

Hickey, Lisa

From: georgina armstrong <georginaarmstrong@sbcglobal.net>
Sent: Saturday, June 28, 2025 12:48 PM
To: Contact Council
Subject: Table motion 25-298 and take no action

Hello,

I am writing to request that you table motion 25-298 and take no action because:

1. If Capstone cannot mitigate its impacts on the two creeks, then the project must be cancelled.
2. Wetland Banking in a different watershed is not mitigation.
3. Core summer salmonid habitat and endangered species habitats must be protected.

Destruction of this core salmon salmonid habitat and ESA habitat, without meaningful mitigation, should be enough to reject this project.

Georgina Armstrong
Edmonds, WA

From: [Marjorie Fields](#)
To: [Contact Council](#)
Subject: wetlands damage from Paine Field expansion
Date: Sunday, June 29, 2025 11:09:39 AM

Snohomish County Council members:

Obliterating wetlands at the headwaters of Big Gulch and Smuggler's Gulch Creeks in Mukilteo is too great a price to pay for expansion at Paine Field. Therefore Motion 25-298 should be tabled and no action taken.

Proposed mitigation plans in a different watershed will not help the two impacted creeks. Note that the proposal further endangers core summer Salmonoid habitat. I hope that County Code [SCC30.62A.550.2\(b\)](#) and State law [WAC 173-700-301](#) will help stop this bad plan — and that you will also.

Marjie Fields
Edmonds

From: [Jeanne Crevier](#)
To: [Contact Council](#)
Subject: Paine Field Airport, Westside Aerospace Complex, Motion No. 25-298
Date: Monday, June 30, 2025 9:39:16 AM

Council members:

I am writing to ask you to table Motion No. 25-298 and take no further action.

Capstone and PAE are proposing to amend the Capstone project and extend its development contract for another three-years. The amendment reduction in the lease area is meaningless because it does not affect the project development as currently proposed. By accepting a \$11,350 per month lease payment, PAE taints the SEPA process by prejudicing a fair and independent environmental review.

The project as currently proposed does not comply with County Code [SCC30.62A.550.2\(b\)](#) and State law [WAC 173-700-301](#) making approval by the resource agencies difficult. Capstone and PAE propose mitigation in a different watershed or WRIA (Water Resource Inventory Area) than its project. Capstone and PAE have not been able to demonstrate that its project will not seriously degrade the two creeks.

[WAC 173-700-302](#) mandates that wetland mitigation bank credits demonstrate that the ecological and hydrological benefits of the bank extend beyond the bank site location. Impacted reaches of Big Gulch and Smuggler's Gulch Creek's core summer salmonid habitat will receive absolutely no benefit from the proposed wetland mitigation bank.

In summary:

1. Table Motion 25-298 and take no action.
2. If Capstone cannot mitigate its impacts on the two creeks, then the project must be cancelled.
3. Wetland banking in a different watershed is not mitigation.
4. Core summer salmonid habitat and endangered species habitats must be protected.

Thank you for your attention to this important issue before the Council.

Jeanne Crevier

Council District 4

Mountlake Terrace, WA

From: [cynthiaj42258](#)
To: [Contact Council](#)
Subject: Table Motion 25-298
Date: Monday, June 30, 2025 2:37:15 PM

Dear Snohomish County Councilmembers:

I am writing to urge that you Table Motion 25-298 and take no action.
The current motion would impact Big Gulch and Smuggler's Gulch Creek core summer salmonid habitat. Salmon habitat must be protected.

It proposes wetland mitigation in a different watershed. Wetland Banking in a different watershed is not mitigation.

If Capstone cannot come up with a plan that will protect the watershed of the two creeks, than the project must be cancelled.

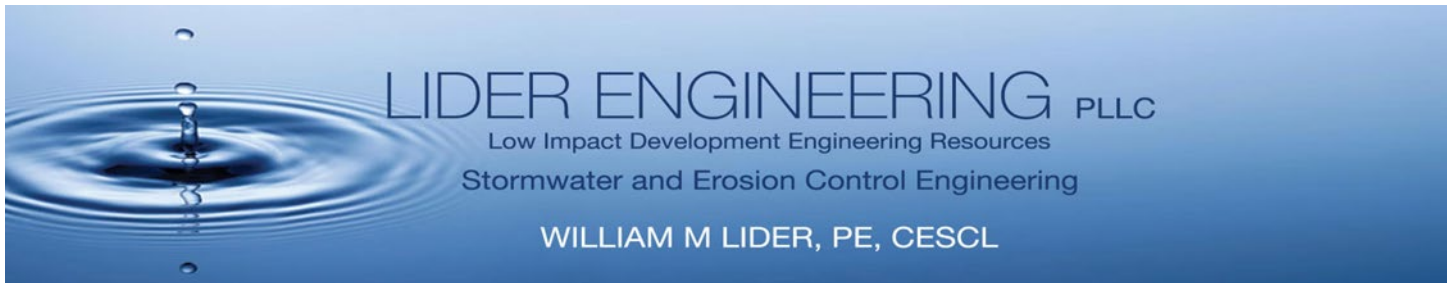
Sincerely,
Cynthia Jones
Edmonds

Sent from my T-Mobile 5G Device

From: bill.liderengineering.com
To: [Contact Council](#); [Mead, Jared](#); [Dunn, Megan](#); [Peterson, Strom](#)
Cc: [County Executive](#); bill.liderengineering.com
Subject: July 1, 2025 Planning & Community Development Committee, Table Motion 25-298, Paine Field Westside Aerospace Complex
Date: Monday, June 30, 2025 12:06:35 PM
Attachments: [2025-06-30 Lider Comments on Motion 25-298 SNOCO Planning & Community Development Committee.pdf](#)

I am contacting the County Council to request that no action be taken on [Motion 25-298](#) at the 11:00 am, July 1, 2025 Planning and Community Development Committee meeting. The Paine Field Westside Aerospace Complex project will forever harm Big Gulch and Smuggler's Gulch Creeks and its salmonid population, without any adequate mitigation. This project violates County Code and State law as currently proposed. This project is opposed by many local citizens, many environmental groups, and the [City of Mukilteo](#), all who have standing to bring an appeal of any Water Quality Certification by Ecology before the Pollution Control Hearings Board, outside of County politics. Paine Field Airport has an abysmal track record in environmental compliance and the County's best interests will be served by allowing the Capstone contract to terminate. Simply throwing money away on meaningless and worthless wetland mitigation in a different watershed in order to get a project permitted, is not mitigation. I encourage all persons copied on this email to *return-reply all* to this email and let the County Council know your thoughts on this ill-conceived project.

William Lider, PE, CESCL
LIDER ENGINEERING, PLLC
2526 – 205th Place SW
Lynnwood, WA 98036
425-776-0671 Office
206-661-0787 Cell



TRANSMITTED BY EMAIL

June 30, 2025

Snohomish County Council,

SUBJECT: Snohomish County Airport (PAE), Westside Aerospace Complex
Planning and Community Development Committee Meeting, July 1, 2025
Comments of William Lider, PE on Motion 25-298

Snohomish County Airport (PAE) and developer Capstone seek a 3-year extension of its development contract for the Westside Aerospace Complex, opining that its permitting delays are due to the National Marine Fishery Service, without any supporting evidence; however, it is my contention that the project delay is because it does not comply with County Code [SCC30.62A.550.2\(b\)](#) and State law [WAC 173-700-301](#) making approval by the resource agencies difficult.

Capstone and PAE propose mitigation in a different watershed or WRIA (Water Resource Inventory Area) than the watershed where this project is located. Capstone and PAE have not been able to demonstrate that its project will not seriously degrade the two creeks.

Capstone proposes to fill over 2.7 acres of wetlands at these creek's headwaters and 40 linear feet of Big Gulch Creek to construct its project without adequate mitigation.

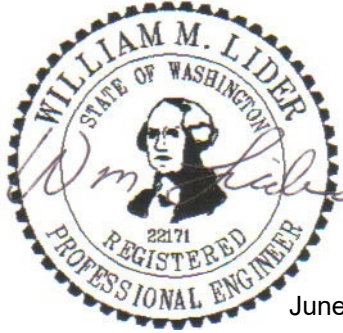
Downstream reaches of Big Gulch and other Puget Sound coastal streams have been documented as critical habitat, used as rearing areas for federally listed threatened Chinook salmon, the primary prey species for the threatened Orca whales.

The County Council should:

1. Table Motion 25-298 and take no action.
2. If Capstone cannot mitigate its impacts on the two creeks, then the project must be cancelled.
3. Wetland Banking in a different stream or watershed is not mitigation.
4. Core Summer Salmonid Habitat and endangered species habitats must be protected.

This project is opposed by dozens of County residents, many environmental organizations, and the City of Mukilteo. Please read the attached comments letters before voting to approve Motion 25-298 and Amendment 1 to Capstone's development contract.

Respectfully submitted,
LIDER ENGINEERING, PLLC



June 30, 2025

William Lider, PE
Principal Engineer

Attachments:

City of Mukilteo Comments Opposition to the Snohomish County Airport Westside Signed.pdf
2025-01-13 Lider Comments Paine Field Corps Permit FILED.pdf
2025-03-14 Lider Comments PAE Westside Aerospace Complex Aquatics ID No. 143467 FILED.pdf
2025-03-06 Lider Comments PAE Westside Aerospace Complex Aquatics ID No. 143467 FILED.pdf



CITY OF
MUKILTEO

Executive Department

MEMO

Date: March 26, 2025

To: Department of Ecology – SEA Program Federal Permit Unit,
ecyrefedpermits@ecy.wa.gov

From: Mayor Marine, City of Mukilteo

RE: Environmental & Infrastructure Concerns Regarding Proposed Snohomish County Paine Field Airport (PAE) Westside Aerospace Complex, Water Quality Certification (WQC) Ecology Aquatics ID Number: 143467

City of Mukilteo Comments: Opposition to the Snohomish County Airport Westside Aerospace Complex Approval

1. Introduction

The City of Mukilteo submits this response to formally express opposition to the proposed Snohomish County Airport Westside Aerospace Complex Approval, due to significant environmental and infrastructure concerns. Specifically, the project would result in the loss of 2.7 acres of wetland and the culverting of 40 feet of Big Gulch, both of which have severe ecological consequences that cannot be adequately mitigated. Also, the additional 32 acres of impervious area that will be created that could lead to catastrophic impacts to the community's wastewater and stormwater infrastructure along Big Gulch.

2. Environmental Concerns

2.1 Wetland Loss

The proposed facility would eliminate 2.7 acres of wetland, which serve as critical environmental resources by:

- Providing habitat for native flora and fauna, including endangered species of local and regional significance.
- Acting as natural filtration systems for pollutants, improving water quality in downstream areas and maintaining the summer hydrology for salmonoid streams such as Big Gulch and Smugglers Gulch.
- Retaining stormwater and mitigating flood risks, reducing the impact of heavy precipitation events.



CITY OF MUKILTEO

Executive Department

- Protecting the critical wastewater infrastructure that runs along Big Gulch and could negatively impact the Wastewater Treatment plant in Big Gulch and the proposed estuarine restoration planning that is currently underway.
- Protecting the slope stability along Big Gulch and Smuggles Gulch that has major residential infrastructure that could fail over time as the toe of the slopes erode and lead to landslides that will make the homes slide into the Gulches.

The destruction of these wetlands and negative impact to the hydrology could lead to increased runoff, higher pollutant loads in local waterways, and habitat destruction. The loss of wetlands in this area would be a violation of Mukilteo's commitment to environmental stewardship and is inconsistent with regional conservation goals and regulations as pointed out by William Linder's correspondence from March 6, 2025.

