

APPENDIX L

Summary of Changes to Final EA

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Summary of Changes to Final EA

The following corrections and changes were made to the Draft Environmental Assessment (EA) and are incorporated as part of the Final EA.

Acronyms and Abbreviations

The following acronyms were added to the Final EA:

- **BO.** Biological Opinion
- **CBRS.** Coastal Barrier Resources System
- **DA.** Development Agreement
- **EO.** Executive Order
- **MSL.** Mean Sea Level
- **NTSB.** National Transportation Safety Bureau
- **RPM.** Reasonable and Prudent Measure
- **TLOFA.** Taxilane Object Free Area
- **USC.** United States Code
- **WHA.** Wildlife Hazard Assessment
- **WHMP.** Wildlife Hazard Management Plan

The following acronym was removed from the Final EA:

- **CEQ.** Council on Environmental Quality
- **Tc.** Time of Concentration
- **FFRMS.** Federal Flood Risk Management Standard

Chapter 1: Purpose and Need and Proposed Action

The following changes were made to Chapter 1 of the Final EA:

- **1 Introduction.** Text was revised to remove references to the Council on Environmental Quality (CEQ) Regulations.
- **1.1 Airport Overview.** Text was revised to state the Airport sponsor owns 204.48 acres of land.
- **1.1 Airport Overview.** New Footnote 1 was added regarding the use of FAA Order 1050.1F instead of FAA Order 1050.1G.
- **1.1 Airport Overview.** New Footnote 2 was added regarding the removal of the discussion and analysis of cumulative impacts.
- **1.1.2 Airport Overview, Existing Landside Facilities.** Text was revised with more information about current level of service of Airport Way, use of displaced thresholds to ensure separation between aircraft and vehicles, and history of incidents where aircraft have overrun the runway and either crossed Airport Way or were stopped by the perimeter fence or structures.
- **1.1.3 Airport Overview, History of Flooding and Density Fringe at the Airport.** New section added to incorporate a brief overview of the history of flooding and the density fringe at the Airport.
- **1.3 Airport Master Plan.** Text was revised to incorporate the history of planning efforts at the Airport, including the 2004 Master Plan and change in critical aircraft in the 2014 Master Plan.
- **1.4.2.1 Purpose and Need, Need, Runway Standards.** Text in Runway Protection Zone paragraph was revised to describe in more detail the displaced thresholds usage to mitigate nonstandard conditions.
- **1.5 Proposed Action.** Text was updated regarding the new proposed location for the construction staging area, text was updated regarding the number of acres of impervious surfaces, and fill required for airfield and roadway components. Text was also updated regarding the dedication of relocated Airport Way after construction.

Chapter 2: Alternatives

The following changes were made to Chapter 2 of the Final EA:

- **2 Introduction.** Paragraph describing President's Council on Environmental Quality (CEQ) regulations was deleted due to change in regulations with new administration.

- **2.1.2 Alternatives Screening Process Overview, Step 2 Alternatives Screening: Technically Feasible and Reasonable.** Footnote 59 was updated to reference FAA Order 1050.1F instead of CEQ regulations.
- **2.5.1 Summary of Alternatives Carried Forward for Analysis, No Action Alternative.** Text was revised to reference FAA Order 1050.1F instead of CEQ regulations.

Chapter 3: Affected Environment, Environmental Consequences, and Mitigation

The following changes were made to Chapter 3 of the Final EA:

- **3 Introduction.** Text was revised to reference FAA Order 1050.1F instead of CEQ regulations.
- **3 Introduction.** Text was revised to reference the analysis of reasonably foreseeable direct and indirect impacts.
- **3.1 Study Area.** Text was revised to describe the license agreement the Airport Sponsor holds with Snohomish County.
- **3.3.4.2 Air Quality, Environmental Consequences, Proposed Action.** Text was added discussing reasonably foreseeable future projects.
- **3.4.3 Biological Resources, Affected Environment.** Text was added discussing the Wildlife Hazard Assessment and Wildlife Hazard Management Plan.
- **3.4.3.4 Biological Resources, Affected Environment, Migratory Birds.** Section was added describing potential migratory birds that could occur in Study Area with a new table.
- **3.4.4.2 Biological Resources, Environmental Consequences, Proposed Action.** Text was added to describe construction stormwater best management practices (BMPs). Text was added describing how stormwater runoff would cause effects on aquatic species receiving runoff. Text was revised to describe informal Section 7 consultation with U.S. Fish and Wildlife Service (USFWS) and formal Section 7 consultation with the National Marine Fisheries Service (NMFS).
- **3.4.5 Biological Resources, Mitigation Measures.** Text was added with the results of consultation with NMFS and Reasonable and Prudent Measures (RPM) outlined in the Biological Opinion.

