observed to be used as hunting perches for raptors; due to increasing development such as the Proposed Action, replacement in the vicinity is strongly recommended to avoid critical habitat loss in a rapidly developing area. [Snohomish Estuary Project Prioritization | Washington Department of Fish & Wildlife](#)

16

I recognize that Harvey Airfield is a long-standing member of the Snohomish business community, and that the Harvey family has been involved in the local community. I respect the Airfield's freedom to propose projects that will help it to thrive and meet regulations. I hope you will consider community comments and concerns with equal respect.

Thank you,

Monica Van der Vieren

5727 Rivershore Road

Snohomish, WA 98290

Mvanderv4137@outlook.com

## Response to Commenter P-20

1. The comment regarding flight traffic including other airports is noted.
2. All comments received during the comment period for the Draft EA have been reviewed and have received a response.
3. Section 1.3.1 in the Final EA discusses the critical aircraft group at the Airport, which is Aircraft Design Group II (small) and includes a range of aircraft types within that group beyond the Cessna Caravan. The Aircraft Design Group would not change because of the Proposed Action. Additionally, an Airport Sponsor cannot prohibit aircraft from operating at its airport. As a public use airport, neither the FAA nor the Airport Sponsor have the authority to control what airports general aviation aircraft can and cannot use.
4. The relocation of Airport Way has been deemed a public work project by Snohomish County exempting it from the density fringe regulations (Appendix I in the Final EA provides correspondence with the County to this effect). The Essential Public Facility designation is from the Washington State Growth Management Act. The Airport Sponsor would pay for the relocation of Airport Way and following the construction, the Airport Sponsor would dedicate the right-of-way to Snohomish County Public Works.
5. The EA does not characterize the Proposed Action as an expansion project. There are public benefits associated with the Proposed Action, but the Proposed Action primarily seeks to enhance safety at the Airport.
6. The Airport Influence Area is to discourage incompatible land uses around the Airport and does not discuss potential flood impacts. Impacts to Floodplains are discussed in Section 3.16.2 in the Final EA and are focused on the Study Area.
7. The EA follows the format and requirements identified in FAA's implementing instructions for NEPA review and analysis. The document considers environmental consequences of the No Action Alternative and Proposed Action based on significance thresholds as outlined in Table 4-1 of FAA Order 1050.1F.
8. The proposed relocation of Airport Way has been deemed a public work project by Snohomish County exempting it from the density fringe regulations (Appendix I in the Final EA provides correspondence with the County to this effect). Existing levees surrounding the Study Area are designed to be 1 foot above the 5-year (20% annual chance) flood event. The existing alignment of Airport Way, which serves as a drainage divide for Harvey Property is lower than this flood elevation. In flooding events greater than the 5-year (20% annual chance) event, the Harvey Property becomes one effective storage area, designated as Storage Area #9 (see Figure 3-26 in the Final EA). Appendix I in the Final EA has been revised to include floodplain modeling for the Proposed Action. Floodplain modeling that was inclusive of airfield and roadway improvements indicates that the FEMA-established BFEs would not increase as a result

of the Proposed Action for the regulatory 100-year (one percent-annual-chance) flood event. Non-regulatory flood events that are less than the FEMA-regulatory 100-year (1-percent-chance) flood event were also analyzed for potential changes in flood elevations in response to public comments received on the Draft EA and for informational purposes only. Additional floodplain modeling will be conducted in final design and the Proposed Action will be required to demonstrate that it does not contribute to a cumulative increase in BFEs that exceeds the limits prescribed in the Snohomish County Code 30.65 to obtain the County Flood Hazard Permit. Culverts are proposed beneath relocated Airport Way along the primary flowpath for the drainage basin for Hanson Slough (see Figure 3-35 in the Final EA). The Proposed Action also results in a net removal of material from the density fringe floodplain, resulting in increased flood storage. All the above represent efforts to mitigate impacts to the floodplain and demonstrate compliance with the County's density fringe floodplain development criteria, as requested by the commentor. Sections 3.16.2.3 and 3.16.2.4 in the Final EA have been revised to include discussion of climate change and sea level rise based on published sources applicable to the Study Area in accordance with FAA Desk Reference 1050.1F, Section 3.5, Climate Adaptation. FAA Order 1050.1F does not identify sea level rise as an environmental impact category nor provide significance thresholds, or factors to consider in its evaluation.

9. The Proposed Action would not result in any change in the use of leaded gas at Harvey Field. The use of leaded gas would be the same under both the No Action Alternative and the Proposed Action. Any phase out of the use of leaded gas is beyond the scope of the EA. Impacts to air quality are discussed in Section 3.3 in the Final EA. Impacts to groundwater are discussed in Section 3.16.4 in the Final EA.
10. Impacts related to biological resources are addressed in Section 3.4 in the Final EA. Section 7 consultation with the National Marine Fisheries Service (NMFS)/U.S. Fish and Wildlife Service (USFWS) was ongoing at the time of the Draft EA publication. The USFWS issued a Letter of Concurrence on October 2, 2024, for the effects on bull trout and designated critical habitat (see Appendix C in the Final EA). However, NMFS held that the Proposed Action is likely to adversely affect Endangered Species Act (ESA)-listed salmonids, their critical habitat, and essential fish habitat for Pacific Coast salmon due to the effects from the pollutant 6PPD, and thus required formal consultation. Therefore, a revised BA was prepared and submitted to NMFS on September 5, 2024, with an adverse effect determination (see "NMFS Consultation" in Appendix C in the Final EA). NMFS issued their Biological Opinion on June 26, 2025. Section 7 consultation with both agencies (i.e., NMFS and USFWS) is summarized in Section 3.4.4 in the Final EA and Appendix C in the Final EA has been updated with the results of the consultation with these agencies.
11. The Airport Sponsor would be responsible for obtaining an Industrial Stormwater General Permit (ISGP), which would outline floodproofing requirements for industrial chemicals present at the Airport. All hazard materials associated with construction of the

Proposed Action would be stored in compliance with federal, state, and local regulatory requirements and permit conditions requiring pollution prevention measures.

12. The existing route of Airport Way would remain operational while the realignment of Airport Way is constructed. The proposed relocation would take place during the first construction year. Impacts to surface traffic are temporary and would only last during the construction period.
13. As stated in Section 3.14.3.3 in the Final EA, the relocated road would include dedicated shoulders and bicycle lanes. Construction traffic typically is scheduled to avoid rush hour traffic to improve efficiency in the construction process. Culverts are proposed beneath relocated Airport Way along the primary flowpath for the drainage basin for Hanson Slough (see Figure 3-35 in the Final EA). These proposed culverts would minimize impacts to drainage for runoff and floodwaters. The location, number of culverts, and culvert sizing would be completed in final design.
14. The commenter is correct in noting that thresholds for Greenhouse Gasses have not been established by the federal government. As shown in Appendix B in the Final EA, the Construction Emissions Inventory determined no exceedance of National Ambient Air Quality Standards thresholds during the construction of the Proposed Action. Recycling of materials could be implemented by the selected construction contractor but would be agreed to at the time of construction. Materials for construction would need to meet FAA and local standards.
15. Trees identified for removal in the Proposed Action are on private property and can only be trimmed or removed subject to an agreement with the property owner. As described in Section 3.16.1, the type, location, and amount of mitigation required as compensation for wetland impacts will be determined during final design and permitting.
16. The comment regarding concerns for the Proposed Action and support of the Airport as a member of the community are noted.

## Commenter P-21

Date: May 24,2024

From: Doug Bates

To: Harvey Field Airport Manager: Cynthia Hendrickson

Topic: Harvey Field Runway Improvement Project Environmental Assessment (EA)

- 1 As a local resident since 2001 and a Construction and Development Manger for over 30 years I was both surprised and shocked by the "Open House" presentation of your project as presented on May 14, 2024.

Having been involved with Public Review Presentations throughout my career, I have never been so confused with the multiple station foam board type presentation, with much of the information fragmented or non-existent during this open house. Usually there is formal introduction of the project by the owner or their representative, as well as introduction of the team members present at these meetings. None was done here.

That left all in attendance to ask each team member separately the same questions to try to get straight forward replies. Most of these replies were incomplete or not available as the **actual** person to address them were not even present. Even the available single page handout (8 ½ x 11) showing only the existing airfield conditions created more questions than answers. Why wasn't the Proposed New Improvements and layout included as a handout too? **This suggests that you are trying to hide or not share important project info about your project with the public.**
- 2 A very hot topic of concern was brought to the lead presenters' attention by myself and others, only to hear from the FAA rep, Consultant firm Lead, and the Airport owner herself, that they were not aware of the Port of Everetts action to get ALL of Snohomish County included in their Tax District so that we the citizens who live here will get taxed for improvements that get done for the Airport Project now and in the future. Rumored comments by the Port of Everett lead have suggested that they could provide all new road fill material for the relocated Airport Way project.
- 3 This proposed project benefits the Airport Owner Directly and nobody else! Using Federal funds and Port of Everett funding by Taxing all in Snohomish County including All in Snohomish for a private airport venture is very troubling! More Air and Ground Traffic, disregard for existing storm overflow runoff areas, more pressure on Police and Fire responses, added overhead noise and ultimately more crime that commonly follows new development seam to be all that the City of Snohomish and surrounding community gains. What does the City of Snohomish think about this project and Public Works components of it? Again, no comments by the group on this.
- 4 I chose to reside in this small Historic treasure of a town in 2001 to leave the heavy urban Seattle area and all the negatives that thrive there. The proposed Harvey Airport Project ultimately threatens this Historic Towns core and I will not stand by and let the will and whim of one single airport owner, continue with plans to destroy this special place. She has tried this previously and

4 appears to be ignoring the public and professional dialogue provided on these well documented issues once again.

Doug Bates

417 Ave E

Snohomish, WA 98290

425 577-0415

doubat0422@gmail.com

## Response to Commenter P-21

1. The comments regarding the open house format are noted. Information regarding the Proposed Action and impacts to the resource categories described in the EA were provided and members of the EA team were available for questions.
2. The Port of Everett tax on Snohomish County residents is beyond the scope of the EA. As stated in Section 1.2.1 in the Final EA, the Airport is designated by the FAA as a reliever airport in the National Plan of Integrated Airport Systems (NPIAS), thereby allowing it to receive federal funding. The funding for the Proposed Action is through the Federal Aviation Administration's (FAA) Airport Improvement Program (AIP). Airports within the National Plan of Integrated Airport Systems (NPIAS) are eligible for AIP funds. Harvey Field is in the NPIAS and, thus, is eligible for AIP funds. Funds obligated for the AIP are drawn from the Airport and Airway Trust fund, which is supported by several aviation-user taxes on such items as airline fares, air freight, and aviation fuel. The past and current AIP grants awarded to Harvey Field do not include taxpayer money from the general fund of the U.S. Treasury.
3. The comment regarding funding is noted. No funds from the Port of Everett are currently provided for the Proposed Action. The Proposed Action would not increase operations at the Airport and would not generate additional vehicle trips. Culverts are proposed beneath relocated Airport Way along the primary flowpath for the drainage basin for Hanson Slough (see Figure 3-35 in the Final EA). These proposed culverts would minimize impacts to drainage for runoff and floodwaters. The location, number of culverts, and culvert sizing would be completed in final design. Appendix I in the Final EA has been revised to include floodplain modeling for the Proposed Action. Floodplain modeling that was inclusive of airfield and roadway improvements indicates that the FEMA-established BFEs would not increase as a result of the Proposed Action for the regulatory 100-year (one percent-annual-chance) flood event. As stated in Section 3.13.4 in the Final EA, the Proposed Action would decrease the noise exposure area by about 4 acres. Potential increases in crime resulting from the Proposed Action is beyond the scope of the EA. The EA follows the format and requirements identified in FAA's implementing instructions for NEPA review and analysis. Additional review of the proposal will be conducted by Snohomish County during final design and permitting.
4. The commenter's opposition to the Proposed Action is noted.

## Commenter P-22

**From:** [Cyndy Hendrickson](#)  
**To:** [Barrow, Julie](#)  
**Cc:** [Kandace Harvey](#)  
**Subject:** FW: Comment On Harvey Field Draft Environmental Assessment  
**Date:** Friday, May 24, 2024 3:58:48 PM

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**From:** Drew Carlson <drew.carlson8@gmail.com>  
**Sent:** Friday, May 24, 2024 2:24 PM  
**To:** Cyndy Hendrickson <cyndyh@harveyfield.com>  
**Subject:** Comment On Harvey Field Draft Environmental Assessment

Dear Ms Cynthia Hendrickson,

This email is sent as comment in regards to the proposed Harvey Field Runway Improvement Project Environmental Assessment (EA). I have been advised that you handle such comments for RS&H and the proposed project. There are a number of items in the report that have been misrepresented that I would like to point out.