2.2 Impact on Big Gulch

Big Gulch is a vital ecological corridor within the region, supporting:

- Hydrological stability by maintaining groundwater recharge and base flow to downstream areas.
- Biodiversity through its function as a habitat for aquatic and terrestrial species.
- Water quality by filtering sediments and pollutants.

The proposed 40-foot culverting of Big Gulch will disrupt the natural flow of water, leading to downstream erosion, potential flooding, and habitat fragmentation. Culverting is a well-documented cause of aquatic ecosystem degradation and reduces the ability of fish and other aquatic species to navigate their natural habitats.

3. Regulatory and Policy Considerations

The project contradicts multiple environmental policies and regulations, including:

- **The Clean Water Act (CWA)** – The destruction of wetlands and culverting of Big Gulch may violate Section 404, which protects waters of the United States.
- **Mukilteo Critical Areas Ordinance** – The city has strict protections for wetlands and riparian corridors, which this project does not adequately address.
- **State and Local Stormwater Management Requirements** – Increased impervious surfaces and loss of wetland filtration functions will burden stormwater infrastructure and degrade water quality.

4. Conclusion and Recommendation

Based on the severe environmental impacts outlined above, the City of Mukilteo strongly opposes the approval of the Paine Field Aerospace Facility in its current form. We recommend the following actions:



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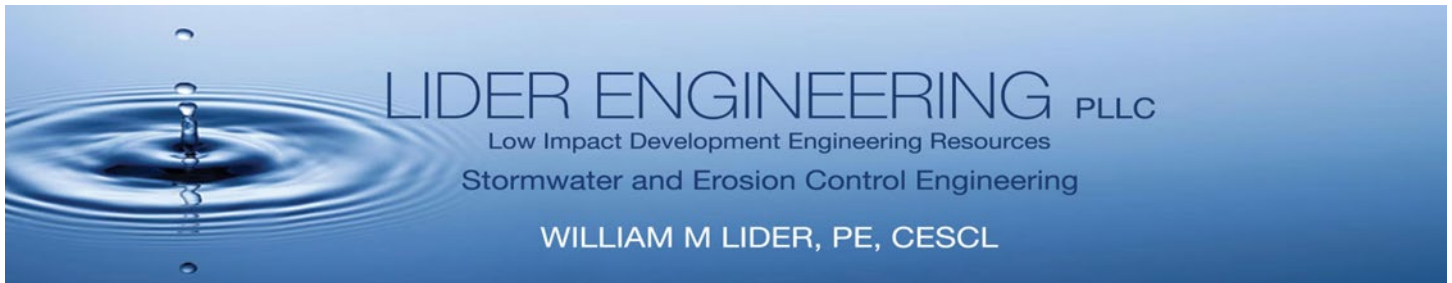
1. **Reevaluation of Site Design** – Consider alternative site planning to avoid wetland destruction and minimize impacts to Big Gulch.
2. **Comprehensive Environmental Impact Statement (EIS)** – Conduct a full EIS to assess the long-term consequences of wetland loss and culverting especially on the infrastructure currently in Big Gulch and at the top of the steep slopes in Big Gulch and Smugglers Gulch.
3. **Enhanced Mitigation Measures** – Require substantial mitigation efforts, such as wetland restoration and preservation projects, to compensate for environmental damage **in the same Hydraulic Unit Code (HUC)** not just the same Water Resource Inventory Area (WRIA 8).

Until these concerns are addressed, we urge the responsible agencies to deny approval for this project to protect the environmental integrity of Mukilteo and Possession Sound as well and the long-term sustainable development that residents of Mukilteo require to support their families and housing inventory.

City of Mukilteo

Mayor Joe Marine
Mayor Joe Marine (Mar 26, 2025 16:59 PDT)

Mayor Joe Marine



TRANSMITTED BY EMAIL

January 13, 2025

Ryan Cochoit
U.S. Army Corps of Engineers, Regulatory Branch
ryan.j.cochoit@usace.army.mil

Washington State Department of Ecology
Attention: Federal Permitting Section
fedconsistency@ecy.wa.gov

SUBJECT: Snohomish County Airport (Westside Aerospace Complex)
JARPA Permit Application No. NWS-2024-940-WRD
Comments of William Lider, PE
Request for Public Hearing

Applicant Snohomish County Airport proposes to fill 2.7 acres of wetlands and 40 linear feet of Stream A to construct a new aerospace facility and attendant features at Paine Field Airport (PAE) in the headwaters of Big Gulch and Smuggler's Gulch Creeks.

The proposed mitigation for the loss of 2.7 acres of wetlands will not maintain the treatment, the functions, and the values of the wetlands fish & wildlife habitat, or the buffers required to offset the impacts to critical areas functions and values of the two creeks. The project as currently proposed will result in an adverse net impact from the loss of critical area functions and values in their watershed.

Downstream reaches of Big Gulch and other Puget Sound coastal streams have been documented as critical habitat, used as rearing areas for federally listed threatened Chinook salmon, the primary prey species for the threatened Orca whales.

For the reasons listed below, it is requested that the Corps disapprove the subject permit application. However, should the Corps elect to move forward with this permit application, then it is requested that a public hearing be held so that additional experts may provide testimony on the proposed wetland loss.

1. Mitigation proposed for wetland loss is ineffective

The Applicant proposes to compensate the 2.7 acre wetland loss and 40-feet of stream loss to compensate this loss by purchasing mitigation credits through the Paine Field Wetland Compensation Bank. The proposed use of banked mitigation credits will not result in maintaining the treatment, the functions, and the values of the wetland, and fish and wildlife habitat conservation area or buffer to offset the impacts to critical areas

functions and values on the project site such that the total net impact will be no net loss of critical area functions and values in the watershed.

The project is not even in the same watershed as the mitigation bank proposed for this project. The Paine Field Wetland Compensation Bank is located in a different WRIA (Water Resource Inventory Area) than the proposed Airport development. The Airport project is in WRIA 8, while the mitigation bank is located in WRIA 7, a completely different watershed. Doing wetland mitigation in a different stream basin, let alone a different watershed will not provide equivalent treatment of the functions and values of the wetlands at the headwaters to Big Gulch Creek.

Snohomish County Code, [SCC 30.62A.550.2\(b\)](#) states:

(b) The use of the mitigation bank will result in equivalent treatment of the functions and values of the wetland, fish and wildlife habitat conservation area or buffer to offset the impacts to critical areas functions and values on the project site such that the total net impact will be no net loss of critical area functions and values in the watershed in which the impacts will occur. For the purposes of this section, "watershed" means an area identified as a state of Washington water resource inventory area (WRIA) under WAC [173-500-040](#).

Figure 1 below shows the proposed watershed (WRIA) boundary. The project is mostly in the Big Gulch Creek drainage basin, but also partly in the Smuggler's Gulch Creek drainage too. Both of these drainage basins are in WRIA 8, while the Paine Field Wetland Compensation Bank.

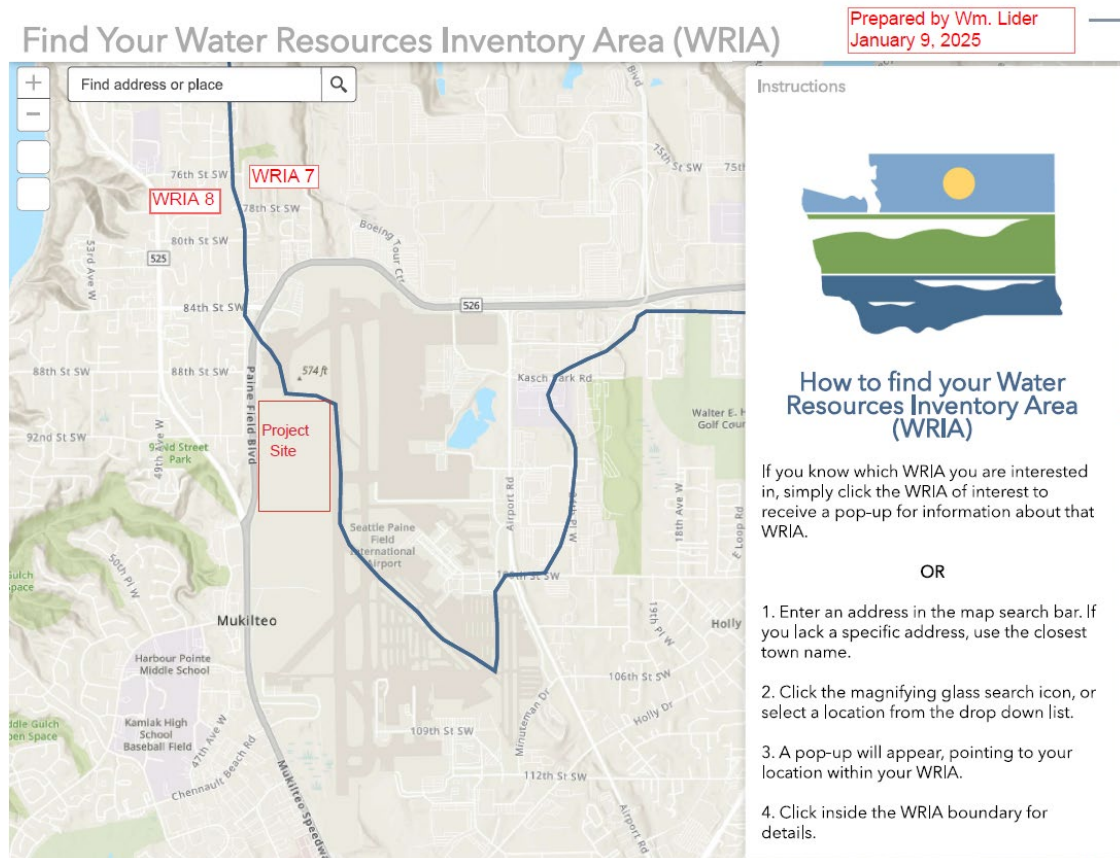


Figure 1: Project location in WRIA 8 is not eligible to use banked wetland credits in WRIA 7 per SCC30.62A.550.2(b).

Snohomish County Code explicitly prohibits using mitigation banked credits in a different watershed (WRIA); however, even if the code did allow banked credits in another watershed, it would not provide equivalent mitigation for the threatened species in Big Gulch Creek.

2. Threatened Species not addressed

The loss of 2.7 acres of wetlands as well as 40-feet of stream will result in unmitigated harm to non-natal, juvenile Chinook salmon in Big Gulch Creek. The threatened species use of Big Gulch Creek by Chinook salmon has been documented in the December 3, 2013 report, *JUVENILE CHINOOK SALMON REARING IN SMALL NON-NATAL STREAMS DRAINING INTO THE WHIDBEY BASIN*, E.M. Beamer, et.al.

Because Big Gulch Creek is a critical link in the Chinook salmon's life cycle, it constitutes *Essential Fish Habitat* under the Magnuson-Stevens Fishery Conservation and Management Act, as amended by the Sustainable Fisheries Act of 1996.

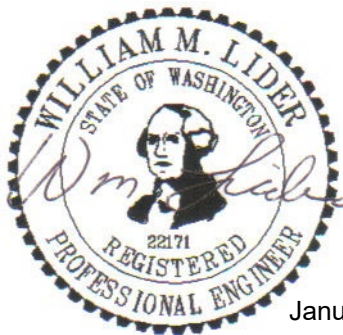
Before proceeding further, additional study and a report is required by independent, competent fisheries biologist to evaluate the loss of these wetlands and their impact to the Big Gulch and Smuggler's Gulch stream systems.

3. Basin stream flows must be maintained

Basin stream flows must be maintained, pursuant to Minimum Requirement 4: Preservation of Natural Drainage Systems and Outfalls, [SCC 30.63A.520](#). There is no discussion of any differentiation between the Smuggler's Gulch Creek and Big Gulch Creek which must be addressed.