- **3.5 Greenhouse Gas Emissions.** Heading was renamed from Climate to GHG Emissions. Text was removed that referenced NEPA, CEQ regulations, research, and memos.
- **3.5 Greenhouse Gas Emissions.** New Footnote 91 was added regarding the removal of Executive Order 13990, as well as CEQ regulations.
- **3.5.1 Greenhouse Gas Emissions, Significance Threshold.** Text was revised to reference FAA Order 1050.1F instead of CEQ regulations.
- **3.6.4.2 Coastal Resources, Environmental Consequences, Proposed Action.** Text was revised to state that the Airport Sponsor would obtain a Shoreline Substantial Development Permit and to better describe the setting of the Proposed Action within the Snohomish Urban Growth Area (UGA). Text was also added referring the reader to **Section 3.16.2.4** for more details on the permits related to Coastal Resources needed for the Proposed Action.
- **3.7.3 Department of Transportation, Section 4(f), Affected Environment.** Text was added describing Snohomish County's plans for the Snohomish River Regional Trail, which is currently in the planning phase. Footnote was added to describe the license agreement the Airport Sponsor holds with Snohomish County.
- **3.9.4.2 Hazardous Materials, Solid Waste, and Pollution Prevention, Environmental Consequences, Proposed Action.** Text was added discussing reasonably foreseeable future projects.
- **3.10.4.2 Historical, Architectural, Archaeological, and Cultural Resources, Environmental Consequences, Proposed Action.** Text was revised to describe the consultation process with DAHP.
- **3.11.4.2 Land Use, Environmental Consequences, Proposed Action.** Text was revised to state the Airport Sponsor intends to apply for a Conditional Use Permit (CUP) or Development Agreement (DA). Text was added that discussing that facility expansion or maintenance projects would not change existing land uses.
- **3.11.5 Land Use, Mitigation Measures.** Text was revised to state the Proposed Action would require a CUP or DA and the Airport Sponsor would coordinate with Snohomish County regarding the CUP or DA.
- **3.12 Natural Resources and Energy Supply.** Text was revised to remove references to CEQ.

- **3.12.4.2 Natural Resources and Energy Supply, Environmental Consequences, Proposed Action.** Text was added discussing reasonably foreseeable future projects.
- **3.13.4.2 Noise and Noise-Compatible Land Use, Environmental Consequences, Proposed Action.** Text was added discussing that on-Airport projects would not typically require a noise analysis.
- **3.14 Socioeconomics, Children’s Environmental Health and Safety Risks, and Surface Transportation.** Surface Transportation was added to the heading. The Environmental Justice section (Section 3.14.3 in the Draft EA) was deleted due to changes in regulations that went into effect in 2025.
- **3.14 Socioeconomics, Children’s Environmental Health and Safety Risks, and Surface Transportation.** New Footnote 132 was added regarding the removal of Environmental Justice from the analysis and EA.
- **3.14.1.4 Socioeconomics, Children’s Environmental Health and Safety Risks, and Surface Transportation, Socioeconomics, Environmental Consequences, No Action Alternative.** Text was revised to remove the statement that no land would be acquired, and displacement of people and businesses would not occur.
- **3.14.2.3 Socioeconomics, Children’s Environmental Health and Safety Risks, and Surface Transportation, Surface Traffic, Environmental Consequences, Proposed Action.** Heading was changed to Surface Transportation. Text was added discussing on-Airport and off-Airport reasonably foreseeable future projects.
- **3.14.4 Socioeconomics, Children’s Environmental Health and Safety Risks, and Surface Transportation, Socioeconomics, Children’s Environmental Health and Safety Risks, and Surface Transportation Conclusion.** Text referring to Environmental Justice was deleted due to change in regulations that went into effect in 2025.
- **3.15.1.4 Visual Effects, Light Emissions, Environmental Consequences, Proposed Action.** Text was added discussing ongoing Airport projects.
- **3.15.2.4 Visual Effects, Visual Resources and Visual Character, Environmental Consequences, Proposed Action.** Text was added discussing ongoing Airport projects.
- **3.16.1.4 Water Resources, Wetlands, Environmental Consequences, Proposed Action.** Text was revised to remove the statement that wetlands impacts would be minor because they only affect a small portion of the wetland. Text was also added discussing the lack of other projects involving wetlands.