### TOPIC 1: AIRPORT WAY ROAD RELOCATION

Section 2 - 01 Page 43 of the document states:

*"The airport is privately-owned and therefore, the Airport Sponsor cannot exercise eminent domain. The Airport Sponsor can only acquire land if there is a willing seller. As such, any alternative must consider whether any residences or businesses would need to be acquired and/or relocated because of the alternative"*

Further in section 2 -4 2.2.1

*Alternative 1: Construct New 2,400-foot Runway, and Relocate AirportWay This group of alternatives, identified as the recommended development plan in the 2018 MP, would construct a runway 2,400 feet long by 75 feet wide to provide the minimum runway length needed to accommodate the critical aircraft grouping (B-II (small)) identified in the 2018 MP. Three new taxiway connectors would be constructed to provide access to the runway. Both alternatives in this group would shift the runway to the south to be far as possible from the existing BNSF railroad tracks and overhead powerlines. Both alternatives in this group would require relocating Airport Way south of the new Runway 33 end. All the pavement project components would remain on Airport property"*

- 1 The proposed road relocation of airport way in all of the alternatives has suggested a route directly on to my personal property and removal of the residency and destruction of my business. According to Snohomish County Code attached (SETBACK REQUIREMENTS 30.23.045 SCC.JPG) clearly states a minimum setback of 50 feet from structures under 60 feet height in AG 10 zoned land. Figures 2-1, 2-2, 2-3 and 2-4 do not account for the setback requirements for road construction. My home is located well within the setback

1 requirement and would therefore need to be destroyed in order to accommodate the suggested road location.

Also when referring to 2.4.1 Alternatives Screening Summary Table 2 - 3 (attached as "2.4 1 ALTERNATIVES SCREENING SUMMARY.JPG") the table clearly states that Airport Way is to Remain on Harvery Property and/or County-Owned Right - of - Way. When considering setback requirements this statement is false unless my property is acquired.

A map given to the County Marshland Flood Control District Commissioners in 2016 shows more of a realistic road width potential. See attached "jvation exhibit 3.jpg". This clearly shows that a road relocation east and north of my property would require the purchase of my property and business. In addition a road in a flood zone along this route would require culverts which are not noted on the draft EA.

## TOPIC 2: INCOMPLETE FLOOD DATA

2 Floods are a very common occurrence on this land.

The following is a link to a photo album of images from the 2006 flood:

[2006 Flood Photos](#)

The following is a link to a photo album of images from the 2009 flood:

[2009 Flood Photos](#)

These images can show the severe impact of floods in the last 20 years, where 99th Avenue has been feet underwater, yet the draft EA on page 3-74 appears to have selected the 500 year flood modeling as its BFE and the majority of soil studies were completed in June of 2023 where we received very little moisture at all.

The EA clearly defines a plan for flood water control under the new proposed runway, but it does not define the flood control plan of the proposed road relocation. Attached you will see the severity of floods from 2006 and 2009 in the area designated for the project, yet there is no mention of these events or plan to control the flow of water into the slough. If the road is to be relocated to the specified location there would be a significant impact on the ability for Hanson slough to collect and manage flood waters unless significant further study and planning is done.

## TOPIC 3: INCOMPLETE WILDLIFE DATA

3 Wildlife is prominent on my property as well as the Harveys. Migratory birds, songbirds, deer, bald eagles, hawks, rabbits, coyotes and many other species call this home. The designated area is also known to provide habitat for endangered salmon species as mentioned during high flooding. The EA provided does little to address the importance of preserving this habitat and the impact the project would have on such species. It is best summarized when the document states in 3-7 "formal wildlife surveys were not performed

- 3 as part of the analysis,”  
Wildlife preservation is incredibly important to me and many in this community.

#### TOPIC 4: RETENTION OF GRASS RUNWAY

- 4 The EA does little to nothing to address the importance of safety and training that the grass runway provides. The grass runway plays an essential role for our aviation community at Harvey Field, and removing it to widen the paved runway would impact pilot safety and training. Harvey has a very popular flight school training program with a great reputation for safety and experience. An essential part of that experience that new and training pilots have at Harvey is the grass runway, and has been since the beginning of the airport in 1944. To train pilots properly, it is important to understand as much as you can about how conditions can affect landing surfaces, and the grass runway at Harvey Field provides such insight in a safely controlled setting. Removing this runway would prevent many pilots of the general aviation community from the essential training necessary to land their aircraft safely. To preserve crucial safety training for the aviation community, I oppose the publicly listed improvements provided in the letter that may lead to the removal of the grass runway.

#### CONCLUSION:

- 5 The major problem that Harvey Field faces in any potential future changes is that the community understands that the Federal Aviation Administration and the Washington State Department of Transportation have a great interest in the expansion of Harvey Field. They believe there is an immediate need for further relief from the area's major airports. Harvey's location, in the eyes of these organizations, provides an ideal route. The local community and county repeatedly shot down this concept over the last 20 years. Becoming part of NPIAS has undoubtedly changed the position of Harvey Field's authority. However, it will
- 6 likely be met with even further backlash than it has ever seen before. Moving the road and changing the zoning of the land would give way to an opportunity for expansion and further flood destruction which is exactly what this community has been fighting against since it was originally proposed nearly 20 years ago.
- 7 Harvey Field should be removed from NPIAS and preserved in its current footprint as a local private airport for pilot training, skydiving, and hot-air ballooning. Government funding would be much wiser spent on expanding other neighboring airports, such as Arlington Municipal or Moses Lake Municipal, which face much fewer environmental and socioeconomic consequences.

Thank you for the opportunity to comment,

Andrew Carlson  
10612 99th Ave SE  
Snohomish, WA 98296

## Response to Commenter P-22

1. The proposed relocation of Airport Way is not expected to require the acquisition of land or the relocation or removal of any residences or businesses. The current alignment for Airport Way would use Snohomish County right of way and Harvey-owned property and meet all Snohomish County Code requirements. Culverts are proposed beneath relocated Airport Way along the primary flowpath for the drainage basin for Hanson Slough (see Figure 3-35 in the Final EA). The road alignment would be advanced during final design and permitting.
2. Section 1.1.3 has been added to the Final EA to provide an overview of flooding history, levees, and flood control improvements in the Study Area. Appendix I in the Final EA has been revised to include floodplain modeling for the Proposed Action. Floodplain modeling that was inclusive of airfield and roadway improvements indicates that the FEMA-established BFEs would not increase as a result of the Proposed Action for the regulatory 100-year (one percent-annual-chance) flood event. Non-regulatory flood events that are less than the FEMA-regulatory 100-year (1-percent-chance) flood event were also analyzed for potential changes in flood elevations in response to public comments received on the Draft EA and for informational purposes only. Additional floodplain modeling will be conducted in final design and the Proposed Action will be required to demonstrate that it does not contribute to a cumulative increase in BFEs that exceeds the limits prescribed in the Snohomish County Code 30.65 to obtain the County Flood Hazard Permit. Culverts are proposed along relocated Airport Way along the primary flowpath for the drainage basin for Hanson Slough (see Figure 3-35 in the Final EA). The Proposed Action also results in a net removal of material from the density fringe floodplain, resulting in increased flood storage.
3. A Biological Survey of the Study Area determined the area lacked multiple factors for favorable fish habitats. See Section 3.4.3.2 in the Final EA for more information. Impacts related to biological resources are addressed in Section 3.4 in the Final EA. Section 7 consultation with the National Marine Fisheries Service (NMFS)/U.S. Fish and Wildlife Service (USFWS) was ongoing at the time of the Draft EA publication. The USFWS issued a Letter of Concurrence on October 2, 2024, for the effects on bull trout and designated critical habitat (see Appendix C in the Final EA). However, NMFS held that the Proposed Action is likely to adversely affect Endangered Species Act (ESA)-listed salmonids, their critical habitat, and essential fish habitat for Pacific Coast salmon due to the effects from the pollutant 6PPD, and thus required formal consultation. Therefore, a revised BA was prepared and submitted to NMFS on September 5, 2024, with an adverse effect determination (see “NMFS Consultation” in Appendix C in the Final EA). NMFS issued their Biological Opinion on June 25, 2026. Section 7 consultation with both agencies (i.e., NMFS and USFWS) is summarized in Section 3.4.4 in the Final EA and Appendix C in the Final EA has been updated with the results of the consultation with these agencies.
4. The comment regarding opposition to removing the grass runway is noted.

5. The Proposed Action would not expand the Airport or its operations (i.e., would not change the number or type of aircraft currently operating at the Airport).
6. See response to Comment #2 for discussion of floodplain modeling. Section 3.11.4 in the Final EA describes how the Proposed Action would be compliant with County land use regulations. As stated in that section, the Airport Sponsor would coordinate with the County and apply for a Conditional Use Permit (CUP) or Development Agreement (DA) for the southern portion of the Study Area, which is currently zoned as Agriculture-10 Acre, to be consistent with County plans. Floodplain modeling, which considered both airfield and roadway improvements consistent with those described in the Proposed Action indicates that the FEMA-established BFEs would not increase as a result of the Proposed Action for the regulatory 100-year (one percent-annual-chance) flood event.
7. The comment regarding the Airport's inclusion in the National Plan of Integrated Airport Systems (NPIAS) and funding at other airports is noted.

## Commenter P-23

**From:** [Cindy Hendrickson](#)  
**To:** [Barrow, Julie](#)  
**Cc:** [Kandace Harvey](#)  
**Subject:** FW: Harvey Airport Project  
**Date:** Friday, May 24, 2024 4:01:29 PM

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-----Original Message-----

From: Dena VanDuine (Dena VanDuine) <denavanduine@gmail.com>  
Sent: Friday, May 24, 2024 2:37 PM  
To: Cindy Hendrickson <cyndyh@harveyfield.com>  
Cc: Charlcia Charlie Krabach <charliekay@windermere.com>  
Subject: Harvey Airport Project

Dear Cynthia,

- 1 Hi, my name is Dena VanDuine. I'm a real estate agent in the area. I wanted to share with you my concerns about the airport project. My biggest concern is for the community as this will create more noise, which would affect the
- 2 home owners value. It will also cause buyers to look elsewhere. Two deterrent in real estate are power-lines and
- 3 airports. I don't see how this airport extension would benefit anyone except for the owner wow , it would affect the entire community in a negative way. Affecting home prices and will. not bring in business for our small business owners on first Street. this airport extension will take away from our charming town.

If you have any questions, please reach out to me at 206 406 7717.

Please confirm confirm that you have received received this email in time for meeting

Dena VanDuine  
Sent from my iPhone

## Response to Commenter P-23

1. The comment regarding noise impacts is noted. As stated in Section 3.13.4 in the Final EA, the Proposed Action would decrease the noise exposure area by about 4 acres.
2. The Proposed Action's impacts on the real estate market are beyond the scope of the EA.
3. The Proposed Action would not expand the Airport or its operations (i.e., would not change the number or type of aircraft currently operating at the Airport). The runway at the Airport would decrease in length from its existing 2,672 feet to 2,400 feet.

## Commenter P-24

Date: May 24,2024(revised)

From: Doug Bates

To: Harvey Field Airport Manager: Cynthia Hendrickson

Topic: Harvey Field Runway Improvement Project Environmental Assessment (EA)

- 1 Clarification: The purpose of this project is to make Harvey Field compliant with the current FAA guidelines. The FAA representative stated that the Airport as laid out today can operate as it does today with no closure or reconfiguration needed. The current guidelines allow B2 aircraft to land/take off with weight restrictions. Otherwise, as Harvey Field sits today Harvey Field can operate as it has been for 80 years or so **without** any site improvements at all.

As a local resident since 2001 and a Construction and Development Manger for over 30 years I was both surprised and shocked by the "Open House" presentation of your project as presented on May 14, 2024.

Having been involved with Public Review Presentations throughout my career, I have never been so confused with the multiple station foam board type presentation, with much of the information fragmented or non-existent during this open house. Usually there is formal introduction of the project by the owner or their representative, as well as introduction of the team members present at these meetings. None was done here.