The foregoing comments should be considered preliminary, and I may wish to augment them at a later date as additional information on these projects becomes available.

Respectfully submitted,
LIDER ENGINEERING, PLLC



January 13, 2025

William Lider, PE, CESCL
Principal Engineer

Attachment: JARPA Permit Application No. NWS-2024-940-WRD



US Army Corps
of Engineers
Seattle District



Joint Public Notice

Application for a Department of the Army Permit and a Washington Department of Ecology Water Quality Certification and/or Coastal Zone Management Consistency Decision

US Army Corps of Engineers
Regulatory Branch
4735 E. Marginal Way S, Bldg
1202 Seattle, WA 98134-2388
Telephone: (206) 601-2691
ATTN: Ryan Cochoit,
Project Manager

WA Department of Ecology
SEA Program
Post Office Box 47600
Olympia, WA 98504-7600
Telephone: (360) 407-6076
ATTN: SEA Program,
Federal Permit
Coordinator

Public Notice Date: January 8, 2025
Expiration Date: February 7, 2025

Reference No.: NWS-2024-940-WRD
Name: Snohomish County Airport
(Westside Aerospace Complex)

Interested parties are hereby notified that the U.S. Army Corps of Engineers (Corps) and the Washington Department of Ecology (Ecology) have received an application to perform work in waters of the U.S. as described below and shown on the enclosed drawings dated August 13, 2024.

The Corps will review the work in accordance with Section 404 of the Clean Water Act (CWA). Ecology will review the work pursuant to Section 401 of the CWA, with applicable provisions of State water pollution control laws and the Coastal Zone Management Act.

APPLICANT:

Attention: Andrew Rardin
Snohomish County Airport
9901 24th PL W, Suite A
Everett, Washington 98204
Telephone: (425) 388-5115

AGENT:

Attention: Hugh Mortensen
Facet
750 6th Street South
Kirkland, Washington 98033
Telephone: (425) 650-1306

LOCATION: In Wetlands adjacent to at Paine Field Airport, at Everett, Snohomish County, Washington. (47.91488, -122.290077)

NWS-2024-940-WRD, Snohomish County Airport (Westside Aerospace Complex)

WORK: Place fill in 2.7 acres of wetlands and 40 linear feet of unnamed stream to construct a new wide-body cargo and manufacturing space with direct access to the runway for aerospace clients and attendant features (stormwater facilities, roads, etc.).

PURPOSE: Provide aerospace facilities to support Paine Field airport for Snohomish County

ADDITIONAL INFORMATION:

The applicant proposes to place fill in 2.7 acres of wetlands (Table 1) and 40 linear feet of Stream A to construct a new aerospace facility and attendant features (stormwater facilities, roads, etc.). Work would be performed by mechanical equipment. Temporary sediment and erosion controls would be used to protect downstream waters during construction.

Table 1.

Activity (fill, drain, excavate, flood, etc.)	Wetland Name¹	Wetland type and rating category²	Impact area (sq. ft.)	Duration of impact³	Proposed mitigation type⁴	Wetland mitigation area (sq. ft. or acres) *
Fill	Wetland 1	Category IV	9,818	Permanent	B	
Fill	Wetland 2	Category IV	2,726	Permanent	B	
Excavate	Wetland 3	Category IV	756	Permanent	B	
Excavate	Wetland 3A	Category IV	15,052	Permanent	B	
Excavate	Wetland 4	Category III	35,101	Permanent	B	
Fill	Wetland 5	Category IV	3,044	Permanent	B	
Fill	Wetland 6	Category III	37,602	Permanent	B	
Fill	Wetland 7A	Category III	534	Permanent	B	
Fill	Wetland 12	Category III	11,314	Permanent	B	
Excavate	Wetland 101	Category IV	1,338	Permanent	B	
Excavate	Wetland 401	Category IV	4,267	Permanent	B	
Fill	Wetland 402	Category IV	456	Permanent	B	

The proposal includes the construction of a main facility building, security building, and maintenance specifically related to uses dependent on large, commercial aviation runway access. In addition to the structures, the proposal includes large and medium airplane berths, airplane movement and maneuvering areas/ramps, new/reconfigured airplane taxi lanes from the existing runway, truck loading berths, and van/box truck loading docks.

An engineered stormwater facility will be constructed in compliance with the most current version of the Snohomish County Stormwater Manual.

The site is expected to be developed over two consecutive construction seasons. Site grading, utilities, and paving in preparation for building construction will be completed during the first season. Construction on the buildings will begin in the first season and conclude at the end of

NWS-2024-940-WRD, Snohomish County Airport (Westside Aerospace Complex)

the second season. Each construction season is assumed to be June through October in consecutive years.

Construction will begin with clearing and grubbing of the site, and preparation of a staging area for equipment and materials. General site grading will follow using scrapers, excavators, and dozers. Excess material will be removed from the project area and stockpiled, either offsite in an approved facility or on the airport site for use on future projects. Utility installation will follow grading and will be completed to points outside of paved areas and stubbed into building foundations. Upon completion of utility installation, construction of building foundations will commence using excavators, dozers, concrete trucks/pumps, and hand tools. Upon completion of foundations, building construction can begin using forklifts, cranes, and labor. Paving of the parking lot, access road, and pavement immediately surrounding the building sites will be completed in the first season. Building construction will progress inside the outer shell through the winter.

Season 2 will begin when the weather allows paving operations. The aircraft apron will be constructed first, followed by the connections to the existing airport facilities. Final site activities will include seeding/mulching, pavement markings, and signage. Final building activities will include facility commissioning, tenant acceptance, and building occupancy permitting.

The wetland boundaries and line of mean high water shown on the project drawings have not yet been verified by the U.S. Army Corps of Engineers (Corps). If the Corps determines the boundaries of the wetland/waters are substantially inaccurate a new public notice may be published.

MITIGATION:

The project is limited to available locations given the required proximity to the existing airport, associated runway, and common-use taxi lane. Much of the project site is encumbered by wetlands, streams, and their associated buffers. As such, complete avoidance is not possible and would prevent the development entirely. To avoid critical areas and associated buffers to the greatest extent feasible, components of the project have been strategically designed and reconfigured to arrive at the current proposal. The project proposal has been limited to the northern portion of the project area to minimize and avoid impacts to higher-quality wetland habitats and streams.

However, due to FAA safety and regulatory reasons, perpetual site protection of avoided wetland areas south of the project area is not proposed by the project. As proposed, the development will require approximately 119,680 SF (2.7 acres) of permanent wetland impacts. Temporary impacts will be restored in place following project construction. To compensate for the impacts that cannot be mitigated on-site, additional mitigation credits will be purchased through the Paine Field Wetland Compensation Bank.

ENDANGERED SPECIES: The Endangered Species Act (ESA) requires federal agencies to consult with the National Marine Fisheries Service (NMFS) and/or U.S. Fish and Wildlife Service (USFWS) pursuant to Section 7 of the ESA on all actions that may affect a species listed (or proposed for listing) under the ESA as threatened or endangered or any designated critical

NWS-2024-940-WRD, Snohomish County Airport (Westside Aerospace Complex)

habitat. The FAA as the lead agency for ESA consultation, will consult with the NMFS and/or the USFWS as required under Section 7 of the ESA.

ESSENTIAL FISH HABITAT: The Magnuson-Stevens Fishery Conservation and Management Act, as amended by the Sustainable Fisheries Act of 1996, requires all Federal agencies to consult with the NMFS on all actions, or proposed actions, permitted, funded, or undertaken by the agency, that may adversely affect Essential Fish Habitat (EFH). The proposed action would impact EFH in the project area. The FAA as the lead agency for a determination regarding EFH, will consult with the National Marine Fisheries Services if necessary.

CULTURAL RESOURCES: The FAA as the lead agency for determining compliance with Section 106 of the National Historic Preservation Act, will consult with the State Historic Preservation Officer and Native American Nations as appropriate.

PUBLIC HEARING: Any person may request, in writing, within the comment period specified in this notice, that a public hearing be held to consider this application. Requests for public hearings shall state, with particularity, the reasons for holding a public hearing.

EVALUATION – CORPS: The decision whether to issue a permit will be based on an evaluation of the probable impacts, including cumulative impacts, of the proposed activity on the public interest. That decision will reflect the national concern for both protection and utilization of important resources. The benefits, which reasonably may be expected to accrue from the proposal, must be balanced against its reasonably foreseeable detriments. All factors which may be relevant to the proposal will be considered, including the cumulative effects thereof; among those are conservation, economics, aesthetics, general environmental concerns, wetlands, historic properties, fish and wildlife values, flood hazards, floodplain values, land use, navigation, shoreline erosion and accretion, recreation, water supply and conservation, water quality, energy needs, safety, food and fiber production, mineral needs, considerations of property ownership, and, in general, the needs and welfare of the people.

The Corps is soliciting comments from the public; Native American Nations or tribal governments; Federal, State, and local agencies and officials; and other interested parties in order to consider and evaluate the impacts of this activity. Any comments received will be considered by the Corps to determine whether to issue, modify, condition or deny a permit for the work. To make this decision, comments are used to assess impacts on endangered species, historic properties, water quality, general environmental effects, and the other public interest factors listed above. Comments are used in the preparation of an Environmental Assessment and/or an Environmental Impact Statement pursuant to the National Environmental Policy Act. Comments are also used to determine the need for a public hearing and to determine the overall public interest of the activity.

The described discharge will be evaluated for compliance with guidelines promulgated by the Environmental Protection Agency under authority of Section 404(b)(1) of the CWA. These guidelines require an alternatives analysis for any proposed discharge of dredged or fill material into waters of the United States.

NWS-2024-940-WRD, Snohomish County Airport (Westside Aerospace Complex)

SOURCE OF FILL MATERIAL: The source of the fill material will be suitable native material from the project site or a permitted borrow pit. If sourced, fill soils will be selected such that they are clean.

EVALUATION – ECOLOGY: Ecology is soliciting comments from the public; Federal, Native American Nations or tribal governments, State, and local agencies and officials; and other interested parties in order to consider and evaluate the impacts of this activity. Ecology will be considering all comments to determine whether to certify or deny a Section 401 Water Quality Certification for the proposed project.

As a Federal agency, the FAA will contact the Washington Department of Ecology directly to ensure the work is consistent with the Coastal Zone Management Program.

COMMENT AND REVIEW PERIOD: Conventional mail or e-mail comments on this public notice will be accepted and made part of the record and will be considered in determining whether authorizing the work would not be contrary to the public interest. In order to be accepted, e-mail comments must originate from the author's e-mail account and must include on the subject line of the e-mail message the permit applicant's name and reference number as shown below. Either conventional mail or e-mail comments must include the permit applicant's name and reference number, as shown below, and the commenter's name, address, and phone number. All comments whether conventional mail or e-mail must reach this office, no later than the expiration date of this public notice to ensure consideration.