- **3.16.1.5 Water Resources, Wetlands, Mitigation Measures.** Text was revised to add that the Airport Sponsor would coordinate with DOE and Snohomish County regarding wetlands permits and mitigation.
- **3.16.2 Water Resources, Floodplains.** The section was revised to move text regarding regulations into the next paragraph. Text referring to Federal Flood Risk Management Standard (FFRMS) was removed.
- **3.16.2.1 Water Resources, Floodplains, Significance Threshold.** Text was revised to include construction or flood related impacts and to refer the reader to **Section 3.16.2** for more information.
- **3.16.2.2 Water Resources, Floodplains, Methodology.** Section was revised to describe the floodplain analysis in more detail and to reorganize the paragraph into a more logical order. Text referring to FFRMS was removed.
- **3.16.2.3 Water Resources, Floodplains, Affected Environment.** Text was revised to state that floodwater would discharge southeast through an existing 18-inch culvert with a tidegate instead of east under an existing railroad overpass.
- **3.16.2.3 Water Resources, Floodplains, Affected Environment, Natural and Beneficial Floodplain Values.** Section was added.
- **3.16.2.3 Water Resources, Floodplains, Affected Environment, Climate Resiliency.** Section was renamed from Federal Flood Risk Management Standard (FFRMS) to Climate Resiliency. Text was added describing tidal influence and sea level rise. Text referring to FFRMS was removed and revised to reference FAA Order 1050.1F.
- **3.16.2.3 Water Resources, Floodplains, Affected Environment, Snohomish County Density Fringe Floodplain.** Text was revised to include that Harvey Field was not subject to the County density fringe development criteria until 2005, when FEMA revised the density fringe area extents to include the Airport with footnotes.
- **3.16.2.4 Water Resources, Floodplains, Environmental Consequences, Proposed Action.** Section was revised to be more concise in describing the Proposed Action.
- **3.16.2.4 Water Resources, Floodplains, Environmental Consequences, Proposed Action, Operational Impacts – Natural and Beneficial Floodplain Values.** Section was added.
- **3.16.2.4 Water Resources, Floodplains, Environmental Consequences, Proposed Action, Operational Impacts – Climate Resiliency** Section was renamed from Federal Flood Risk Management Standard (FFRMS) to Climate Resiliency. Paragraph was

added in the section discussing if the Proposed Action would be potentially affected by increases in the frequency and magnitude of Snohomish River flood events as result of sea level rise. Text was added to refer reader to **Appendix I**. Text referring to the FFRMS analysis was removed.