That left all in attendance to ask each team member separately the same questions to try to get straight forward replies. Most of these replies were incomplete or not available as the **actual** person to address them were not even present. Even the available single page handout (8 ½ x 11) showing only the existing airfield conditions created more questions than answers. Why wasn't the Proposed New Improvements and layout included as a handout too? **This suggests that you are trying to hide or not share important project info about your project with the public.**

A very hot topic of concern was brought to the lead presenters' attention by myself and others, only to hear from the FAA rep, Consultant firm Lead, and the Airport owner herself, that they were not aware of the Port of Everetts action to get ALL of Snohomish County included in their Tax District so that we the citizens who live here will get taxed for improvements that get done for the Airport Project now and in the future. Rumored comments by the Port of Everett lead have suggested that they could provide all new road fill material for the relocated Airport Way project.

This proposed project benefits the Airport Owner Directly and nobody else! Using Federal funds and Port of Everett funding by Taxing all in Snohomish County including All in Snohomish for a private airport venture is very troubling! More Air and Ground Traffic, disregard for existing storm overflow runoff areas, more pressure on Police and Fire responses, added overhead noise and ultimately more crime that commonly follows new development seam to be all that the City of Snohomish and surrounding community gains. What does the City of Snohomish think about this project and Public Works components of it? Again, no comments by the group on this.

I chose to reside in this small Historic treasure of a town in 2001 to leave the heavy urban Seattle area and all the negatives that thrive there. The proposed Harvey Airport Project ultimately threatens this Historic Towns core and I will not stand by and let the will and whim of one single airport owner, continue with plans to destroy this special place. She has tried this previously and appears to be ignoring the public and professional dialogue provided on these well documented issues once again.

Doug Bates

417 Ave E

Snohomish, WA 98290

425 577-0415

doubat0422@gmail.com

## Response to Commenter P-24

1. *NOTE: This comment correspondence includes one revision from a previously submitted comment correspondence (see the Response to Commenter P-21 for the original comments). Only the revised comment is included here.*

While the commenter is correct in noting that Harvey Field could continue to operate with no improvements, the Proposed Action seeks to enhance safety by addressing nonstandard conditions at the Airport.

## Commenter P-25

**From:** [Cyndy Hendrickson](#)  
**To:** [Barrow, Julie](#)  
**Cc:** [Kandace Harvey](#)  
**Subject:** FW: EA comments for Harvey Airfield Runway and Re-route of Airport Way into Hanson Slough  
**Date:** Friday, May 24, 2024 6:02:29 PM

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**From:** Pat Phillips <patphillips123@gmail.com>  
**Sent:** Friday, May 24, 2024 5:00 PM  
**To:** Cyndy Hendrickson <cyndyh@harveyfield.com>  
**Subject:** EA comments for Harvey Airfield Runway and Re-route of Airport Way into Hanson Slough

1

No Thank You! Love Much Janet Satko!





## Response to Commenter P-25

1. The commenter's opposition to the Proposed Action is noted.

# Commenter P-26

**From:** [Cindy Hendrickson](#)  
**To:** [Christine Nichols](#)  
**Subject:** FW: Harvey Field video of May 14, 2024 meeting  
**Date:** Tuesday, May 21, 2024 5:03:38 PM  
**Attachments:** [image001.png](#)  
[image002.png](#)

Julie,

Can you please assist with the below questions being ask?

Thanks,

[Cynthia Hendrickson](#)  
Airport Manager | Harvey Field, Inc.  
9800 Airport Way | Snohomish, WA 98296  
Phone: 360.568.1541 x229 | Fax: 360.568.6034  
[www.harveyfield.com](#) | [www.snohomishfly.com](#)



**From:** Christine Wakefield-Nichols <[christ@wakefieldnichols.com](mailto:christ@wakefieldnichols.com)>  
**Sent:** Tuesday, May 21, 2024 4:21 PM  
**To:** Cindy Hendrickson <[cyndyh@harveyfield.com](mailto:cyndyh@harveyfield.com)>  
**Subject:** RE: Harvey Field video of May 14, 2024 meeting

Ok, I pulled them up. Not sure what happened earlier. I do with there was a video of either the meeting in Dec. of 2022, or this last meeting, just so that I could review the presentation, but just a few questions:

- 1 **• The 20-year airport master plan, is that required by the State, or the Feds?**
- 2 **• It appears you had an outside consultant in Denver assist with the plan? I see that you say nonstandard conditions for the existing runway were identified. I think I saw something about obstructions but not sure what they were. Could you explain the nonstandard conditions?**
- 3 **• Scoping and its benefits. Do you mean scoping, i.e. make it bigger? I am not sure what that means, can you explain briefly?**
- 4 **• Purpose and Need – you say that it is: To safely and efficiently accommodate current and projected aviation activity at Harvey Field by meeting current FAA design standards for Runway 15L/33R for B-II aircraft by correcting the runway width, runway and taxiway separation distance, and runway protection zones (RPZs).**

Are B-11 aircraft a new type of aircraft from what you have traditionally had flying at your field?

If so, it sounds like this is an expansion plan and that you are simply asking the county to expand what you are allowed to do, to accommodate different planes, is that correct?

5 I read in the earlier issue of the Tribune that you needed to do these things to be able to qualify for federal grants when available to assist with your operation. That part I understand. But this looks a bit different than that. I am just trying to understand what is driving this project, and also to get a clear picture of the changes that you feel you need to make to the surrounding roadways to achieve this expansion plan.

Very sincerely,

Christine Wakefield Nichols, MSW  
Family Law Guardian ad Litem, Title 11 Court Visitor  
C/O 330 Ave B  
Snohomish, WA 98290  
phone 360-563-0622 & fax 360-862-1229  
[christ@wakefieldnichols.com](mailto:christ@wakefieldnichols.com)

**From:** Cindy Hendrickson <[cyndyh@harveyfield.com](mailto:cyndyh@harveyfield.com)>  
**Sent:** Tuesday, May 21, 2024 3:28 PM  
**To:** Christine Wakefield-Nichols <[christ@wakefieldnichols.com](mailto:christ@wakefieldnichols.com)>  
**Subject:** RE: Harvey Field video of May 14, 2024 meeting

Hello Christine,

I was able to view the Public Meeting Boards, you might try again.



[Home](#) [Public & Agency Involvement](#) [Documents & Displays](#)

## Draft Environmental Assessment

- [Draft Environmental Assessment Notice](#)
- [Draft Environmental Assessment \(PDF\)](#)
- [Appendix A - Federal Aviation Administration Standards Relevant to Proposed Action \(PDF\)](#)
- [Appendix B - Air Quality Analysis \(PDF\)](#)
- [Appendix C - Biological Resources \(PDF\)](#)
- [Appendix D - Coastal Resources \(PDF\)](#)
- [Appendix E - Cultural Resources \(PDF\)](#)
- [Appendix F - Farmlands \(PDF\)](#)
- [Appendix G - Aircraft Noise Analysis \(PDF\)](#)
- [Appendix H - Wetlands \(PDF\)](#)
- [Appendix I - Water Resources \(PDF\)](#)
- [Appendix J - Scoping Report \(PDF\)](#)

## Draft Environmental Assessment Public Meeting

- [Draft Environmental Assessment Meeting Boards \(PDF\)](#)

Kind Regards,

[Cynthia Hendrickson](#)  
Airport Manager | Harvey Field, Inc.  
9800 Airport Way | Snohomish, WA 98296  
Phone: 360.568.1541 x229 | Fax: 360.568.6034  
[www.harveyfield.com](#) | [www.snohomishfly.com](#)



**From:** Christine Wakefield-Nichols <[christ@wakefieldnichols.com](mailto:christ@wakefieldnichols.com)>  
**Sent:** Tuesday, May 21, 2024 3:09 PM  
**To:** Cindy Hendrickson <[cyndyh@harveyfield.com](mailto:cyndyh@harveyfield.com)>  
**Subject:** RE: Harvey Field video of May 14, 2024 meeting

Hi Cynthia. Bummer, that's too bad. I tried to open the scoping meeting boards and kept getting an error message. Maybe you could send them to me.

Thanks.

**From:** Cindy Hendrickson <[cyndyh@harveyfield.com](mailto:cyndyh@harveyfield.com)>  
**Sent:** Tuesday, May 21, 2024 3:07 PM  
**To:** Christine Wakefield-Nichols <[christ@wakefieldnichols.com](mailto:christ@wakefieldnichols.com)>  
**Subject:** RE: Harvey Field video of May 14, 2024 meeting

Hi Christine,

There is no video or audio of the public meeting. However, the scoping meeting boards have been uploaded to the Harvey Field website.  
[www.harveyfield.com](#)

Kind Regards,

[Cynthia Hendrickson](#)  
Airport Manager | Harvey Field, Inc.  
9800 Airport Way | Snohomish, WA 98296  
Phone: 360.568.1541 x229 | Fax: 360.568.6034  
[www.harveyfield.com](#) | [www.snohomishfly.com](#)



**From:** Christine Wakefield-Nichols <[christ@wakefieldnichols.com](mailto:christ@wakefieldnichols.com)>  
**Sent:** Tuesday, May 21, 2024, 1:29 PM  
**To:** Cindy Hendrickson <[cyndyh@harveyfield.com](mailto:cyndyh@harveyfield.com)>  
**Subject:** Harvey Field video of May 14, 2024, meeting

Good morning Cynthia,

I am interested in viewing a video of last weeks public meeting on Harvey Field. If the video or audio is available, please send.

Thanks

Christine Wakefield Nichols, MSW  
Family Law Guardian ad Litem, Title 11 Court Visitor  
C/O 330 Ave B  
Snohomish, WA 98290  
phone 360-563-0622 & fax 360-862-1229  
[chris@wakefieldnichols.com](mailto:chris@wakefieldnichols.com)

## Response to Commenter P-26

1. More information on the 2018 Master Plan is available online on the Airport website at <http://sites.jviation.com/harveyfield/2018-documents.html>.
2. The nonstandard conditions are described in Section 1.4.2 in the Final EA and in further detail in Appendix A. The obstructions are described in Section 1.4.2.1 in the Final EA.
3. The scoping process takes place early in the EA process to gather input from interested agencies and members of the public to understand the concerns related to the Proposed Action.
4. Section 1.3.1 in the Final EA discusses the critical aircraft group at the Airport, which is Aircraft Design Group II (small) and includes a range of aircraft types within that group beyond the Cessna Caravan. The Aircraft Design Group would not change because of the Proposed Action. The Proposed Action would not expand the Airport or its operations (i.e., would not change the number or type of aircraft currently operating at the Airport). The runway at the Airport would decrease in length from its existing 2,672 feet to 2,400 feet.
5. The Proposed Action is being undertaken to meet current FAA standards as defined by the FAA in Advisory Circular (AC) 150/5300-13B, *Airport Design*.

## Commenter P-27

**From:** [Cyndy Hendrickson](#)  
**To:** [Barb Bailey](#)  
**Cc:** [Barrow, Julie](#)  
**Subject:** RE: Jviation 2018 Airport Master Plan  
**Date:** Monday, May 20, 2024 10:05:11 AM  
**Attachments:** [image001.png](#)

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Hi Barb,

The 2018 Master Plan Documents are available on the Harvey Field website.

[www.harveyfield.com](http://www.harveyfield.com)

Kind Regards,

*Cynthia Hendrickson*  
Airport Manager | Harvey AirField, Inc.  
9900 Airport Way | Snohomish, WA 98296  
Phone: 360.568.1541 x229 | Fax: 360.568.6034  
[www.harveyfield.com](http://www.harveyfield.com) | [www.snohomishflying.com](http://www.snohomishflying.com)



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**From:** Barb Bailey <barbarabailey55@gmail.com>  
**Sent:** Saturday, May 18, 2024, 11:30 AM  
**To:** julie.barrow@rsandh.com; Cyndy Hendrickson <cyndyh@harveyfield.com>  
**Subject:** Jviation 2018 Airport Master Plan

1 Hi, I am reading through the Draft EA again and see many references to the Jviation 2018 Airport Master Plan and Appendixes. Where is that document available?

Thanks,  
Barbara Bailey

## Response to Commenter P-27

1. The 2018 Master Plan is available online on the Airport website at <http://sites.jviation.com/harveyfield/2018-documents.html>.