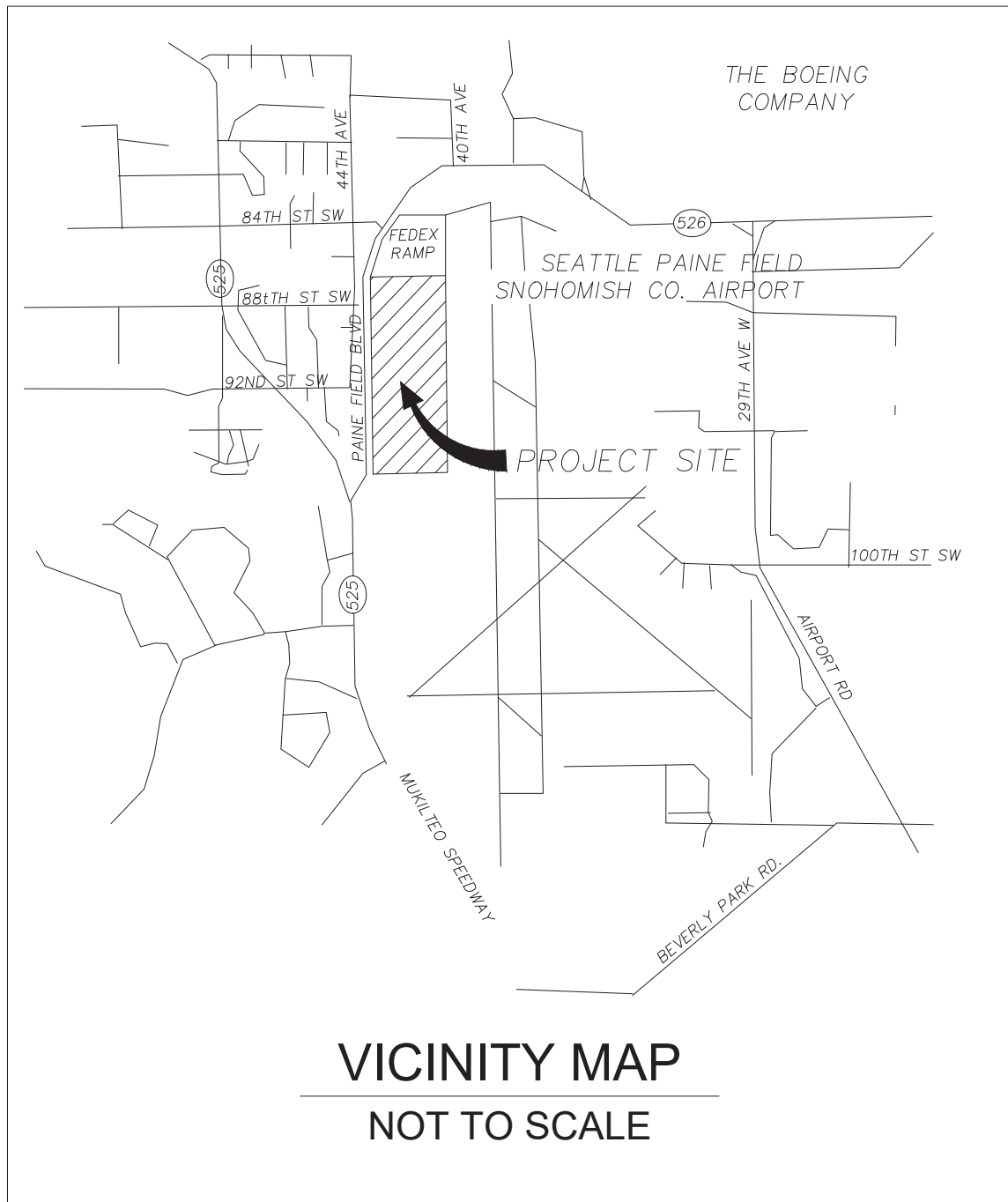
CORPS COMMENTS: All e-mail comments should be sent to ryan.j.cochoit@usace.army.mil.

Conventional mail comments should be sent to: U.S. Army Corps of Engineers, Regulatory Branch, Attention: Ryan Cochoit, 4735 E. Marginal Way S, Bldg 1202, Seattle, Washington, 98134-2388. All comments received will become part of the administrative record and are subject to public release under the Freedom of Information Act including any personally identifiable information such as names, phone numbers, and addresses.

ECOLOGY COMMENTS: Any person desiring to present views on the project pertaining to a request for water quality certification under Section 401 of the CWA and/or Coastal Zone Management consistency decision, may do so by submitting written comments to the following address: Washington State Department of Ecology, Attention: Federal Permitting Section, Post Office Box 47600, Olympia, Washington, 98504-7600, or e-mail to fedconsistency@ecy.wa.gov.

To ensure proper consideration of all comments, responders must include the following name and reference number in the text of their comments: Snohomish County Airport (Westside Aerospace Complex) NWS-2024-940-WRD

Encl: Figures (9)