- **3.16.2.4 Water Resources, Floodplains, Environmental Consequences, Proposed Action, Operational Impacts – Snohomish County Density Fringe Floodplain.** Text was added to state that during a levee overtopping in a flood event, the floodplain flow can be multidirectional and therefore, cannot be defined into a single direction for the purposes of analysis. Text was added to refer reader to **Appendix I**. Paragraph was added discussing that a Habitat Assessment in compliance with the Endangered Species Act would be submitted to Snohomish County. Text was revised to state the Airport Sponsor owns 204.48 acres of land. Text was added to describe floodplains modeling for the Proposed Action and to refer the reader to **Appendix I** for the full floodplains modeling memo.
- **3.16.2.4 Water Resources, Floodplains, Environmental Consequences, Proposed Action, Operational Impacts – Marshland Flood Control District (FCD).** Text was added referring reader to **Section 3.16.3.4** for additional details on changes in stormwater runoff.
- **3.16.2.4 Water Resources, Floodplains, Environmental Consequences, Proposed Action, Operational Impacts – Snohomish County Shoreline Management Program (SMP).** Paragraph was added describing Shoreline Conditional Use Permit and Shoreline Variance Permit and referred the reader to **Appendix I** for more details.
- **3.16.2.5 Water Resources, Floodplains, Floodplain Summary.** Section was added.
- **3.16.3.3 Water Resources, Surface Waters, Affected Environment.** Text was added describing runoff discharge from Batt Slough and referring reader to **Appendix I** for additional details on the existing 18-inch culvert.
- **3.16.3.4 Water Resources, Surface Waters, Environmental Consequences, Proposed Action.** Text was added to discuss that due to existing low topographic relief across the site, the existing Airport Way alignment would continue to serve as a drainage divide and the boundaries for the North and South basins would be unaltered by the Proposed Action.
- **3.16.3.4 Water Resources, Surface Waters, Environmental Consequences, Operational Impacts – Hydrology and Hydraulics.** Text and Tables 3-20 and 3-21 were revised to 100-year storm event from 50-year.

- **3.16.3.4 Water Resources, Surface Waters, Environmental Consequences, Operational Impacts – Water Quality.** Text was added to describe permanent water quality facilities and infeasibility of infiltration facilities with footnotes.
- **3.16.3.5 Water Resources, Surface Waters, Mitigation Measures.** Text was added to include proposed permanent stormwater facilities.
- **3.16.4.3 Water Resources, Groundwater, Affected Environment.** Text was revised to correct that the lowest existing ground elevation in the Study Area is five feet, not four feet.
- **3.16.4.4 Water Resources, Groundwater, Environmental Consequences, Construction Impacts.** Text was revised to state that the new location of construction staging area would be located on the western side of Harvey property.
- **3.16.4.4 Water Resources, Groundwater, Environmental Consequences, Operational Impacts.** Text was revised to discuss that as additional stormwater runoff from new impervious surfaces would discharge to the Snohomish River, which is hydraulically connected to groundwater beneath the Study Area.
- **3.16.5.2 Water Resources, Water Resources Conclusion, Floodplains.** Text was revised to add a discussion of the No Action Alternative. Text referring to FFRMS was removed. Text was added to show FAA has determined that the encroachment would not constitute a significant floodplain encroachment and that the Proposed Action would not cause notable adverse impacts on natural and beneficial floodplain values.
- **3.16.5.4 Water Resources, Water Resources Conclusion, Groundwater.** Text was revised to discuss that the groundwater recharge rate would not be substantially affected due to additional stormwater runoff discharging to the Snohomish River, which is hydraulically connected to groundwater beneath the Study Area, with footnote.
- **3.17 Cumulative Impacts (in the Draft EA).** The section was deleted due to change in regulations that went into effect in 2025.
- **Section 3.17 Summary of Impacts and Mitigation.** The section was revised to include a summary of the mitigation measures in Section 3.4.5. The mitigation measures listed were also reorganized to be in the order they appear in the EA.
- **Table 3-24 Summary of Permits, Licenses, and Other Approvals for the Proposed Action.** A new row was added to include the Development Agreement. A new row was added to include the Endangered Species Act Habitat Assessment. A new row was added to include the Endangered Species Act Habitat Mitigation Plan.

Chapter 4: Agency Coordination and Public Outreach

The following change was made to Chapter 4 of the Final EA:

- **Section 4.1.2 Scoping, Public Scoping.** Text was revised to reflect 41 members of the public signed into the public scoping meeting, not 10 as previously stated.

Chapter 5: References

The following references were added to Chapter 5 in the Final EA. They are listed in the order of appearance in the document.