**Commenter P-28**

May 23, 2024

Ms. Cynthia Hendrickson  
Airport Manager  
9900 Airport Way  
Snohomish, Washington, 98296

Re: Harvey Field Runway Improvement Project Environmental Assessment

Dear Ms. Hendrickson:

- 1 Most of the negative comments to the airfield project refer to flooding, especially the 1990 flood that broke through the Marshland dike at Batts Slough. The flood in 1990 revealed some major flaws in the dike system of the Snohomish River lying North of the Fiddlers Bluff area and downstream to Puget Sound. Before permanent repairs were made to Marshland and French Creek dikes, all the Flood Control districts in the Snohomish River floodplain signed an agreement to modify the dikes so that all of the dikes would overtop at the same level and not concentrate flows into small areas that resulted in dike failures in those areas. South of Batts Slough approximately 3000 ft. of the dike was lowered 18 inches. Directly in front of Kurt Thompson's house approximately 500 ft. of the dike was raised to the same level as the rest of the dike. The levels of the dikes on both sides of the river are now the same and in a major flood event there is equal overtopping along the entire dike system on both sides of the river.
- 2 There was a significant flood in 2008 that caused very little if any damage. This was not the case during or prior to the 1990 flood. Harvey Field did not cause the dike failure during the 1990 flood and will not harm the dikes in the future. What is being planned will actually improve flood water flows through the Hanson Slough area.

Sincerely,



John Misich  
Former Marshland Commissioner and long time Marshland farmer

## Response to Commenter P-28

1. The commenter's background information regarding Marshland's history with drainage issues in the area is noted. Section 1.1.3 has been added to the Final EA to provide an overview on flooding history, levees, and flood control improvements in the Study Area. The levees along the Snohomish River are built to be a consistent 1-foot above the 5-year (20% annual chance) flood elevation.
2. The commenter's support of the Proposed Action is noted. Section 1.1.3 has been added to the Final EA to provide an overview of flooding history, levees, and flood control improvements in the Study Area. The Proposed Action also results in a net removal of material in the density fringe floodplain, resulting in increased flood storage.



# Harvey Field Runway Improvement Project Environmental Assessment (EA)

## Comment Form

Use the space below to write in a comment and drop it in the comment box. Refer to the other side of this handout for other ways to comment. Comments on the Draft EA will be accepted until 5:00 p.m. Pacific Daylight Time (PDT) May 24, 2024 and will be part of the official project record.

### Comments

1

I FAIL TO SEE ANY POSSIBLE BENEFIT TO THE SNOHOMISH COMMUNITY AT LARGE. I VALUE HAVING THE AIRPORT AS PART OF SNOHOMISH.

2

THIS PROJECT WILL CHANGE THE FLOOD PLAIN.

3

IT WILL INCREASE TRAFFIC DURING CONSTRUCTION ONCE COMPLETE TRAFFIC WILL NOT IMPROVE.

4

WHY WOULD I WANT TO APPROVE A PROJECT FOR A FEW WHEN THERE IS ~~NO~~ NOTHING TO BE GAINED?

Before including your address, email, or other personal identifying information, be advised that your personal identifying information may be made publicly available at any time. While you can ask us to withhold from public review your personal identifying information, we cannot guarantee that we will be able to do so. Written requests to withhold personal information may be mailed to: Cynthia Hendrickson, Airport Manager, 9900 Airport Way, Snohomish, WA, 98296.

### Contact Information

Name: JOHN FIRST

Representing agency, org, business: \_\_\_\_\_

Address: \_\_\_\_\_

Email/Phone: JOHNFIRST@YAHOO.COM

**Comments are not limited to this form. Please attach any additional sheets necessary.**

# Harvey Field Runway Improvement Project Environmental Assessment (EA)



## What's happening?

Harvey Field (the Airport) is a privately owned, public use, general aviation reliever airport. An Airport Master Plan completed in 2018 identified projects needing to comply with current Federal Aviation Administration (FAA) standards. Proposed improvements include, but are not limited to:

- Changing from a two parallel runway system (one paved and one grass) to one paved runway
- Constructing a 2,400-foot asphalt runway 75 feet wide
- Removing the existing runway and constructing a new parallel taxiway
- Installing a retaining wall with water passage infrastructure (i.e., box culverts)
- Relocating Airport Way
- Relocating navigational aids and runway/taxiway lighting and fencing



## How to participate

Comments on the Draft EA will be accepted **until 5:00p.m. Pacific Daylight Time (PDT) May 24, 2024**, and will be part of the official project record.

## How to comment

- **In person:** A stenographer is available to record comments, or you can submit a handwritten comment using the other side of this page. Place handwritten comments in the comment box or give them to a project team member at the meeting.
- **Email:** Comments may be sent to Cynthia Hendrickson, Airport Manager, [cyndyh@harveyfield.com](mailto:cyndyh@harveyfield.com)
- **Mail:** Handwritten comments may be mailed to: Cynthia Hendrickson, Airport Manager, 9900 Airport Way, Snohomish, WA, 98296
- **Project website:** Submit comments on the website at: [harveyfieldimprovements.com](http://harveyfieldimprovements.com)
- **QR code:** Hold your smartphone or tablet camera over the image at right to access the website.



The FAA is the lead federal agency for preparation of the EA in compliance with NEPA as amended (42 United States Code [U.S.C.] § 4321 et seq.) and Council on Environmental Quality (CEQ) Regulations for Implementing the Procedural Provisions of NEPA (40 Code of Federal Regulations Parts 1500-1508), FAA Order 1050.1F: Environmental Impacts: Policies and Procedures, FAA Order 5050.4B: NEPA Implementing Instructions for Airport Actions, and other applicable local, state, and Federal laws.

## Response to Commenter P-29

1. The Proposed Action seeks to enhance safety by addressing nonstandard conditions at the Airport. Additionally, relocating Airport Way would move the road further from the end of the runway, thereby enhancing safety for the road and Airport users alike. Further, and as stated in Section 3.14.3.3 in the Final EA, the relocated road would include dedicated shoulders and bicycle lanes, of which do not occur on the existing Airport Way. Enhancing safety and providing shoulders and bicycle lanes are considered to be public benefits to the public commenters who have asked for shoulders and bicycle lanes.
2. Impacts related to flooding are addressed in Section 3.16.2 in the Final EA. The Final EA has been revised to include floodplain modeling for the Proposed Action. Floodplain modeling that was inclusive of airfield and roadway improvements indicates that the FEMA-established BFEs would not increase as a result of the Proposed Action for the regulatory 100-year (one percent-annual-chance) flood event.
3. The Proposed Action would not increase operations at the Airport, and would not generate additional vehicle trips; therefore, additional capacity to Airport Way is not proposed. The existing route of Airport Way would remain operational while the realignment of Airport Way is constructed. The proposed relocation would take place during the first construction year.
4. The commenter's opposition to the Proposed Action is noted.



# Harvey Field Runway Improvement Project Environmental Assessment (EA)

## Comment Form

Use the space below to write in a comment and drop it in the comment box. Refer to the other side of this handout for other ways to comment. Comments on the Draft EA will be accepted until 5:00 p.m. Pacific Daylight Time (PDT) May 24, 2024 and will be part of the official project record.

### Comments

- 1 Using public money to subsidize A PRIVATE ENTERPRISE WITH NO ACCOUNTABILITY IS UNDEMOCRATIC.
- 2 B Where Are the public meetings?
- 3 What will happen to commuter TRAFFIC?
- 4 An Airport expansion is not wanted by the majority of Residents.
- 5 If Mrs. Harvey's business is not compliant with FAA regulations her business should be shut down.
- 6 extending the ROAD into the flood plain is not sensible.

Before including your address, email, or other personal identifying information, be advised that your personal identifying information may be made publicly available at any time. While you can ask us to withhold from public review your personal identifying information, we cannot guarantee that we will be able to do so. Written requests to withhold personal information may be mailed to: Cynthia Hendrickson, Airport Manager, 9900 Airport Way, Snohomish, WA, 98296.

### Contact Information

Name: Jolie Garner

Representing agency, org, business: Resident

Address: 415 9th St. Snohomish, WA

Email/Phone: 360 348 0377

**Comments are not limited to this form. Please attach any additional sheets necessary.**

# Harvey Field Runway Improvement Project Environmental Assessment (EA)



## What's happening?

Harvey Field (the Airport) is a privately owned, public use, general aviation reliever airport. An Airport Master Plan completed in 2018 identified projects needing to comply with current Federal Aviation Administration (FAA) standards. Proposed improvements include, but are not limited to:

- Changing from a two parallel runway system (one paved and one grass) to one paved runway
- Constructing a 2,400-foot asphalt runway 75 feet wide
- Removing the existing runway and constructing a new parallel taxiway
- Installing a retaining wall with water passage infrastructure (i.e., box culverts)
- Relocating Airport Way
- Relocating navigational aids and runway/taxiway lighting and fencing



## How to participate

Comments on the Draft EA will be accepted **until 5:00p.m. Pacific Daylight Time (PDT) May 24, 2024**, and will be part of the official project record.

## How to comment

- **In person:** A stenographer is available to record comments, or you can submit a handwritten comment using the other side of this page. Place handwritten comments in the comment box or give them to a project team member at the meeting.
- **Email:** Comments may be sent to Cynthia Hendrickson, Airport Manager, [cyndyh@harveyfield.com](mailto:cyndyh@harveyfield.com)
- **Mail:** Handwritten comments may be mailed to: Cynthia Hendrickson, Airport Manager, 9900 Airport Way, Snohomish, WA, 98296
- **Project website:** Submit comments on the website at: [harveyfieldimprovements.com](http://harveyfieldimprovements.com)
- **QR code:** Hold your smartphone or tablet camera over the image at right to access the website.



The FAA is the lead federal agency for preparation of the EA in compliance with NEPA as amended (42 United States Code [U.S.C.] § 4321 et seq.) and Council on Environmental Quality (CEQ) Regulations for Implementing the Procedural Provisions of NEPA (40 Code of Federal Regulations Parts 1500-1508), FAA Order 1050.1F: Environmental Impacts: Policies and Procedures, FAA Order 5050.4B: NEPA Implementing Instructions for Airport Actions, and other applicable local, state, and Federal laws.

## Response to Commenter P-30

1. As stated in Section 1.2.1 in the Final EA, the Airport is designated by the Federal Aviation Administration (FAA) as a reliever airport in the National Plan of Integrated Airport Systems (NPIAS), thereby allowing it to receive federal funding. The funding for the Proposed Action is through the FAA's Airport Improvement Program (AIP). Airports within the National Plan of Integrated Airport Systems (NPIAS) are eligible for AIP funds. Harvey Field is in the NPIAS and, thus, is eligible for AIP funds. Funds obligated for the AIP are drawn from the Airport and Airway Trust fund, which is supported by several aviation-user taxes on such items as airline fares, air freight, and aviation fuel. The past and current AIP grants awarded to Harvey Field do not include taxpayer money from the general fund of the U.S. Treasury.
2. Scoping meetings open to the public were held on December 1, 2022. There was a public open house for the Draft EA where this comment was submitted that took place on May 14, 2024. Both public meetings took place at Harvey Field, Hangar 15 Event Center, 9900 Airport Way, Snohomish, WA 98296.
3. The Proposed Action would not increase the aviation activity at the Airport beyond what is currently forecasted. Therefore, there would be no changes in the level of service (LOS) Airport Way currently provides. The purpose of the proposed Airport Way relocation is not to improve LOS, but to provide a greater separation distance between the runway end and the road. Due to the lack of additional vehicle trips being generated with the Proposed Action, as well as the proposal for the relocated Airport Way to tie into the existing intersection of Marsh Road/Springhetti Road, initial coordination with the County was that a traffic study would not be needed. However, the Airport Sponsor would attend a Traffic Pre-submittal Conference with the County during final design, as recommended by the County.
4. The Proposed Action would not expand the Airport or its operations (i.e., would not change the number or type of aircraft currently operating at the Airport). The runway at the Airport would decrease in length from its existing 2,672 feet to 2,400 feet.
5. The comment regarding closing the Airport is noted.
6. The proposed relocation of Airport Way has been deemed a public work project by Snohomish County exempting it from the density fringe regulations (Appendix I in the Final EA provides correspondence with the County to this effect). Appendix I in the Final EA has been revised to include floodplain modeling for the Proposed Action. Floodplain modeling that was inclusive of airfield and roadway improvements indicate that the FEMA-established BFEs would not increase as a result of the Proposed Action for the regulatory 100-year (one percent-annual-chance) flood event. Culverts are proposed beneath relocated Airport Way along the primary flowpath for the drainage basin for Hanson Slough (see Figure 3-35 in the Final EA). The Proposed Action also results in a

net removal of material in the density fringe floodplain, resulting in increased flood storage.