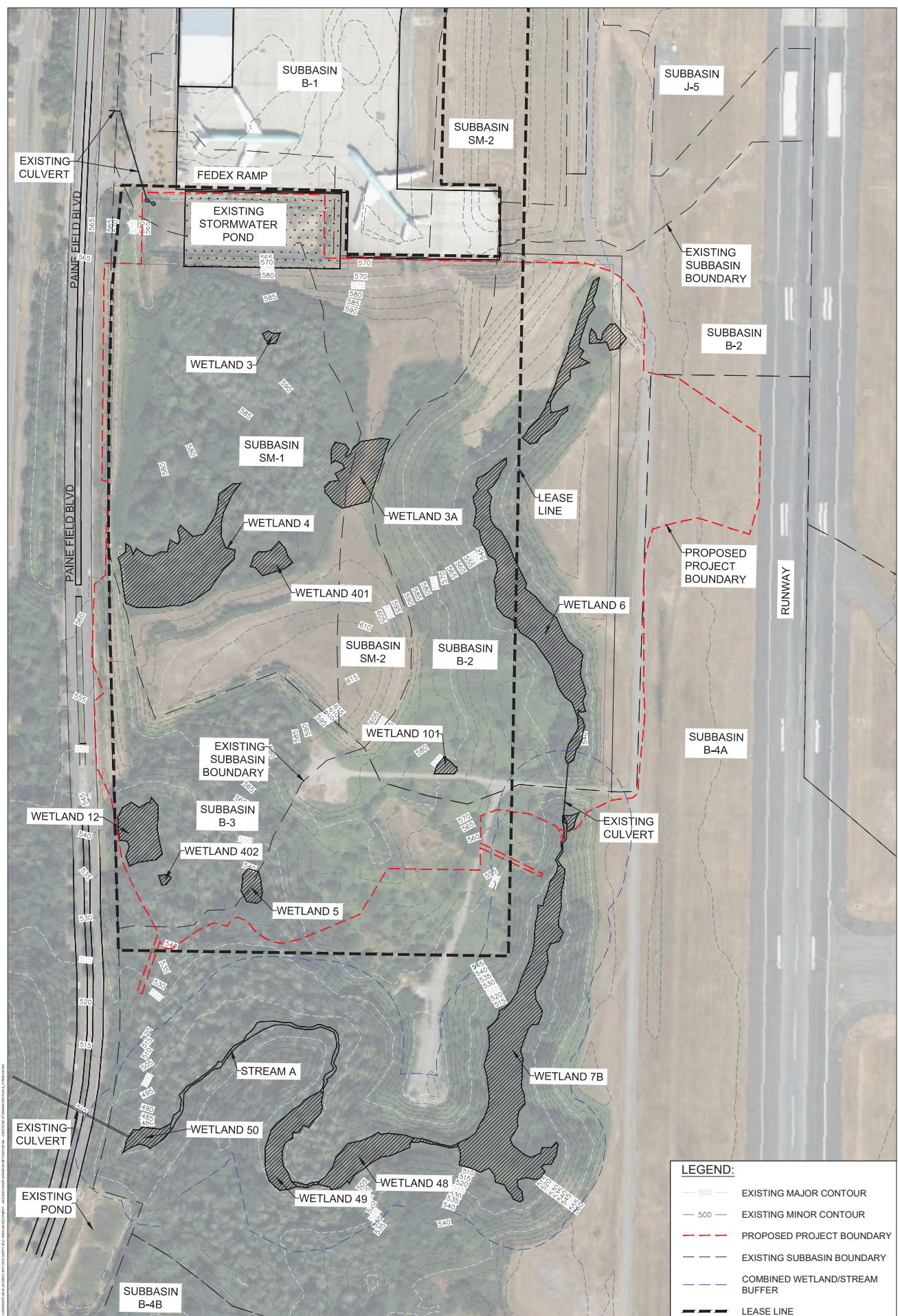
SNOHOMISH COUNTY AIRPORT - PAINE FIELD

CARGO SITE DEVELOPMENT

FIGURE 1. PROJECT VICINITY MAP

OCTOBER 1, 2024

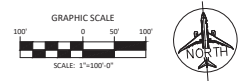


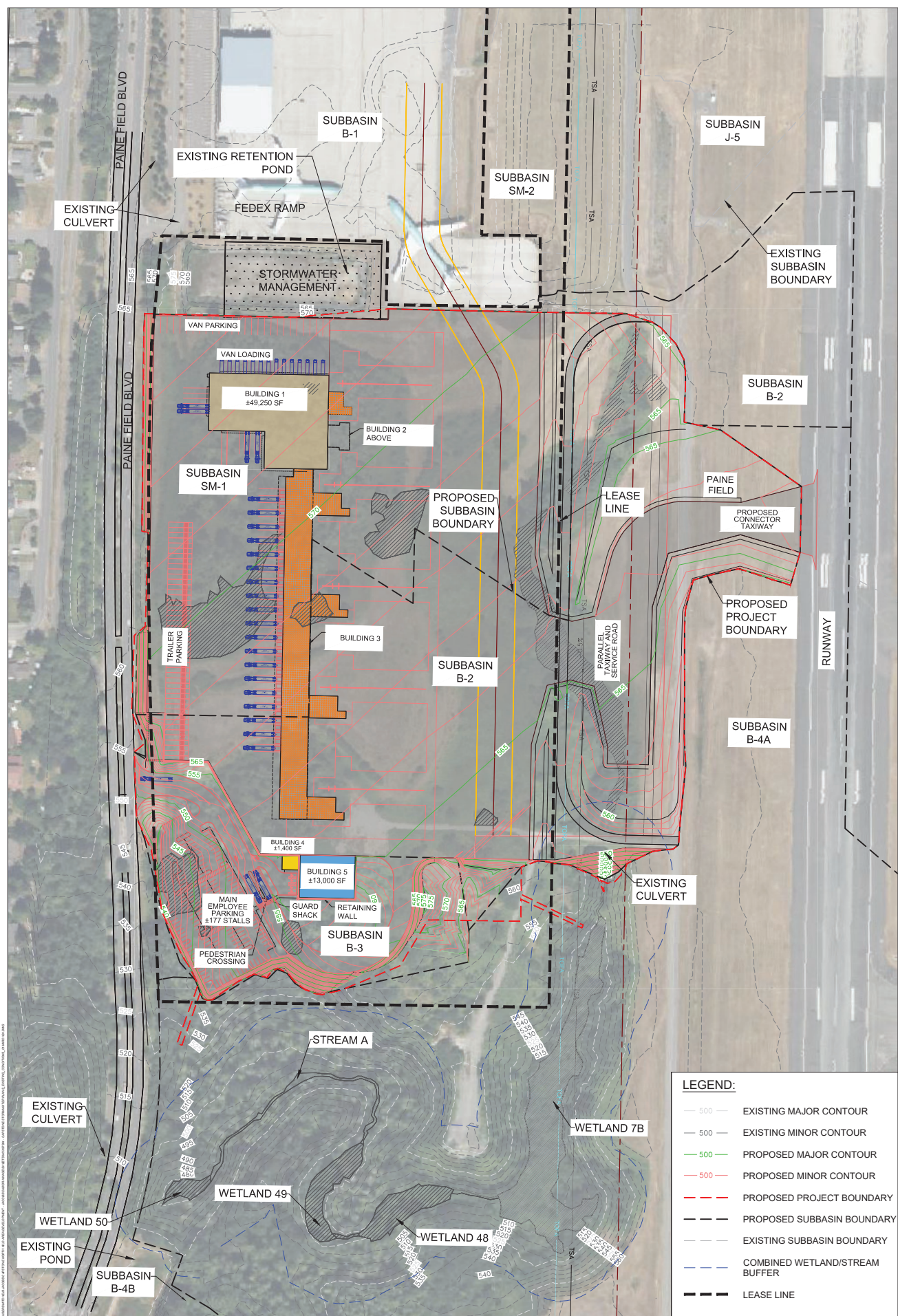


SNOHOMISH COUNTY AIRPORT - PAINE FIELD

CARGO SITE DEVELOPMENT
FIGURE 2. EXISTING CONDITIONS

OCTOBER 1, 2024



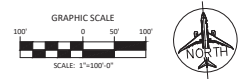


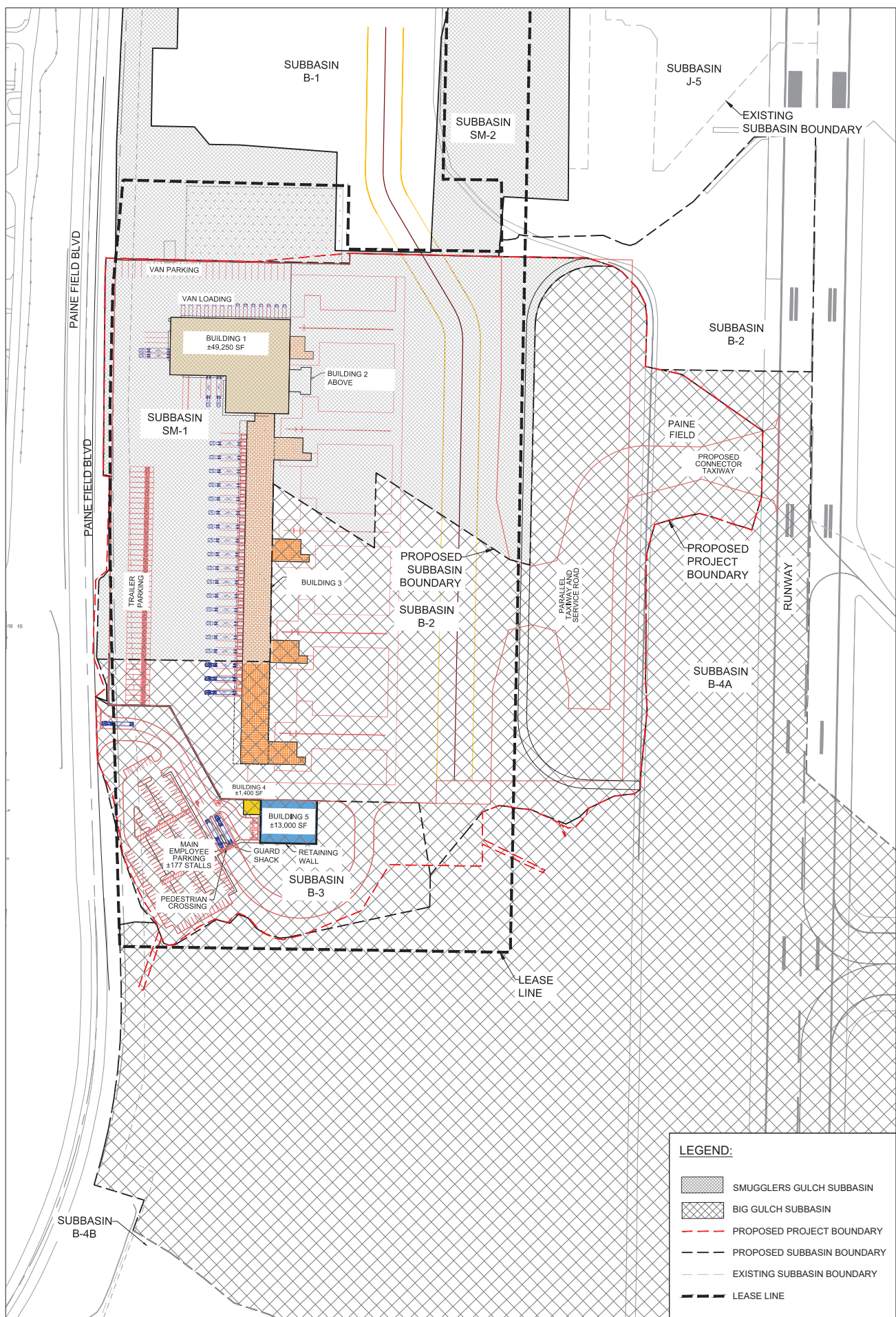
SNOHOMISH COUNTY AIRPORT - PAINE FIELD

CARGO SITE DEVELOPMENT

FIGURE 3. PROPOSED CONDITIONS

OCTOBER 1, 2024



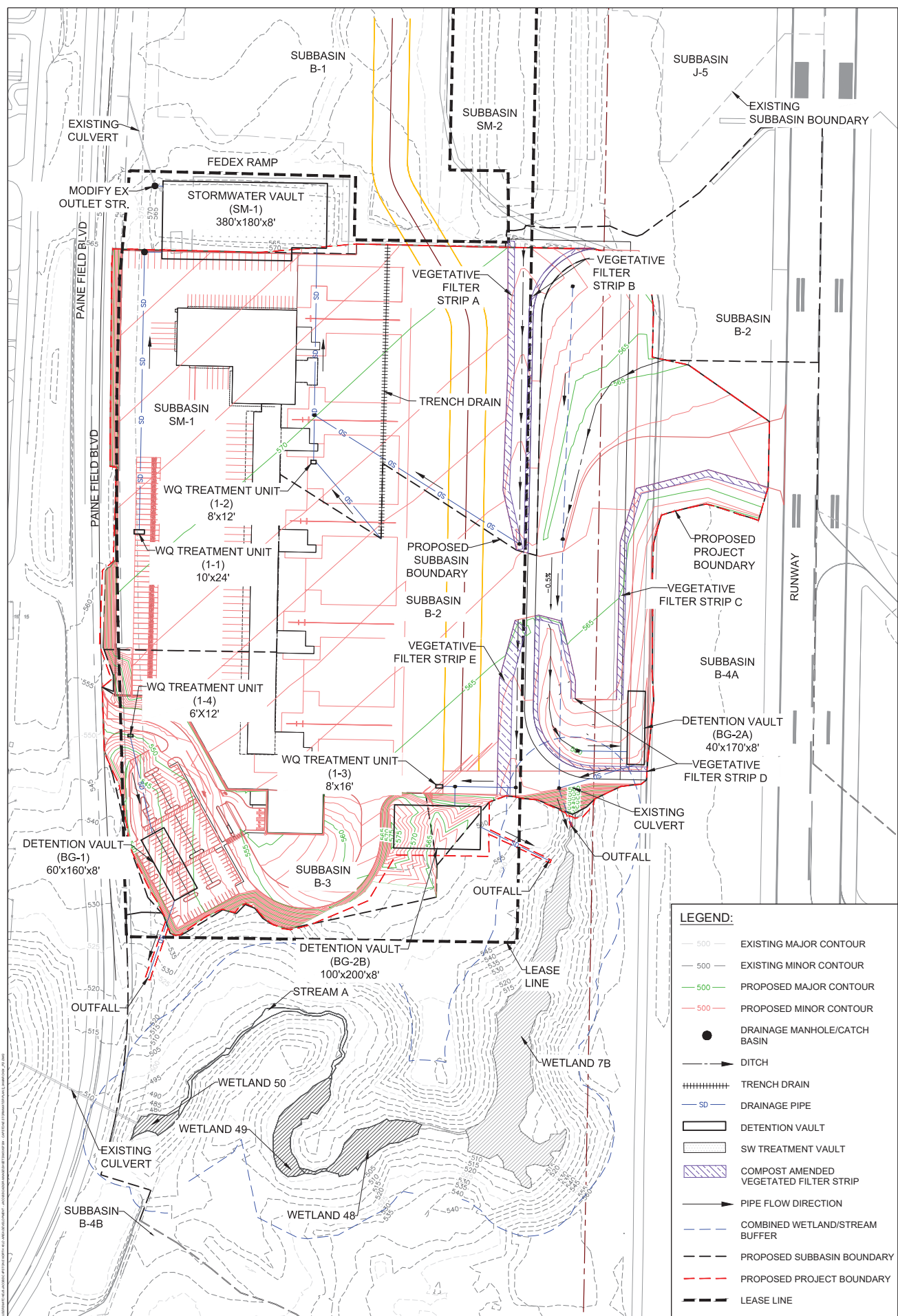


SNOHOMISH COUNTY AIRPORT - PAINE FIELD

CARGO SITE DEVELOPMENT

FIGURE 4. PROPOSED DRAINAGE SUBBASIN BOUNDARIES

OCTOBER 1, 2024

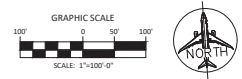


SNOHOMISH COUNTY AIRPORT - PAINE FIELD

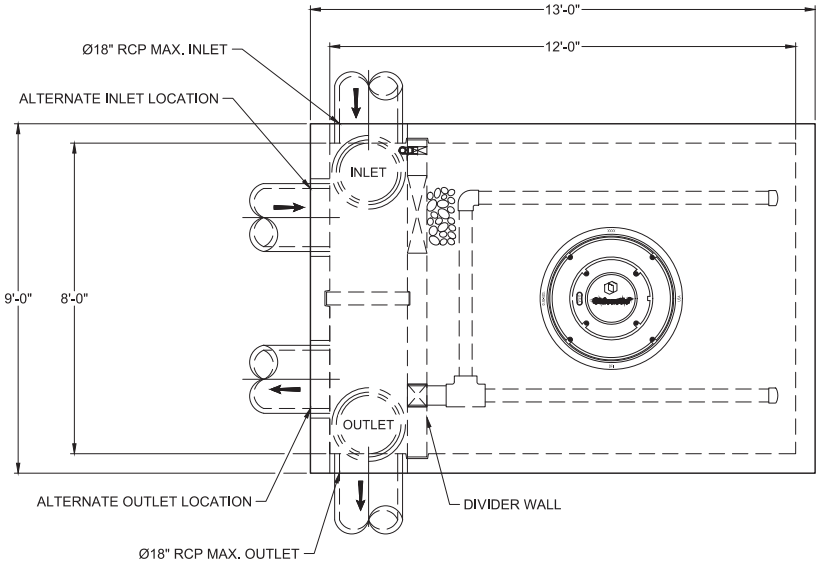
CARGO SITE DEVELOPMENT

FIGURE 5. PROPOSED DRAINAGE FACILITIES

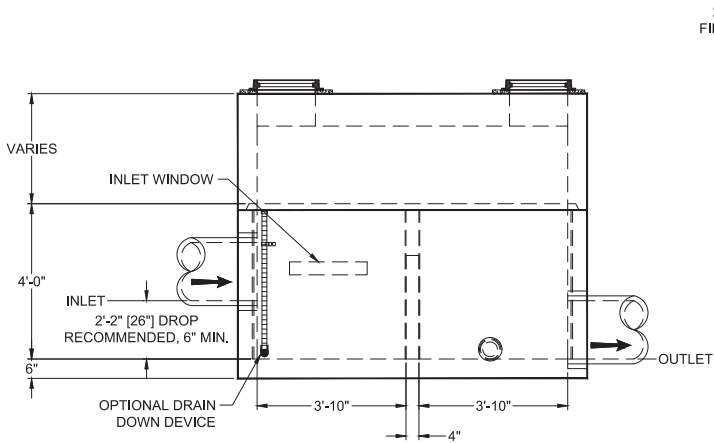
OCTOBER 1, 2024



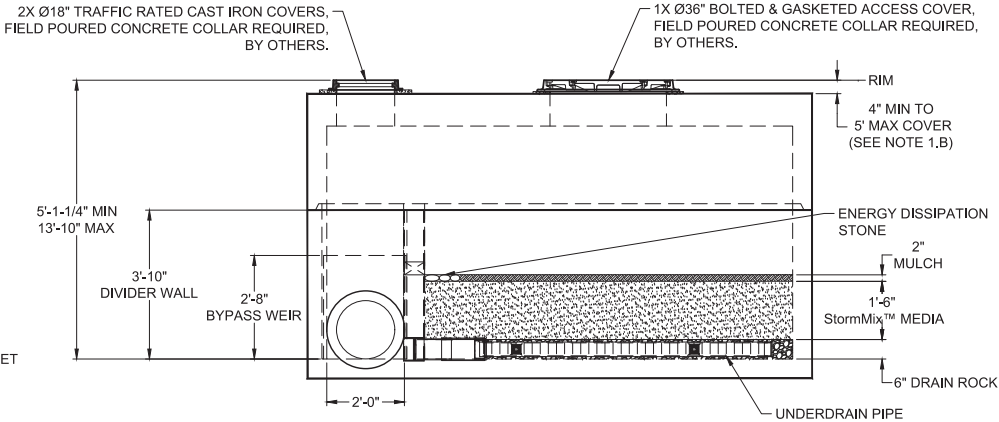
SITE SPECIFIC DATA				
Structure ID				ID
Treatment Flow Rate (cfs)				-
Peak Flow Rate (cfs)				-
Rim Elevation				-
Top of Vault Elevation				-
Pipe Data	Pipe Location	Pipe Size	Pipe Type	Invert Elevation
Inlet	-	-	-	-
Outlet	-	-	-	-
Notes:				
PERFORMANCE SPECIFICATIONS				
Treatment Flow Capacities:*				
NJDEP 80% Removal, 75 micron				0.304 cfs
WA Ecology GULD - Basic, Enhanced & Phosphorus				0.270 cfs
Bypass Capacity				6.5 cfs
*Contact Oldcastle for alternative treatment flow capacities.				



PLAN VIEW



LEFT END VIEW



ELEVATION VIEW

- NOTES:**
- DESIGN LOADINGS:
 - AASHTO HS-20-44 (WITH IMPACT)
 - DESIGN SOIL COVER: 5'-0" MAXIMUM
 - ASSUMED WATER TABLE: BELOW BASE OF PRECAST (ENGINEER-OF-RECORD TO CONFIRM SITE WATER TABLE ELEVATION)
 - LATERAL EARTH PRESSURE: 45 PCF (DRAINED)
 - LATERAL LIVE LOAD SURCHARGE: 80 PSF (APPLIED TO 8'-0" BELOW GRADE)