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- Snohomish County. (2010, September). Flood Hazard Management Issues in Snohomish County. Retrieved July 2024, from Snohomish County:
<https://www.snohomishcountywa.gov/DocumentCenter/View/6699/Flood-Hazard-Management-Issues-in-Snohomish-County?bidId=>
- Velush, L. and Switzer, J. (2016, November 11). Why it wasn't worse. Retrieved July 2024, from the Everett Herald: <https://www.heraldnet.com/news/why-it-wasnt-worse/>
- DOE. (2023). Plans for maintaining air quality. Retrieved December 2023, from DOE:
<https://ecology.wa.gov/Regulations-Permits/Plans-policies/State-implementation-plans/Maintenance-SIPs>.
- Harvey Field Airport. (2016, October). Wildlife Hazard Assessment for Harvey Field Airport, Snohomish, WA. Harvey Field Airport and WHPacific Inc.
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- Washington Department of Fish & Wildlife. (2023). Fish Passage & Diversion Screening Inventory Database. Retrieved October 31, 2023, from:
<https://geodataservices.wdfw.wa.gov/hp/fishpassage/index.html>.
- Anchor QEA. (2023). Harvey Field Runway Improvement Project Wetlands Report. Prepared for Harvey Field. November 2023.

- USFWS (2023). Coastal Barrier Resources System Mapper. Retrieved December 2023 from USFWS: <https://fwsprimary.wim.usgs.gov/CBRSMapper-v2/>.
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- ESA. (2023, June). Snohomish and Stillaguamish Rivers Flood Hazard and Climate Change Vulnerability Assessment. Retrieved June 2024, from Snohomish County: <https://snohomishcountywa.gov/DocumentCenter/View/111495/Final-Vulnerability-Assessment-6-28-23>.
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- Snohomish County. (2003). Snohomish County Code 30.65.255, Density Fringe Area: Maximum Allowable Obstruction. Retrieved August 2023, from Snohomish County: <https://snohomish.county.codes/SCC/30.65.255>.
- DOE. (n.d.). Shorelines of Statewide Significance. Retrieved July 2023, from DOE: <https://ecology.wa.gov/Water-Shorelines/Shoreline-coastal-management/Shoreline-coastal-planning/Shoreline-Management-Act-SMA/Shoreline-Management-Act-jurisdiction/Shorelines-of-statewide-significance>.
- Snohomish County. (n.d). Floodplain Development Regulations. Retrieved June 2024, from Snohomish County: <https://snohomishcountywa.gov/958/Floodplain-Development-Regulations>
- Snohomish County. (n.d.). Flood Hazard Permits. Retrieved March 2024, from Snohomish County: <https://snohomishcountywa.gov/1482/Flood-Hazard-Permits>.
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- FAA. (2021, June 7). Advisory Circular 150/5320-6G: Airport Pavement Design and Evaluation.
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- SCDM Volume III. (2021, July) Section 3.3.3, Infiltration Facilities for Flow Control and for Treatment.
- Snohomish County. (2007). Snohomish County Code 30.62C.140., Hydrogeologic Report. Retrieved December 2023, from Snohomish County: <https://snohomish.county.codes/SCC/30.62C.140>.

The following references were deleted from Chapter 5 in the Final EA.

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- CEQ. (2022, September 28). National Environmental Policy Act Implementing Regulations, Title 40 CFR Parts 1500-1508.
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- The White House. (2021, May 20). Executive Order on Climate-Related Financial Risk. Retrieved August 2023, from the White House: <https://www.whitehouse.gov/briefing-room/presidential-actions/2021/05/20/executive-order-on-climate-related-financial-risk/>.
- USEPA. (2022, April 28). Re-Instatement of Federal Flood Risk Management Standard for State Revolving Fund Programs. Retrieved July 2023, from USEPA: <https://www.epa.gov/system/files/documents/2022-09/Federal%20Flood%20Risk%20Managment%20Standard%20.pdf>.
- USEPA. (2022, December 9). Federal Flood Risk Management Standard. Retrieved July 2023, from USEPA: <https://www.fema.gov/floodplain-management/intergovernmental/federal-flood-risk-management-standard>.

Chapter 6: List of Preparers

The following preparer was added to Chapter 6 in the Final EA.

- **6.6.1 Federal Aviation Administration.** Laura Sample. Environmental Protection Specialist.