# Harvey Field Runway Improvement Project Environmental Assessment (EA)

## Comment Form

Use the space below to write in a comment and drop it in the comment box. Refer to the other side of this handout for other ways to comment. Comments on the Draft EA will be accepted until 5:00 p.m. Pacific Daylight Time (PDT) May 24, 2024 and will be part of the official project record.

### Comments

- 1 While wetland and floodplane concerns are better addressed with this version of the plan (many details are still not settled) I still am NOT in favor of this project going forward.
- 2 Since the FAA is NOT requiring this expansion it is only saying what requirements would be IF the airport were expanded,
- 3 the disruption to traffic and the risk of impacting <sup>soil</sup> farmland are too high a price to pay for this optional project.
- 4 There are two regional airports closeby - Paine and Arlington - there is no pressing need to move forward with this project. It is a use of tax payer money for the purpose of furthering a project initiated by the Airport Owner. To be clear, the FAA did not initiate this project and will not shut down the airport if it remains as is, a thriving asset to our community servicing emergency & recreational planes + helicopters & balloons.

Before including your address, email, or other personal identifying information, be advised that your personal identifying information may be made publicly available at any time. While you can ask us to withhold from public review your personal identifying information, we cannot guarantee that we will be able to do so. Written requests to withhold personal information may be mailed to: Cynthia Hendrickson, Airport Manager, 9900 Airport Way, Snohomish, WA, 98296.

### Contact Information

Name: Candace McKenna  
 Representing agency, org, business: Self  
 Address: 425 - 9th Snohomish, WA 98290  
 Email/Phone: candace.mckenna7@hotmail.com (425) 308-8168

Comments are not limited to this form. Please attach any additional sheets necessary.

# Harvey Field Runway Improvement Project Environmental Assessment (EA)



## What's happening?

Harvey Field (the Airport) is a privately owned, public use, general aviation reliever airport. An Airport Master Plan completed in 2018 identified projects needing to comply with current Federal Aviation Administration (FAA) standards. Proposed improvements include, but are not limited to:

- Changing from a two parallel runway system (one paved and one grass) to one paved runway
- Constructing a 2,400-foot asphalt runway 75 feet wide
- Removing the existing runway and constructing a new parallel taxiway
- Installing a retaining wall with water passage infrastructure (i.e., box culverts)
- Relocating Airport Way
- Relocating navigational aids and runway/taxiway lighting and fencing



## How to participate

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## How to comment

- **In person:** A stenographer is available to record comments, or you can submit a handwritten comment using the other side of this page. Place handwritten comments in the comment box or give them to a project team member at the meeting.
- **Email:** Comments may be sent to Cynthia Hendrickson, Airport Manager, [cyndyh@harveyfield.com](mailto:cyndyh@harveyfield.com)
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- **Project website:** Submit comments on the website at: [harveyfieldimprovements.com](http://harveyfieldimprovements.com)
- **QR code:** Hold your smartphone or tablet camera over the image at right to access the website.



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## Response to Commenter P-31

1. The comment's opposition to the Proposed Action is noted. As described in Section 3.16.1 in the Final EA, the type, location, and amount of mitigation required as compensation for wetland impacts will be determined during final design and permitting. Impacts related to flooding are addressed in Section 3.16.2 in the Final EA. Appendix I in the Final EA has been revised to include floodplain modeling for the Proposed Action. Floodplain modeling that was inclusive of airfield and roadway improvements indicate that the FEMA-established BFEs would not increase as a result of the Proposed Action for the regulatory 100-year (one percent-annual-chance) flood event.
2. The Proposed Action would not expand the Airport or its operations (i.e., would not change the number or type of aircraft currently operating at the Airport). The runway at the Airport would decrease in length from its existing 2,672 feet to 2,400 feet.
3. The Proposed Action would not increase operations at the Airport and would not generate additional vehicle trips. Section 3.8.4.2 in the Final EA describes the impacts to farmlands that would occur as a result of the Proposed Action. Farming activities would still occur on Harvey-owned property. Additionally, as stated in the Final EA, the Airport Sponsor coordinated with the U.S. Department of Agriculture Natural Resources Conservation Service for the farmlands using the Form AD-1006, Farmland Conversion Impact Rating. It was determined through Form AD-1006 that the Proposed Action would have no significant impact on farmlands because the combined score was 147 points, which is below the significant impact threshold of 200 points. Impacts related to biological resources are addressed in Section 3.4 in the Final EA. Section 7 consultation with the National Marine Fisheries Service (NMFS)/U.S. Fish and Wildlife Service (USFWS) was ongoing at the time of the Draft EA publication. The USFWS issued a Letter of Concurrence on October 2, 2024, for the effects on bull trout and designated critical habitat (see Appendix C in the Final EA). However, NMFS held that the Proposed Action is likely to adversely affect Endangered Species Act (ESA)-listed salmonids, their critical habitat, and essential fish habitat for Pacific Coast salmon due to the effects from the pollutant 6PPD, and thus required formal consultation. Therefore, a revised BA was prepared and submitted to NMFS on September 5, 2024, with an adverse effect determination (see "NMFS Consultation" in Appendix C in the Final EA). NMFS issued their Biological Opinion on June 26, 2025. Section 7 consultation with both agencies (i.e., NMFS and USFWS) is summarized in Section 3.4.4 in the Final EA and Appendix C in the Final EA has been updated with the results of the consultation with these agencies.
4. As stated in Section 1.2.1 in the Final EA, the Airport is designated by the Federal Aviation Administration (FAA) as a reliever airport in the National Plan of Integrated Airport Systems (NPIAS). The funding for the Proposed Action is through the FAA's Airport Improvement Program (AIP). Airports within the NPIAS are eligible for AIP funds. Harvey Field is in the NPIAS and, thus, is eligible for AIP funds. Funds obligated for the AIP are drawn from the Airport and Airway Trust fund, which is supported by several

aviation-user taxes on such items as airline fares, air freight, and aviation fuel. The past and current AIP grants awarded to Harvey Field do not include taxpayer money from the general fund of the U.S. Treasury. The commenter's preference for the No Action Alternative is noted.

# Harvey Field Runway Improvement Project Environmental Assessment (EA)



## Comment Form

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### Comments

1. I will need to have an evaluation of  
The FAA determined statement about  
adverse affecting of water wildlife

2. The issue of the Road relocation will need further  
review by the Snohomish County Council.

3. I am interested in ~~the~~ bodies responsible  
to the Snohomish County voters  
having the final say. Voting not for

Before including your address, email, or other personal identifying information, be advised that your personal identifying information may be made publicly available at any time. While you can ask us to withhold from public review your personal identifying information, we cannot guarantee that we will be able to do so. Written requests to withhold personal information may be mailed to: Cynthia Hendrickson, Airport Manager, 9900 Airport Way, Snohomish, WA, 98296.

### Contact Information

Name: Mark Miller

Representing agency, org, business: \_\_\_\_\_

Address: 415-9th St. Snohomish, WA 98298

Email/Phone: nashotah79@comcast.net 425-299-2111

**Comments are not limited to this form. Please attach any additional sheets necessary.**

# Harvey Field Runway Improvement Project Environmental Assessment (EA)



## What's happening?

Harvey Field (the Airport) is a privately owned, public use, general aviation reliever airport. An Airport Master Plan completed in 2018 identified projects needing to comply with current Federal Aviation Administration (FAA) standards. Proposed improvements include, but are not limited to:

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- Installing a retaining wall with water passage infrastructure (i.e., box culverts)
- Relocating Airport Way
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## How to participate

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## Response to Commenter P-32

1. Impacts to wildlife are discussed in Section 3.4 in the Final EA. Section 7 consultation with the National Marine Fisheries Service (NMFS)/U.S. Fish and Wildlife Service (USFWS) was ongoing at the time of the Draft EA publication. The USFWS issued a Letter of Concurrence on October 2, 2024, for the effects on bull trout and designated critical habitat (see Appendix C in the Final EA). However, NMFS held that the Proposed Action is likely to adversely affect Endangered Species Act (ESA)-listed salmonids, their critical habitat, and essential fish habitat for Pacific Coast salmon due to the effects from the pollutant 6PPD, and thus required formal consultation. Therefore, a revised BA was prepared and submitted to NMFS on September 5, 2024, with an adverse effect determination (see “NMFS Consultation” in Appendix C in the Final EA). NMFS issued their Biological Opinion on June 26, 2025. Section 7 consultation with both agencies (i.e., NMFS and USFWS) is summarized in Section 3.4.4 in the Final EA and Appendix C in the Final EA has been updated with the results of the consultation with these agencies.
2. The purpose of the proposed Airport Way relocation is not to improve LOS, but to provide a greater separation distance between the runway end and the road. Due to the lack of additional vehicle trips being generated with the Proposed Action, as well as the proposal for the relocated Airport Way to tie into the existing intersection of Marsh Road/Springhetti Road, initial coordination with the County was that a traffic study would not be needed. However, the Airport Sponsor would attend a Traffic Pre-submittal Conference with the County during final design, as recommended by the County.
3. The comment regarding having the citizens voting on the Proposed Action is noted.

# Harvey Field Runway Improvement Project Environmental Assessment (EA)



## Comment Form

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### Comments

1

I don't know who "Ann" is but she didn't want to give me her name and seems to be "lurking" around trying to pick up on feelings and concerns. A little creepy!

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### Contact Information

Name: \_\_\_\_\_

Representing agency, org, business: \_\_\_\_\_

Address: \_\_\_\_\_

Email/Phone: \_\_\_\_\_

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## Response to Commenter P-33

1. The comment regarding staff at the Public Open house is noted.

HARVEY FIELD RUNWAY IMPROVEMENT PROJECT  
SCOPING MEETING

PUBLIC COMMENTS

May 14, 2024

Snohomish, Washington

REPORTER: KATIE A. ESKEW, CCR, RPR

Harvey Field Runway Improvement Project

Scoping meeting

Tuesday, May 14, 2024

6:00 p.m.

9900 Airport Way, Snohomish, Washington

Reported By: KATIE A. ESKEW, CCR, RPR.

--o0o--

PUBLIC COMMENT NO. 1: Karyn King.

KARYN KING: Let's see. I've been coming to Harvey Field for 20 years, I think. I consider it my home. People here are like my family, except they don't fight -- better than family -- friends, and always have been very helpful, accommodating.

And what they're doing here is remarkable. I'm stunned that they have put this well-thought-out plan together with how many organizations? -- ten different organizations, each one of which is difficult to deal with, I'm just saying.

But they've managed to pull it all together. And it's very impressive. And I'm glad to be part of it. Any way I can support this, let me know. And I'm thrilled.

Okay. I might think of something later.

\*\*\*\*

1 PUBLIC COMMENT NO. 2: JOE GRIFFITH.

2 JOE GRIFFITH: I've been involved  
3 probably in 15 master-planning efforts at various  
4 airfields over the last 50 years. This is a good one,  
5 plan looks feasible, and probably long overdue for Harvey  
6 Field. Big supporter of it. I think they've done a good  
7 job. And I'm sure it will result in a much more  
8 user-friendly airfield in the long run.

9 KARYN KING: And safer.

10 JOE GRIFFITH: Very likely safer, as  
11 well.

12 KARYN KING: With the removal of the  
13 trees, it's going to be much safer. Those have troubled  
14 me for years.

15 JOE GRIFFITH: You are really close to  
16 the trees on that end when you turn final in.

17 KARYN KING: The traffic. But that's  
18 why I started my lessons here, because it was the  
19 hardest, the most difficult airport for takeoff and  
20 landing. Because if I can do this, I can anything. And  
21 that's why I started my lessons here.

22 JOE GRIFFITH: And they're widening --  
23 the plan calls for widening the runway, and that is  
24 appropriate also. It's a very narrow runway.

25 KARYN KING: Because we have a

1 warbird. 36 wide. So there's a comfort level.

2                   JOE GRIFFITH: Yeah, it's 35-foot  
3 runway and the landing gear's 25 feet apart. So...

4                   KARYN KING: But he's a fighter pilot,  
5 so he knows how to land anything anywhere. So...

6                   JOE GRIFFITH: That would be our  
7 comments.

8                                   (Meeting concluded.)