 - NO LATERAL SURCHARGE FROM ADJACENT BUILDINGS, WALLS, PIERS, OR FOUNDATIONS.
 - CONCRETE 28-DAY MINIMUM COMPRESSIVE STRENGTH: 5,000 PSI MINIMUM.
 - REINFORCING: REBAR, ASTM A615/A706, GRADE 60
 - CEMENT: ASTM C150
 - REQUIRED ALLOWABLE SOIL BEARING CAPACITY: 2,500 PSF
 - REFERENCE STANDARD:
 - ASTM C890
 - ASTM C913
 - ACI 318-14
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 - MAXIMUM PICK WEIGHTS*:
 - TOP: XX XXX LBS
 - BASE: XX XXX LBS* (* COMBINED WEIGHT OF BASE INCLUDES BYPASS WEIR, DIVIDER WALL, ROCK & MEDIA)
 - INTERALS SHALL CONSIST OF UNDERDRAIN PIPE, ROCK, STORMMIX™ MEDIA, MULCH, DIVIDER WALL, BYPASS WEIR AND OPTIONAL DRAIN DOWN.



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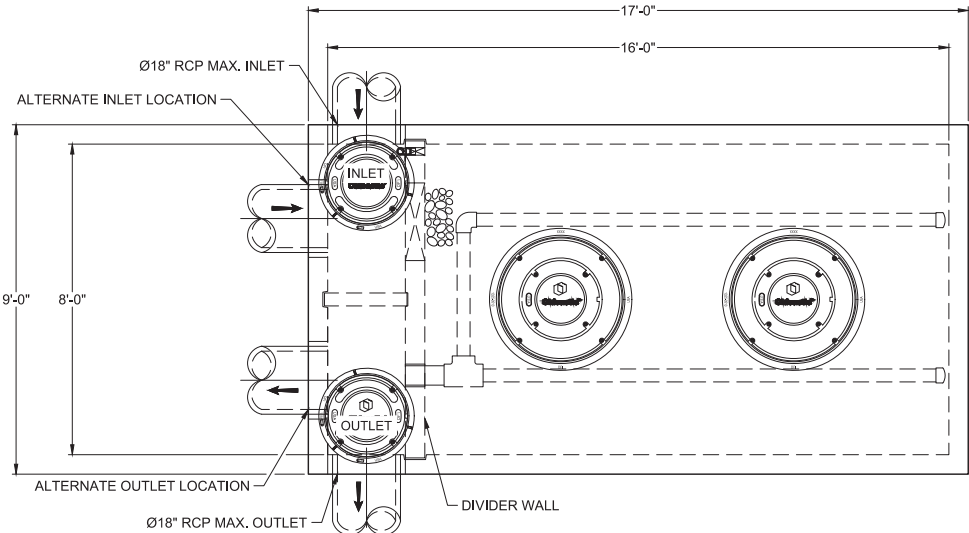
BioPod™ Biofilter System (STANDARD)
 Underground Vault with Internal Bypass

CUSTOMER			
PROJECT NAME			
SHEET NAME			
Revision			
REV DATE			
SHEET			
1 OF 1			

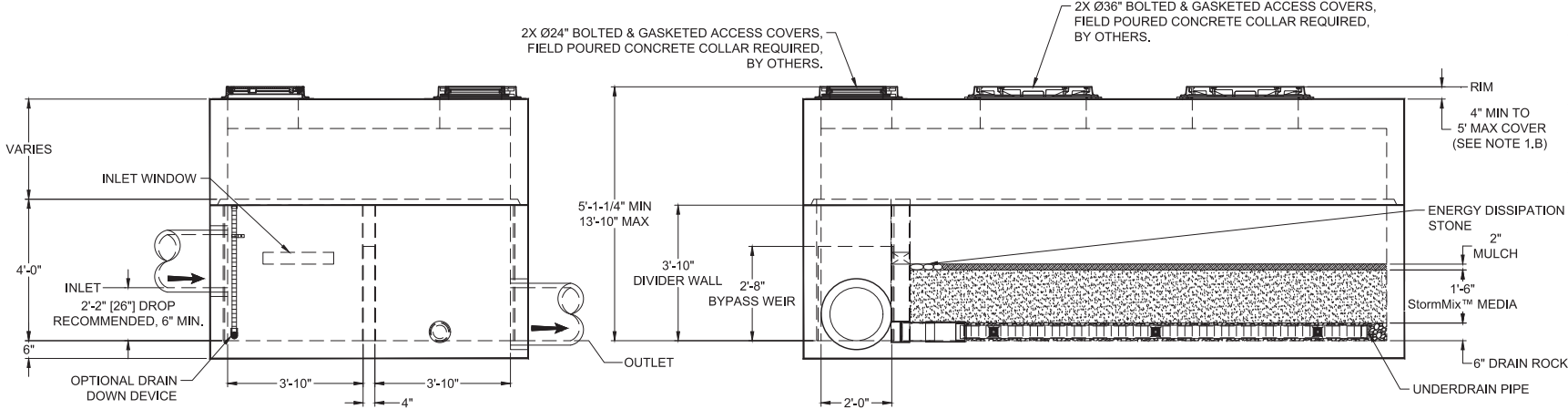
Specifier Drawing
 BPU-8121B



SITE SPECIFIC DATA				
Structure ID				ID
Treatment Flow Rate (cfs)				-
Peak Flow Rate (cfs)				-
Rim Elevation				-
Top of Vault Elevation				-
Pipe Data	Pipe Location	Pipe Size	Pipe Type	Invert Elevation
Inlet	-	-	-	-
Outlet	-	-	-	-
Notes:				
PERFORMANCE SPECIFICATIONS				
Treatment Flow Capacities:*				
NJDEP 80% Removal, 75 micron				0.432 cfs
WA Ecology GULD - Basic, Enhanced & Phosphorus				0.384 cfs
Bypass Capacity				6.5 cfs
*Contact Oldcastle for alternative treatment flow capacities.				



PLAN VIEW



LEFT END VIEW

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BioPod™ Biofilter System (STANDARD)
Underground Vault with Internal Bypass

CUSTOMER

PROJECT NAME

SHEET NAME

REVISION

REV DATE

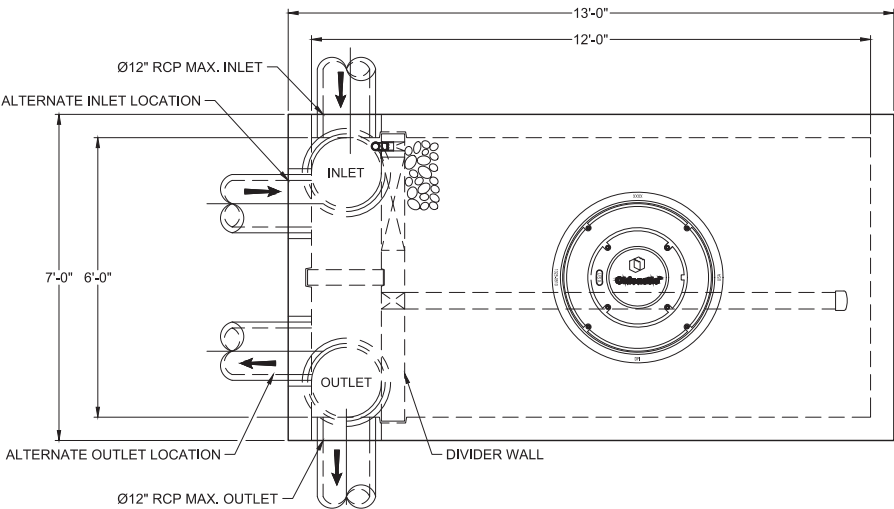
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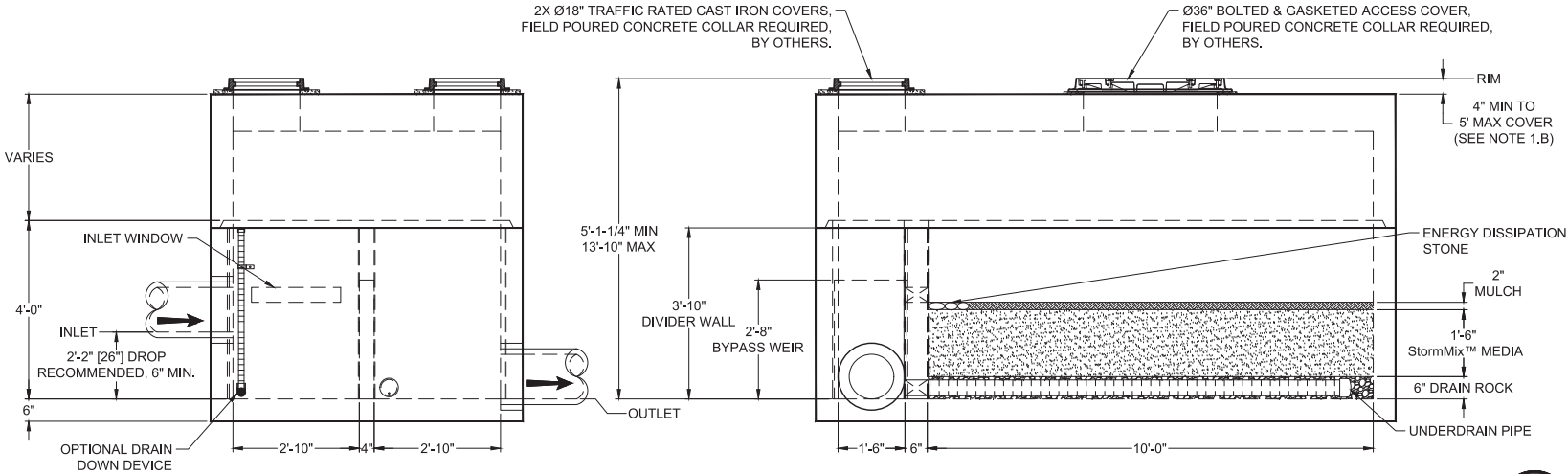
Specifier Drawing BPU-8161B



SITE SPECIFIC DATA					
Structure ID			ID		
Treatment Flow Rate (cfs)			-		
Peak Flow Rate (cfs)			-		
Rim Elevation			-		
Top of Vault Elevation			-		
Pipe Data	Pipe Location	Pipe Size	Pipe Type	Invert Elevation	
Inlet	-	-	-	-	
Outlet	-	-	-	-	
Notes:					
PERFORMANCE SPECIFICATIONS					
Treatment Flow Capacities:*					
NJDEP 80% Removal, 75 micron				0.240 cfs	
WA Ecology GULD - Basic, Enhanced & Phosphorus				0.213 cfs	
Bypass Capacity				5.0 cfs	
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BioPod™ Biofilter System

(STANDARD)

Underground Vault with Internal Bypass

CUSTOMER

-

PROJECT NAME

-

SHEET NAME

Specifier Drawing

REVISION

-

REV DATE

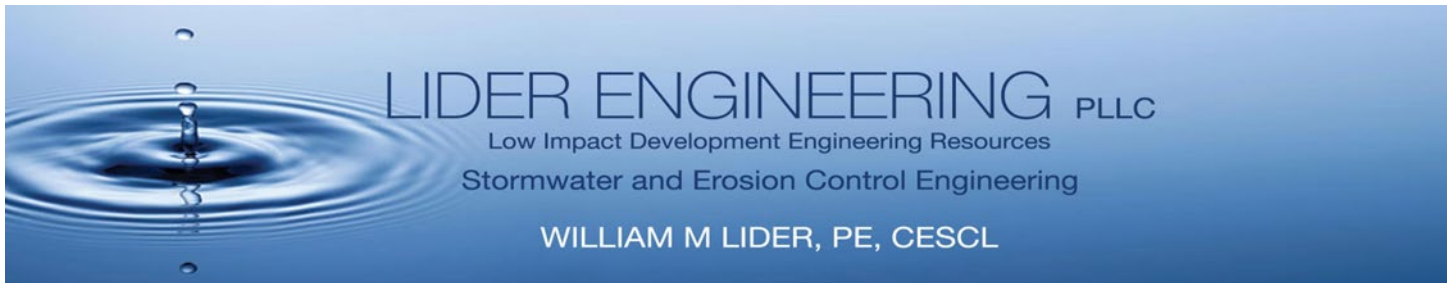
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1 OF 1

BPU-612IB





TRANSMITTED BY EMAIL

March 14, 2025

Department of Ecology—SEA Program
Federal Permit Unit
ecyrefedpermits@ecy.wa.gov

SUBJECT: Snohomish County Paine Field Airport (PAE)
Westside Aerospace Complex, Water Quality Certification (WQC)
Supplemental Comments of William Lider, PE
Ecology Aquatics ID Number: 143467

In an episode from *The Simpsons*, Montgomery Burns drives a dump truck up to Lake Springfield loaded with barrels leaking, green-glowing, radioactive waste. The sign at the lake says, “No Dumping, \$10,000 Fine”. Mr. Burns then dumps all the drums into the lake, gets out, reaches into his vest pocket, pulls out \$10,000, and flings the bills into the lake. Mr. Burns then dusts his hands off and drives away, having paid his fine for dumping to the lake.

The foregoing is a perfect vignette illustrating the efficacy of PAE’s proposed mitigation for the loss of 2.7 acres of wetlands in the headwaters of the Big Gulch and Smuggler’s Gulch drainage basins. Purchasing banked wetland credits in another drainage basin, in a completely different watershed will provide absolutely zero mitigation for the loss of ecological and hydrological benefits afforded to these two creeks from the loss of 2.7 acres of their headwater wetlands.

Simply throwing money away on meaningless and worthless wetland mitigation in order to get a project permitted, is not mitigation.

Supporting Documents Reviewed

The following seven supporting documents to PAE’s Water Quality Certification application were provided to Lider Engineering on March 10, 2025 by Ecology, as a partial response to a public records request and were reviewed for these supplemental comments:

1. Mitigation Bank Use Plan, dated October 1, 2024, Ryan Kahlo, PWS Sr. Ecologist, FACET;
2. Delineation Survey Drawing, undated, unsealed, with no identification of its origin;
3. On Site Buffer Mitigation Plan, dated September 20, 2024, unsealed, JACOBS;
4. Pre-Filing Meeting Request Form Clean Water Act Section 401 Water Quality Certification, dated November 11, 2024, preparer’s signature is illegible;

5. Biological Assessment, dated November, 2024, prepared by Ryan Kahlo, PWS. Senior Ecologist, FACET;
6. Draft Stream & Wetland Delineation Report, dated May 2022, prepared by Hugh Mortensen, PWS, the Watershed Company; and
7. Technical Memorandum, Re: Wetland Delineation Addendum, dated May 31, 2024, by Sage Yuasa, FACET.

While the foregoing seven documents are essential to a complete review, Ecology has been unable or unwilling to make these documents generally available to the public, without the filing of a formal public records request pursuant to Chapter 42.56 RCW. At the request of Lider Engineering, the comment period for this WQC public comment period was extended to March 31, 2025 due to the delay in furnishing these documents. Other reviewers who wish to make public comments may also wish to request a time extension for public comment, until such time these documents are made generally available for public review on Ecology's website, without the delay of going through the public disclosure process that can take a month or longer.

Supplemental Comments:

1. Mitigation Bank Use Plan

- A. The mitigation bank use plan states that, "The mitigation banks are intended to replace wetland and buffer functions within the same watershed as in which the project is located.¹" This statement is incorrect. The project is located in WRIA 8 while the proposed mitigation bank is located in WRIA 7. These are different watersheds.
- B. [WAC 173-700-302](#) mandates that the mitigation bank credits demonstrate that the ecological and hydrological benefits of the bank extend beyond the bank site location. Here the proposed mitigation bank credits, in a different WRIA, provide no ecological or hydrological benefits to either Big Gulch Creek or Smuggler's Gulch Creek. There is no restoration of hydrological or ecological processes within the two creek's drainage basin. Nowhere in the mitigation bank use plan is WAC 173-700-302 addressed.
- C. Big Gulch Creek referred to as Steam A is designated as Type F, or a fish bearing stream. 40-feet of Big Gulch Creek will be lost as the result of this project. This constitutes a significant take that will adversely affect fish in the creek. No mitigation has been proposed for this significant impact.
- D. Page 10, paragraph 3 states in part that, "The lost water quality and hydrologic functions of the impacted project area wetlands will be substantially replaced through the proposed stormwater management system for the completed project,

¹ Reference Mitigation Bank Plan, Introduction, Page 1, 2nd para.

which will incorporate flow control and water quality treatment.² This statement is incorrect. All rainfall will only be detained for approximately 24-hours before running off, rather than stored in the wetlands for later release as shallow groundwater flow in later summer. Both Big Gulch and Smuggler's Gulch Creeks are designated by Ecology as "Core Summer Salmonid Habitat". The project as designed will not protect the hydrologic functions of either creek. The project must be redesigned to provide retention, similar to what is currently provided by the wetlands that will be obliterated as a part of the proposed Westside Complex project.

- E. Appendix B, Restoration Plan and Appendix C, Critical Areas Study are missing. These missing or omitted documents must be provided for public review, before approval of the WQC by Ecology.

2. Delineation Survey Drawing

It is unknown when this survey drawing was prepared, who prepared the survey drawing, or what the preparer's qualifications are. This drawing cannot be considered by Ecology until such time that it placed on the preparer's firm title block; and is dated and sealed by a professional land surveyor licensed in the State of Washington. Furthermore, this drawing constitutes a violation of WAC 196-23-020, Seal/stamp usage.

All reports relying on this wetland delineation survey must be held in abeyance or rejected until such time as the flagged wetlands are surveyed and a drawing is prepared and sealed by a professional land surveyor.

3. On Site Buffer Mitigation Plan

No comment at this time.

4. Pre-Filing Meeting Request Form Clean Water Act Section 401 Water Quality Certification

Section V of the Pre-Filing Meeting Request Form Clean Water Act Section 401 Water Quality Certification indicates that:

Total Fill Area & Type(s) of Material (square feet), if known:

(Waterbody and/or Wetland(s) Impacted) 65,494 square feet of wetland.

Total Excavation Area (square feet), if known:

(Waterbody and/or Wetland(s) Impacted) 56,514 square feet of wetland

65,494-squarefeet plus 56,514-squarefeet equals 122,008-squarefeet, or just over 2.8-acres. Other documents submitted indicate that wetland impacts will be 2.7-acres. Please explain this ambiguity.

² Reference Mitigation Bank Plan, Page 10, Section 5.1, 2nd para.

5. Biological Assessment (BA)

- A. The BA does not address the impacts from the loss of 2.7 acres of wetlands to the Core Summer Salmonid Habitat in Big Gulch and Smuggler's Gulch Creeks. Explain how a mitigation bank in a different drainage basin and a different watershed will mitigate for the loss of summer stream by purchasing mitigation credits in Narbeck Wetland Bank located in Narbeck Creek.
- B. Figure 2, page 8 does not show the location of wetland 7A shown in the onsite Buffer Mitigation Plan. Explain how it will be protected and maintained if it is not called out.
- C. There are a number of threatened species identified including but not limited to Chinook Salmon, Southern Resident Orca, Marbled Murrelet, Steelhead, and Bull Trout that are likely to be adversely affected by this project. This adverse impact is magnified by the fact that the BA completely ignores the harm to the Core Summer Salmonid Habitat that will be lost when 2.7 acres of wetlands are eliminated.
- D. No mitigation is proposed for the harm to essential fish habitats (ESF) areas by the elimination of wetlands providing stormwater storage for release in the summer months when flow is low, water temperatures are high, and dissolved oxygen levels are low.
- E. Appendix B, Stormwater Plan, Flow Control Model Output Summary for SM-1, the WWHM calculations indicate a pre-existing pond (e.g. impervious) surface. This pond must be modeled as forested in the predeveloped condition (reference pdf page 118).
- F. Appendix B, Stormwater Plan, Flow Control Model Output Summary for SM-1, a vault depth as 5.5-feet (active storage 4.5-feet); yet Figure 5, pdf page 74 calls the vault depth out as 8-feet. Correct the WWHM calculations or resolve this ambiguity.
- G. Appendix B, Stormwater Plan, Section 4.6 Wetland Protection (Minimum Requirement 8), 2nd paragraph states in part, "...all impacted wetlands are subject to General Protection and Protection from Pollutants, as well as subject to the Wetland Hydroperiod³ Protection through site discharge modeling." WWHM calculations provided demonstrate that the downstream wetland water depth fluctuation and depth will not be protected and failed for every month of the year to maintain wetland (reference pdf pages 199-206).