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<p><b>A</b></p> <p>accommodating 2:14</p> <p>action 5:8,9</p> <p>airfield 3:8</p> <p>airfields 3:4</p> <p>airport 2:5 3:19</p> <p>apart 4:3</p> <p>appropriate 3:24</p> <p>attorney 5:7,8</p> <hr/> <p><b>B</b></p> <p>better 2:13</p> <p>Big 3:6</p> <hr/> <p><b>C</b></p> <p>calls 3:23</p> <p>CCR 1:25 2:7 5:1 5:16</p> <p>Certification 5:17</p> <p>certified 5:1,17</p> <p>certify 5:2</p> <p>close 3:15</p> <p>comfort 4:1</p> <p>coming 2:10</p> <p>COMMENT 2:9 3:1</p> <p>comments 1:6 4:7</p> <p>complete 5:6</p> <p>completed 5:5</p> <p>concluded 4:8</p> <p>consider 2:11</p> <p>counsel 5:7,8</p> <p>County 5:2</p> <p>court 5:1,17</p> <hr/> <p><b>D</b></p> <p>day 5:12</p> <p>deal 2:18</p> <p>delivering 5:10</p> <p>different 2:17</p> <p>difficult 2:18 3:19</p> <p>direction 5:5</p> <p>doing 2:15</p> <hr/> <p><b>E</b></p> <p>efforts 3:3</p>	<p>employee 5:7,8</p> <p>Eskew 1:25 2:7 5:1,16</p> <p>expires 5:17</p> <hr/> <p><b>F</b></p> <p>family 2:12,13</p> <p>feasible 3:5</p> <p>feet 4:3</p> <p>Field 1:1 2:1,11 3:6</p> <p>fight 2:13</p> <p>fighter 4:4</p> <p>final 3:16</p> <p>financially 5:8</p> <p>foregoing 5:4</p> <p>friends 2:13</p> <p>full 5:5</p> <hr/> <p><b>G</b></p> <p>gear's 4:3</p> <p>glad 2:21</p> <p>going 3:13</p> <p>good 3:4,6</p> <p>GRIFFITH 3:1,2 3:10,15,22 4:2 4:6</p> <hr/> <p><b>H</b></p> <p>hardest 3:19</p> <p>Harvey 1:1 2:1 2:10 3:5</p> <p>helpful 2:14</p> <p>hereunto 5:11</p> <p>herewith 5:10</p> <p>home 2:11</p> <hr/> <p><b>I</b></p> <p>impressive 2:21</p> <p>Improvement 1:1 2:1</p> <p>interested 5:9</p> <p>involved 3:2</p> <hr/> <p><b>J</b></p> <p>job 3:7</p> <p>JOE 3:1,2,10,15 3:22 4:2,6</p> <hr/> <p><b>K</b></p> <p>Karyn 2:9,10 3:9</p>	<p>3:12,17,25 4:4</p> <p>Katie 1:25 2:7 5:1,16</p> <p>King 2:9,10 3:9 3:12,17,25 4:4 5:2</p> <p>know 2:22</p> <p>knows 4:5</p> <hr/> <p><b>L</b></p> <p>land 4:5</p> <p>landing 3:20 4:3</p> <p>lessons 3:18,21</p> <p>Let's 2:10</p> <p>level 4:1</p> <p>long 3:5,8</p> <p>looks 3:5</p> <hr/> <p><b>M</b></p> <p>managed 2:20</p> <p>master-planning 3:3</p> <p>meeting 1:2 2:2 4:8</p> <hr/> <p><b>N</b></p> <p>narrow 3:24</p> <hr/> <p><b>O</b></p> <p>o0o-- 2:8 4:9</p> <p>Okay 2:24</p> <p>organizations 2:17,18</p> <p>outcome 5:9</p> <p>overdue 3:5</p> <hr/> <p><b>P</b></p> <p>p.m 2:4</p> <p>part 2:21</p> <p>party 5:8</p> <p>People 2:12</p> <p>pilot 4:4</p> <p>plan 2:16 3:5,23</p> <p>probably 3:3,5</p> <p>proceeding 5:4</p> <p>Project 1:1 2:1</p> <p>promptly 5:10</p> <p>PRR 5:10</p> <p>PUBLIC 1:6 2:9 3:1</p>	<p>pull 2:20</p> <p>put 2:16</p> <hr/> <p><b>Q</b></p> <hr/> <p><b>R</b></p> <p>really 3:15</p> <p>relative 5:7,8</p> <p>remarkable 2:15</p> <p>removal 3:12</p> <p>Reported 2:7</p> <p>reporter 1:25 5:1 5:17</p> <p>result 3:7</p> <p>RPR 1:25 2:7 5:1 5:16</p> <p>run 3:8</p> <p>runway 1:1 2:1 3:23,24 4:3</p> <hr/> <p><b>S</b></p> <p>s/ 5:16</p> <p>safer 3:9,10,13</p> <p>saying 2:19</p> <p>Scoping 1:2 2:2</p> <p>sealing 5:10</p> <p>securely 5:10</p> <p>see 2:10</p> <p>set 5:11</p> <p>signature 5:11</p> <p>Snohomish 1:10 2:5</p> <p>ss 5:1</p> <p>started 3:18,21</p> <p>State 5:1,2</p> <p>stunned 2:16</p> <p>support 2:22</p> <p>supporter 3:6</p> <p>sure 3:7</p> <hr/> <p><b>T</b></p> <p>taken 5:4</p> <p>takeoff 3:19</p> <p>ten 2:17</p> <p>testimony 5:6</p> <p>thereof 5:9</p> <p>think 2:11,24 3:6</p> <p>thrilled 2:23</p> <p>traffic 3:17</p> <p>transcribed 5:5</p>	<p>transcript 5:5,6 5:10</p> <p>trees 3:13,16</p> <p>troubled 3:13</p> <p>true 5:5</p> <p>Tuesday 2:3</p> <p>turn 3:16</p> <hr/> <p><b>U</b></p> <p>user-friendly 3:8</p> <hr/> <p><b>V</b></p> <p>various 3:3</p> <hr/> <p><b>W</b></p> <p>warbird 4:1</p> <p>Washington 1:10 2:5 5:1,2</p> <p>way 2:5,22</p> <p>well-thought-out 2:16</p> <p>WHEREOF 5:11</p> <p>wide 4:1</p> <p>widening 3:22,23</p> <p>WITNESS 5:11</p> <p>witnesses 5:6</p> <hr/> <p><b>X</b></p> <hr/> <p><b>Y</b></p> <p>Yeah 4:2</p> <p>years 2:11 3:4,14</p> <hr/> <p><b>Z</b></p> <hr/> <p><b>0</b></p> <p>08/26/24 5:17</p> <hr/> <p><b>1</b></p> <p>1 2:9</p> <p>14 1:8 2:3 5:5</p> <p>15 3:3</p> <p>1953 5:17</p> <hr/> <p><b>2</b></p> <p>2 3:1</p> <p>20 2:11</p> <p>2024 1:8 2:3 5:5 5:12</p> <p>23rd 5:12</p> <p>25 4:3</p>
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<hr/> <b>3</b> <hr/> <b>35-foot 4:2</b> <b>36 4:1</b> <hr/>				
<hr/> <b>4</b> <hr/>				
<hr/> <b>5</b> <hr/> <b>50 3:4</b> <hr/>				
<hr/> <b>6</b> <hr/> <b>6:00 2:4</b> <hr/>				
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## Response to Commenter P-34

1. The comment regarding support of the Proposed Action and effort to involve agencies is noted.
2. The comment regarding support of the Proposed Action is noted.
3. The comment regarding enhanced safety at the Airport is noted.
4. The comment regarding support for the proposed tree removal is noted. Trees that are noted in the Proposed Action for removal are on private property and can only be trimmed or removed subject to an agreement with the property owner.
5. The comment regarding operations at the Airport is noted.
6. The comment regarding support of the new runway width is noted.

Last updated:  
5/28

Date	First Name	Last Name	Email	Phone	Comment
Apr 12 2:21 PM -07:00	Bonnie	Shorin	<a href="mailto:bonnie.shorin@noaa.gov">bonnie.shorin@noaa.gov</a>	3609952750	Please ensure a robust evaluation of stormwater runoff from this expansion of pollution generating impervious surface, treatment to be provided, and a full analysis of exposure and response of ESA listed fish and Critical Habitat, to any contaminants (eg PAHs, De-Icing Agents, Tire Wear Particles, 6ppd/ 6ppdq, PFAS) that may not be fully captured by the stormwater treatment provided.
				<b>Commenter P-35</b>	
Apr 12 1:22 PM -07:00	Neighbors	111th ST SE Neighborhood Watch	<a href="mailto:111thneighborhood@gmail.com">111thneighborhood@gmail.com</a>	N/A	We demand that the runway expansion be redirected facing north and south over farmland and factories, instead of over people's homes. It is a safety, quality of life, and environmental issue, as well as a property one. Currently Harvey airfield is already causing a tort by taking our property for their own personal gain, by preventing us from the enjoyment of our properties by continuing to fly directly above our properties and low altitudes, creating noise to an extent that it is a health hazard. We are asking that this plan be either shelved or modified as per runway direction. Failure to do so will end in costly and time consuming litigation, which will ruin their reputation and businesses.
				<b>Commenter P-36</b>	
Apr 26 6:41 PM -07:00	Richard	Nutt	<a href="mailto:richardnutt@yahoo.com">richardnutt@yahoo.com</a>	4254058249	Re routing airport way
				<b>Commenter P-37</b>	
Apr 28 12:28 PM -07:00	Lucy	Henderson	<a href="mailto:lucymhenderson35@gmail.com">lucymhenderson35@gmail.com</a>	N/A	N/A
May 10 4:13 PM -07:00	Chuck	Shields	<a href="mailto:chuckshields@frontier.com">chuckshields@frontier.com</a>	4258271263	This runway improvement is sorely needed all proposed aspects. I am afraid to land with the narrow runway and lack of overruns at either end. The power lines and fence at south end ate deadly hazards.
				<b>Commenter P-38</b>	
May 10 6:47 PM 07:00	Lee	Eddie	<a href="mailto:lee.keddie@gmail.com">lee.keddie@gmail.com</a>	4254710484	This is a much needed project and should greatly enhance both public resident, auto traffic and aircraft safety. Though Harvey Field Owners have done an excellent job in promoting safety while continuing to operate an exemplary airport, the current situation needs to be rectified in order for the business and community to continue to grow and thrive. These changes will not only greatly enhance safety, it will give better noise separation (relief to the community), better traffic flow, and give the airport the much needed space and infrastructure to continue to grow. This also brings significant industry and tourism to the Snohomish community.
				<b>Commenter P-39</b>	
May 15 9:59AM - 7:00	Barbara	King	<a href="mailto:barbara@king-ent.com">barbara@king-ent.com</a>	4254222097	I like the proposed changes, I believe they will make using Harvey Field easier and safer. I also like the movement of Airport Way. It will help with backups on Airport Way, Hwy 9 and Springhetti Road. I also feel they have address the water "issue" with a good/workable idea.
				<b>Commenter P-40</b>	
May 15 10:01AM - 7:00	Corey	King	<a href="mailto:corey@king-ent.com">corey@king-ent.com</a>	2067994001	I like the proposed improvements to Harvey Field. It will make using the airport safer.
				<b>Commenter P-41</b>	
May 15 6:56PM - 7:00	Cathy	Dugor	<a href="mailto:cathydugor@hotmail.com">cathydugor@hotmail.com</a>	4253599057	I do not agree with your expansion project. A few years ago, you said your kids' future was guaranteed thanks to the airport and that you wanted to expand in order to guarantee your grandchildren! You said you wanted private planes to come to your airport! What the hell! Snohomish is still a small town, a small community and that is not what we want and need. You have no shame pissing off the all town with more noise! I do also recall you wanted and I am sure you still want the county to pay for a new airport road on a flooding zone! You had a study done but if I recall, they are from Texas, so what do they know about our floods... nothing! When it is not raining and 8-9 months a year, your jumpers' plane is an absolute nightmare. it has its idle to the legal max, which is a constant annoyance with its buzzing and I am not talking about how dangerous is his piloting when every single time, he thinks he is in a military combat jet! One of these days, his wings are gonna fold... Anyway, for many reasons, I am against your expansion, your personal financial expansion and your greediness. I believe you play dirty and will find any excuse to screw the town and the county over. I do believe you have made a decision and I only hope your plans do not work. Sincerely
				<b>Commenter P-42</b>	
May 15 8:33 PM - 7:00	Candace	McKenna	<a href="mailto:candacemckenna1@hotmail.com">candacemckenna1@hotmail.com</a>	4253088168	I say "NO" to Harvey Field Expansion -- Keeping a plane at Harvey Field is how I first discovered the City of Snohomish, where I subsequently chose to put down roots and happily raise my children. Over the more than 35 years I've lived here, I've enjoyed a balloon ride, launched from Harvey, stopped to admire parachutes opening when I heard the plane carrying sky divers cut their engine, and been thankful for the emergency vehicles which can use Harvey Field as a base as needed. Harvey Field enhances my home community of Snohomish. According to the FAA, there is no projected increase in aircraft traffic or demand for Harvey Field. Nearby Paine and Arlington easily accommodate larger planes and other uses requiring a longer runway. Yet Harvey Field has put forward yet another plan to expand without giving a credible reason why this will be a public good. The facts have changed little in the 20 years since their proposal was first put forth, and this time all facts still point to saying "no" again to the proposed expansion. 1) Harvey Field is thriving now as it has for the past 80 years. The FAA is NOT threatening to shut it down as a privately-owned airfield. It can continue to thrive in its current configuration. 2) Harvey Field is claiming that they need to expand to meet FAA regulations, but the reality is that the FAA would only require that Harvey Field meet these regulations if they proceed with expansion. 3) Harvey Field has already received \$2.5 million dollars in taxpayer-funded grants to study just this latest proposed completely optional expansion. Harvey Field has received over \$4 million in the past 10 years including \$1 million in 2021 to reconstruct the current runway. 4) The plan introduces significant potential to disrupt the existing levy system. By putting 9.3 acres of fill into Hanson Slough, this critical floodwater conveyance would no longer function as it currently does. The current study which purports to address flooding concerns by putting in box culverts did NOT consult Snohomish County floodplain hydraulic engineers, the Marshland Flood Control district, FEMA, which has funded local levy improvements, or the Army Corp of Engineers which has acted when levees were breached well as funded and repaired our levees. 5) If expansion is approved a. Our road infrastructure will be stressed for at least two years as many trucks carrying fill are added to Airport Way, Springhetti Road and Highway 9. There are no plans to improve the capacity of the new road. b. The impacts to wildlife, especially fish, are unknown at this time and still under study. c. Our beloved farmlands will be at risk for flooding resulting from changes to a sound flood management structure. I am also urging the Snohomish County Exec. To not give this project status as a Public Works Project and grant a conditional use permit which would allow the rerouting of Airport Way and change the current flood management in that area. This Project proposes an outrageous use of our taxpayer dollars for private gain, at the same time disrupting traffic at an already highly congested intersection, introducing risk to local wildlife, and making unnecessary and potentially damaging changes to flood control.
				<b>Commenter P-43</b>	
May 17 12:08 PM - 7:00	John	Budd	<a href="mailto:buddjd@gmail.com">buddjd@gmail.com</a>	N/A	This project is about safety and should be approved
				<b>Commenter P-44</b>	
May 17 12:59 PM - 7:00	Will	Stillwell	<a href="mailto:will.stillwlel@gmail.com">will.stillwlel@gmail.com</a>	N/A	I fully support the modification to a wider and shorter slightly runway. The relocation of Airport way could actually benefit traffic coming from highway 9 by going straight vs having to turn left right away. I think for every tree removed, another tree should be planted, either on the property that it was removed from, or on Harvey property. Concern is the homeowners who's trees need removed might be the ones who oppose this runway move in the first place. This improvement project is in the best interest of all Snohomish county airports as the new setup will be safer. Noise will be reduced over the denser residence area.
				<b>Commenter P-45</b>	
May 18 11:01 AM - 7:00	Barbara	Bailey	<a href="mailto:barbarabailey55@gmail.com">barbarabailey55@gmail.com</a>	3605688826	The Draft EA contains many references to the Jviation 2018 Master Plan. I am unable to find that document in any of the appendixes. Where do I find the Jviation 2018 Airport Master Plan for Harvey Airfield?
				<b>Commenter P-46</b>	
May 18 1:46 PM - 7:00	Marjorie	Fields	<a href="mailto:mvfields@me.com">mvfields@me.com</a>	4253617020	With no predicted increase in traffic at Harvey Airfield, what is the purpose of the proposed expansion at the site? The proposal to dump huge quantities of fill into the Hanson Slough is ill advised and has not been reviewed by experts qualified to assess the potential environmental damage and flood risks.
				<b>Commenter P-47</b>	
May 19 11:48 AM - 7:00	Steve	Russo	<a href="mailto:srusso@umci.com">srusso@umci.com</a>	2067303522	My understanding is that this runway improvement would also require changes to Airport Way. WSDOT is currently preparing to let contracts for the expansion of SR9 from Marsh Road to Second Street in Snohomish. Has anyone coordinated timelines of both projects such that both Snohomish access roads would not be disrupted at the same time?
				<b>Commenter P-48</b>	

## Response to Commenter P-35

1. Section 3.4.5 in the Final EA has been revised to refer the reader to Section 3.16 in the Final EA, which has been revised to state that this increase in water quantity would be mitigated prior to discharge from Airport property through proposed permanent stormwater facilities. Section 3.16.3.5 in the Final EA has been revised to state that permanent stormwater facilities would be required to mitigate increase in peak flow rate and necessary water quality treatment. The locations, type, and sizing of proposed permanent stormwater facilities would be determined in final design. Impacts related to biological resources are addressed in Section 3.4 in the Final EA. Section 7 consultation with the National Marine Fisheries Service (NMFS)/U.S. Fish and Wildlife Service (USFWS) was ongoing at the time of the Draft EA publication. The USFWS issued a Letter of Concurrence on October 2, 2024, for the effects on bull trout and designated critical habitat (see Appendix C in the Final EA). However, NMFS held that the Proposed Action is likely to adversely affect Endangered Species Act (ESA)-listed salmonids, their critical habitat, and essential fish habitat for Pacific Coast salmon due to the effects from the pollutant 6PPD, and thus required formal consultation. Therefore, a revised BA was prepared and submitted to NMFS on September 5, 2024, with an adverse effect determination (see “NMFS Consultation” in Appendix C in the Final EA). NMFS issued their Biological Opinion on June 26, 2025. Section 7 consultation with both agencies (i.e., NMFS and USFWS) is summarized in Section 3.4.4 in the Final EA and Appendix C in the Final EA has been updated with the results of the consultation with these agencies.

## Response to Commenter P-36

1. The Proposed Action would not expand the Airport or its operations (i.e., would not change the number or type of aircraft currently operating at the Airport). The runway at the Airport would decrease in length from its existing 2,672 feet to 2,400 feet. Runway orientation is determined based on a variety of factors, such as topography, wind, etc. Reorientation of the runway is not part of the Proposed Action. The Proposed Action does not include property acquisition by the Airport Sponsor and no residences would be relocated because of the Proposed Action. As stated in Section 3.13.4 in the Final EA, the Proposed Action would decrease the noise exposure area by about 4 acres.

## Response to Commenter P-37

1. The comment regarding the proposed realignment of Airport Way is noted.

## Response to Commenter P-38

1. The comment supporting the safety enhancements of the Proposed Action are noted.

## Response to Commenter P-39

1. The comment supporting the Proposed Action enhancing safety for Airport users and local citizens is noted.

## Response to Commenter P-40

1. The comment supporting the Proposed Action is noted.

## Response to Commenter P-41

1. The comment supporting the safety enhancements of the Proposed Action are noted.

## Response to Commenter P-42

1. The Proposed Action would not expand the Airport or its operations (i.e., would not change the number or type of aircraft currently operating at the Airport). The runway at the Airport would decrease in length from its existing 2,672 feet to 2,400 feet. Section 1.3.1 in the Final EA discusses the critical aircraft group at the Airport, which is Aircraft Design Group II (small) and includes a range of aircraft types within that group beyond the Cessna Caravan. The Aircraft Design Group would not change because of the Proposed Action. As stated in Section 3.13.4 in the Final EA, the Proposed Action would decrease the noise exposure area by about 4 acres.
2. Section 3.14.3.3 in the Final EA discusses the proposed relocated Airport Way. Following the construction, the Airport Sponsor would dedicate the right-of-way to Snohomish County Public Works. Section 1.1.3 has been added to the Final EA to provide an overview on flooding history, levees, and flood control improvements in the Study Area. The proposed relocation of Airport Way has been deemed a public work project by Snohomish County exempting it from the density fringe regulations (Appendix I in the Final EA provides correspondence with the County to this effect). Appendix I in the Final EA has been revised to include floodplain modeling for the Proposed Action. Floodplain modeling that was inclusive of airfield and roadway improvements indicates that the FEMA-established BFEs would not increase as a result of the Proposed Action for the regulatory 100-year (one percent-annual-chance) flood event. Additional floodplain modeling will be conducted in final design and the Proposed Action will be required to demonstrate that it does not contribute to a cumulative increase in Base Flood Elevations (BFEs) that exceeds the limits prescribed in the Snohomish County Code 30.65 to obtain the County Flood Hazard Permit. Culverts are proposed beneath relocated Airport Way along the primary flowpath for the drainage basin for Hanson Slough (see Figure 3-35 in the Final EA).
3. The comment regarding noise from the skydiving operation is noted.
4. The comment regarding opposition to the Proposed Action is noted. The Airport Sponsor is coordinating with Snohomish County to ensure the Proposed Action is compliant with all Snohomish County regulations regarding land use, zoning, traffic, and floodplains.

## Response to Commenter P-43

1. See the responses to Commenter P-6. The comments of Commenter P-43 are a duplicate submission.

## Response to Commenter P-44

1. The comment supporting the safety enhancements of the Proposed Action are noted.

## Response to Commenter P-45

1. The comment supporting the Proposed Action is noted.
2. The comment regarding tree removal is noted. Trees that are noted in the Proposed Action for removal are on private property and can only be trimmed or removed subject to an agreement with the property owner.
3. The comment supporting the Proposed Action is noted.

## Response to Commenter P-46

1. The 2018 Master Plan is available online on the Airport website at <http://sites.jviation.com/harveyfield/2018-documents.html>.

## Response to Commenter P-47

1. The Proposed Action seeks to enhance safety by addressing nonstandard conditions at the Airport. The Proposed Action would not expand the Airport or its operations (i.e., would not change the number or type of aircraft currently operating at the Airport). The runway at the Airport would decrease in length from its existing 2,672 feet to 2,400 feet. Additionally, relocating Airport Way would move the road further from the end of the runway, thereby enhancing safety for the road and Airport users alike. Further, and as stated in Section 3.14.3.3 in the Final EA, the relocated road would include dedicated shoulders and bicycle lanes, of which do not occur on the existing Airport Way. Enhancing safety and providing shoulders and bicycle lanes are considered to be public benefits to the public commenters who have asked for shoulders and bicycle lanes. Appendix I in the Final EA has been revised to include floodplain modeling for the Proposed Action. Floodplain modeling that was inclusive of airfield and roadway improvements indicates that the FEMA-established BFEs would not increase as a result of the Proposed Action for the regulatory 100-year (one percent-annual-chance) flood event. Additional floodplain modeling will be conducted in final design and the Proposed Action will be required to demonstrate that it does not contribute to a cumulative increase in Base Flood Elevations (BFEs) that exceeds the limits prescribed in the Snohomish County Code 30.65 to obtain the County Flood Hazard Permit.

## Response to Commenter P-48

1. See the responses to Commenter P-12. The comments of Commenter P-48 are a duplicate submission.

May 20 4:21 PM - 7:00	Ant Hol	<a href="mailto:aaholloway@comcast.net">aaholloway@comcast.net</a>	N/A	<b>Commenter P-49</b>	I am opposed to growth generally. Growth serves the few at the expense of everybody and everything. This expansion would benefit the Harvey's, a few pilots and governments in the long run. Only a couple contractors and a few workers would benefit in the short run. Everybody within miles would suffer higher expenses, additional noise pollution, air pollution and congestion into perpetuity. Farmers may even deal with more water pollution and failing to reduce emissions is to the detriment of all life on planet earth. The noise they currently create for hundreds of Snohomish residents is already torturous. If they can't stop themselves from playing airplane, build a new airport a few miles west so their tailpipes stop causing ear damage. If a few people are flying into Harvey with inappropriate craft, they should be penalized, not coddled. They can find other ways to get to Snohomish if needed.	1 2 3
May 20 7:53 PM - 7:00	Edward Carr	<a href="mailto:edwardbcarr@gmail.com">edwardbcarr@gmail.com</a>	3108833607	<b>Commenter P-50</b>	Having received primary flight training at Harvey Field, I have the following observations. 1. Lengthening the runway to allow for touch-and-gos would be very helpful. 2. DO NOT eliminate a grass runway. Grass runways are a safety consideration for aircraft with conventional gear, which includes many historically important planes. Harvey Field is host to many such types of aircraft, and eliminating a grass runway option might require those aircraft owners to relocate their business to other airports.	1 2
May 21 10:17 AM - 7:00	Don Wells	<a href="mailto:thevelomann@msn.com">thevelomann@msn.com</a>	N/A	<b>Commenter P-51</b>	As part of a family that has lived in the area for quite literally generations, my comment and support would be for this project to be approved and supported by the community. We are facing a challenge to general aviation over time, where more and more of our smaller airports are under pressure from the building of housing, to the expansion of civic centers around them, that slowly makes them disappear. A safety and modernization update such as this proposal before us, provides a long term solution to continuance of a family history in Snohomish aviation, while also providing a solid community access to this amazing asset.	1
May 22 9:56 PM - 7:00	Shane Tully	<a href="mailto:shane-harvey@shanetully.com">shane-harvey@shanetully.com</a>	N/A	<b>Commenter P-52</b>	I wholeheartedly support all needed development to improve the runway at Harvey Field. The current runway is very close to the road and fence creating potential conflicts between air and ground traffic, especially in the event of an emergency landing or engine failure on takeoff. To that end, creating more of a buffer zone would improve safety. Otherwise, it would be nice to keep the runway at least as long as it currently is though. 2,400ft is on the shorter side, even for small piston planes. At the very least, ensuring adequate overrun space in the grass in the event of an emergency would be good for safety. It would also be nice to keep the parallel grass runway as these are good for pilot training and there are not many public grass runway options in western WA to use otherwise.	1 2 3
May 23 7:34 AM - 7:00	Don Satko	<a href="mailto:don.satko@gmail.com">don.satko@gmail.com</a>	2065719649	<b>Commenter P-53</b>	My family moved to Snohomish 36 years ago, I am second generation owner of the property directly to the south of Hanson Slough. For the most part our town of Snohomish and the Valley has stayed the same, I believe this is why people come here. Snohomish is revered for its agricultural fields teaming with produce and flowers, wedding and event venues, downtown's uniquely creative small owned businesses and our celebrations of life! The valley and town survive on this draw to our community. Before we risk any of this we should look back on the history of the valley and its flood waters. Over the past decades we have seen Hanson Slough filled with rain and flood water that pushes up against our property. When flooding occurs the proposed area for the expansion and Airport Way reroute has been under water. This has been a natural relief area for mild and heavy flooding. The proposed expansion and road reroute will take a considerable amount of fill material to match the established elevations which will then block the flow of water and push it directly toward our community to the south. The floods of 1975, 1990 and 2006 have established that Hanson Slough fills up to and beyond the current Airport Way. Those of us that have lived here for some time have seen the destruction first hand when this has occurred. This should be in the forefront of everyone's mind when a proposal is being presented that will disrupt the natural flow of the water in the valley. Wildlife and Migrating birds use Hanson Slough, which we see every year. Our skies and fields are full of the migrating geese and ducks, the treed area to the south of the slough is home to a multitude of wildlife and birds also. The environmental damage we will cause by tearing down the green spaces in the density fringe area as proposed by the Harvey's plan will be devastating. It is of utmost importance to keep our green spaces. According to Harvey's EA there has not been a wildlife survey completed. What they did provide was a couple day site visit observation in June. What happens if this expansion into the flood plain and re-routing of Airport Way doesn't occur? Nothing changes! The airfield continues as it is and Hanson Slough remains for GENERATIONS to come protecting the community from flood damage! Let's not spend Taxpayers money on a privately owned business expansion. We have far too many more pressing issues that the money would be better spent on. Thank you for your consideration. Don Satko 9605 111th Street SE Snohomish, WA. 98296	1
May 23 2:27 PM - 7:00	Kathleen Pozarycki	<a href="mailto:kathleen.pozarycki@co.snohomish.wa.us">kathleen.pozarycki@co.snohomish.wa.us</a>	4257545731	<b>Commenter P-54</b>	See letter sent via email 5-23-24 from Ken Klein	1
May 23 7:26 PM - 7:00	N/A English	<a href="mailto:englishmanley@comcast.net">englishmanley@comcast.net</a>	4255032375	<b>Commenter P-55</b>	Absolutely NOT. Increase in runway will contribute to more traffic regardless of how rosy of picture is painted. I'm against the expansion- with Harveys and their seven generations- I'm sure they can remember the 1975 flood and Highway 9 closed with piles of dead cattle stacked up on the North end of the highway 9 bridge. Any loss in farm land is not in the town's best interest. And I'm against using federal grant money to foot the bill for the studies- really? As a long time resident of the area that rivals the Harveys (great grand parents homesteaded 160 acres that is now occupied by NAPA pallet), I've seen the air traffic expand tremendously. Plus summer time air traffic over our house west of town can get a bit annoying. Please log four votes of NO for our household. There's got to be another place to voice our opinion than a comment page run by the company trying to get approval. One more thing- your studies were totally inadequate- nobody could answer how much water would be displaced by the expansion, or what kind of potential fish habitat could be affected. The tribes haven't even commented. thanks.	1 2 3 4 5 6 7 8 9
May 23 7:26 PM - 7:00	Pat Phillips	<a href="mailto:patphillips123@gmail.com">patphillips123@gmail.com</a>	N/A	<b>Commenter P-56</b>	No Thank You!	1

## Response to Commenter P-49

1. The comment opposing the Proposed Action is noted. The Proposed Action would not expand the Airport or its operations (i.e., would not change the number or type of aircraft currently operating at the Airport). The runway at the Airport would decrease in length from its existing 2,672 feet to 2,400 feet.
2. Section 3.8.4.2 in the Final EA describes the impacts to farmlands that would occur as a result of the Proposed Action. Farming activities would still occur on Harvey owned property. Additionally, as stated in the Final EA, the Airport Sponsor coordinated with the U.S. Department of Agriculture Natural Resources Conservation Service for the farmlands using the Form AD-1006, Farmland Conversion Impact Rating. It was determined through Form AD-1006 that the Proposed Action would have no significant impact on farmlands because the combined score was 147 points, which is below the significant impact threshold of 200 points. Proposed permanent stormwater facilities will be constructed on Harvey Property to mitigate increases in stormwater runoff and provide necessary water quality treatment. As shown in Appendix B in the Final EA, the Construction Emissions Inventory determined no exceedance of National Ambient Air Quality Standards thresholds during the construction of the Proposed Action.
3. As discussed in Section 3.13.4 in the Final EA, the Proposed Action would decrease the noise exposure area by about 4 acres. Section 1.3.1 in the Final EA discusses the critical aircraft group at the Airport, which is Aircraft Design Group II (small) and includes a range of aircraft types within that group beyond the Cessna Caravan. The Aircraft Design Group would not change because of the Proposed Action.

## Response to Commenter P-50

1. Lengthening the runway is not part of the Proposed Action. The 2018 Master Plan (MP) discusses runway length options and determined 2,400 feet would meet the needs of the Airport and meet local regulations. Therefore, under the Proposed Action, the runway at the Airport would decrease in length from its existing 2,672 feet to 2,400 feet.
2. The commenter's preference for the current airfield configuration including the grass runway is noted.

## Response to Commenter P-51

1. The comment supporting the Proposed Action is noted.

## Response to Commenter P-52

1. The comment supporting the Proposed Action is noted.
2. The comment regarding overall runway length is noted. The 2018 Master Plan (MP) discusses runway length options and determined 2,400 feet would meet the needs of the Airport and meet local regulations. The relocated runway would minimize incompatible land uses surrounding the runway, as well as minimize environmental impacts as discussed throughout Chapter 3 in the Final EA.
3. The commenter's preference for the current airfield configuration including the grass runway is noted.

## Response to Commenter P-53

1. See responses to Commenter P-15. The comments of Commenter P-53 are a duplicate submission.

## Response to Commenter P-54

1. See the responses to Commenters A-1 and A-2. The comments of Commenter P-54 refer to the comments provided by Commenters A-1 and A-2.

## Response to Commenter P-55

1. Lengthening the runway is not part of the Proposed Action. The 2018 Master Plan (MP) discussed runway length options and determined 2,400 feet would meet the needs of the Airport and meet local regulations. Therefore, under the Proposed Action, the runway at the Airport would decrease in length from its existing 2,672 feet to 2,400 feet. The Proposed Action would not increase operations at the Airport and would not generate additional vehicle trips.
2. The comment regarding opposition to the Proposed Action is noted. Section 1.1.3 has been added to the Final EA to provide an overview of flooding history, levees, and flood control improvements in the Study Area.
3. Section 3.8.4.2 in the Final EA describes the impacts to farmlands that would occur because of the Proposed Action. Farming activities would still occur on Harvey owned property. Additionally, as stated in the Final EA, the Airport Sponsor coordinated with the U.S. Department of Agriculture Natural Resources Conservation Service for the farmlands using the Form AD-1006, Farmland Conversion Impact Rating. It was determined through Form AD-1006 that the Proposed Action would have no significant impact on farmlands because the combined score was 147 points, which is below the significant impact threshold of 200 points.
4. The funding for the planning and environmental analysis of the Proposed Action is through the Federal Aviation Administration's (FAA) Airport Improvement Program (AIP). Airports within the National Plan of Integrated Airport Systems (NPIAS) are eligible for AIP funds. Harvey Field is in the NPIAS and, thus, is eligible for AIP funds. Funds obligated for the AIP are drawn from the Airport and Airway Trust fund, which is supported by several aviation-user taxes on such items as airline fares, air freight, and aviation fuel. The past and current AIP grants awarded to Harvey Field do not include taxpayer money from the general fund of the U.S. Treasury.
5. The comment regarding historical connections to the area and development is noted. The Proposed Action would not change operations at the Airport (i.e., would not change the number or type of aircraft currently operating at the Airport). Rather, the Proposed Action seeks to enhance safety by addressing nonstandard conditions at the Airport.
6. The comment regarding opposition to the Proposed Action is noted.
7. The comment regarding the public involvement process is noted. The process met FAA's requirements for public involvement under NEPA as outlined in FAA Order 1050.1F. Additional opportunities for public input will occur in the future per state and local permitting and final design.
8. Appendix I in the Final EA has been revised to include floodplain modeling for the Proposed Action. Floodplain modeling that was inclusive of airfield and roadway

improvements indicate that the FEMA-established BFEs would not increase as a result of the Proposed Action for the regulatory 100-year (one percent-annual-chance) flood event. Additional floodplain modeling will be conducted in final design and the Proposed Action will be required to demonstrate that it does not contribute to a cumulative increase in Base Flood Elevations (BFEs) that exceeds the limits prescribed in the Snohomish County Code 30.65 to obtain the County Flood Hazard Permit. The Proposed Action would not expand the Airport or its operations (i.e., would not change the number or type of aircraft currently operating at the Airport). The runway at the Airport would decrease in length from its existing 2,672 feet to 2,400 feet. Impacts related to biological resources are addressed in Section 3.4 in the Final EA. Section 7 consultation with the National Marine Fisheries Service (NMFS)/U.S. Fish and Wildlife Service (USFWS) was ongoing at the time of the Draft EA publication. The USFWS issued a Letter of Concurrence on October 2, 2024, for the effects on bull trout and designated critical habitat (see Appendix C in the Final EA). However, NMFS held that the Proposed Action is likely to adversely affect Endangered Species Act (ESA)-listed salmonids, their critical habitat, and essential fish habitat for Pacific Coast salmon due to the effects from the pollutant 6PPD, and thus required formal consultation. Therefore, a revised BA was prepared and submitted to NMFS on September 5, 2024, with an adverse effect determination (see “NMFS Consultation” in Appendix C in the Final EA). NMFS issued their Biological Opinion on June 26, 2025. Section 7 consultation with both agencies (i.e., NMFS and USFWS) is summarized in Section 3.4.4 in the Final EA and Appendix C in the Final EA has been updated with the results of the consultation with these agencies.

9. Local tribes were invited to participate in the EA process. Tribes were invited to comment during scoping for the EA, but no tribes elected to participate in scoping. Additionally, the FAA coordinated with the tribes on the area of potential effects and the finding of no historic resources affected because of the Proposed Action as part of Section 106 consultation and no tribes elected to participate. Finally, tribes were invited to participate by providing comments on the Draft EA. No tribes elected to participate.

## Response to Commenter P-56

1. The comment regarding opposition to the Proposed Action is noted.