The project must be redesigned such that the WWHM calculations demonstrate that wetland hydroperiods will be protected.

³ Hydroperiod protection means maintaining the annual fluctuations in water depth and its timing as closely as possible.

6. Draft Stream & Wetland Delineation Report

The wetland delineation report documents high groundwater at all wetlands to be filled. This is an important observation as the high groundwater is slowly released during low flow summer drought conditions. This high groundwater condition will be eliminated when the surface above is sealed off by impervious surfaces. In turn, significant adverse impacts to the Core Summer Salmonid Habitats will adversely affect essential fish habitat.

Without site access, it is impossible for an independent wetlands expert to verify site conditions and wetland scorings used to categorize these wetlands.

7. Technical Memorandum, Re: Wetland Delineation Addendum

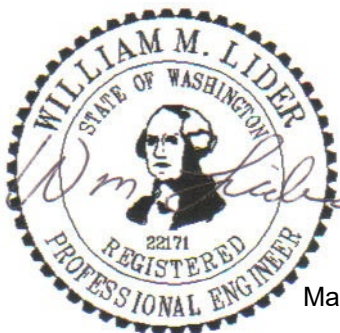
No comments at this time.

Conclusion

For all the above reasons, Ecology must deny the subject project's water quality certification until such time that adequate and meaningful mitigation is provided for the loss of 2.7 acres of wetlands and degradation to Core Summer Salmonid Habitat.

The foregoing comments should be considered preliminary, and I may wish to augment them at a later date as additional information on these projects becomes available.

Respectfully submitted,
LIDER ENGINEERING, PLLC

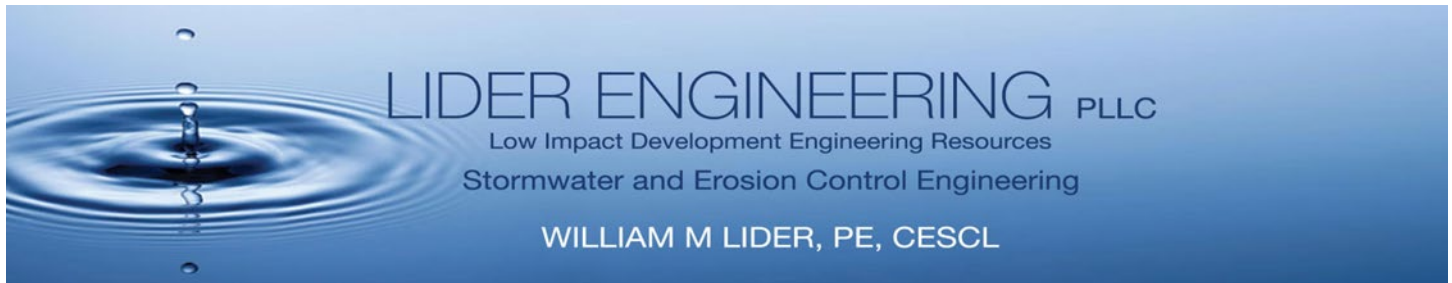


March 14, 2025

William Lider, PE, CESCL
Principal Engineer

Attachment: Lider Engineering Comment Letter March 6, 2025

cc: Jim Thornton, Governor's Office of Regulatory Innovation and Assistance;
Laurie Dumar, Loree'L Randall, Department of Ecology;
Joe Marine, Mayor, Mukilteo City Council, Matt Nienhuis, Public Works Director,
Meiring Borchers, Surface Water Manager, City of Mukilteo;
Todd Gray, Tulalip Tribes;
Tom Murdoch, NW Stream Center
Eric Adman, Sno-King Watershed Council
Marjorie Fields, Nancy Johnson, Snohomish County Chapter Sierra Club;
Diane Buckshnis, Joe Scordino, Edmonds Environmental Council
Eliza Aronson, The Everett Herald
Numerous Concerned Citizens



TRANSMITTED BY EMAIL

March 6, 2025

Department of Ecology—SEA Program
Federal Permit Unit
ecyrefedpermits@ecy.wa.gov

SUBJECT: Snohomish County Paine Field Airport (PAE)
Westside Aerospace Complex, Water Quality Certification (WQC)
Ecology Aquatics ID Number: 143467
Preliminary Comments of William Lider, PE
Request for Comment Period Time extension

Section 401 Water Quality Certification (WQC) and JARPA applicant Snohomish County Paine Field Airport (PAE) proposes to fill 2.7 acres of wetlands and 40 linear feet of Big Gulch Creek (Stream A) to construct a new aerospace facility and attendant features that will disrupt the current hydrology in the headwaters of Big Gulch and Smuggler's Gulch Creeks, without adequate or meaningful mitigation.

The proposed mitigation for the loss of 2.7 acres of wetlands will not maintain the treatment, the functions, and the values of the wetlands fish & wildlife habitat, or the buffers required to offset the impacts to critical areas functions and values of the two creeks. The project as currently proposed will result in an adverse net impact from the loss of critical area functions and values in their watershed.

Downstream reaches of Big Gulch and other Puget Sound coastal streams like Smuggler's Gulch Creek provide critical habitat and is used as rearing areas for federally listed threatened Chinook salmon¹, the primary prey species for the threatened Orca whales. Wetlands act like sponges, soaking up and retaining winter rainfall, then slowly releasing the water in summer months, when stream baseflow is low. This critical base flow will be lost with the proposed concrete vault detention; and mitigation in a different watershed (WRIA) and a different stream basin will provide absolutely no mitigation for Big Gulch and Smuggler's Gulch creeks.

For the reasons listed below, it is requested that Ecology disapprove the subject permit application.

¹Reference *JUVENILE CHINOOK SALMON REARING IN SMALL NON-NATAL STREAMS DRAINING INTO THE WHIDBEY BASIN*, E.M. Beamer, et.al., December 3, 2013

1. WQC Permit Application is Incomplete

The following documents are referenced in the subject WQC application, but were not posted on Ecology's website for public review:

- Westside Aerospace Complex Bank Use Plan prepared by Facet included with the application materials;
- Wetland mitigation bank use plan, submitted 11/12/2024
- Wetland delineation report with data sheets, submitted 11/12/2024;
- BA report, submitted 11/12/2024;
- Riparian revegetation, restoration, and management measures, submitted 11/12/2024; and
- Any other attachments, emails, or documents related to the subject project that have been submitted to Ecology, but were not included in the online public notification posting.

The aforementioned documents are critical to a complete review of the WQC application; however, Ecology has insisted that I, and any other reviewer, must file a public records request to obtain these documents, which I did on March 4, 2025. Ecology then notified me that the above documents will not be provided until April 2, 2025, two-weeks after the deadline for public comment. I then requested both Ecology and the Governor's Office for Regulatory Innovation & Assistance to require Ecology to withdraw the subject WQC advertisement and to re-advertise it after all the pertinent documents relating to the WQC have been posted on Ecology's website.

On March 5, 2025 in personal communication on with Loree'L Randall, Ecology's Shorelands and Environmental Assistance Program Manager, Ms. Randall indicated that the missing documents would be provided only to Lider Engineering sometime next week; however, the emails will only be provided in about a month. Ms. Randall also indicated that the missing documents from the WQC advertisement would not be made publicly available to other reviewers on Ecology's website. Should other reviewers wish to view these documents, they will each need to make separate public records requests and wait approximately 1-month to receive the above information that was not posted by Ecology. Ms. Randall also indicated that the 21-day comment period will be re-started next week, after Lider Engineering has received the missing documents.

2. Core Summer Salmonid Habitat

Big Gulch Creek and Smuggler's Gulch Creek both provide core summer salmonid habitat as described in Ecology's Water Quality Atlas² shown if Figure 1 below:

² Map Source:

<https://apps.ecology.wa.gov/waterqualityatlas/wqa/map?CustomMap=y&RT=1&Layers=30&Filters=n%2cy%2cn%2cn&F2.1=0&F2.2=0&BBox=-14338616%2c5395963%2c-12562831%2c6503994>

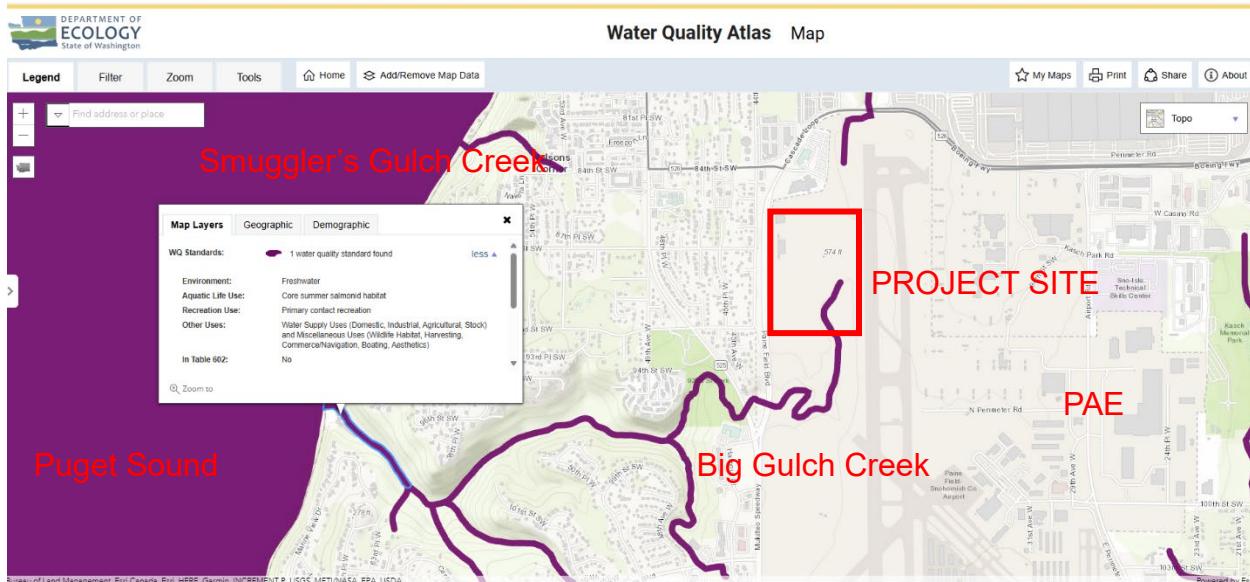


Figure 1: Annotated clip from Ecology's Water Quality Atlas showing Big Gulch Creek and Smuggler's Gulch Creek as Core Summer Salmonid Habitat. This habitat will be degraded by the elimination of 2.7 acres of wetlands that soak up winter rains and gradually release the stormwater in summer months. Mitigation in another watershed (WRIA) or a different stream basin will not mitigate the loss of these wetlands or habitat loss/degradation for federally listed, threatened non-natal juvenile Chinook salmon.

3. Mitigation proposed for wetland loss is ineffective

PAE proposes to compensate the 2.7 acre wetland loss and 40-feet of stream loss by purchasing mitigation credits through the Paine Field Wetland Compensation Bank. The proposed use of banked mitigation credits will not maintain the treatment, the functions, and the values of the wetland, and fish and wildlife habitat conservation area or buffer to offset the impacts to critical area functions and values on the project site such that the total net impact will be no net loss of critical area functions and values in the watershed. Core summer salmonid habitat, critical to the life cycle of threatened Chinook salmon and other salmonids that will be degraded or destroyed by the proposed project as currently designed.

PAE erroneously states in the WQC application that the project is in the same watershed as the mitigation bank proposed for this project—*it is not*. The Paine Field Wetland Compensation Bank is located in a different WRIA (Water Resource Inventory Area) as the proposed Airport development. The Airport project is located in WRIA 8, while the mitigation bank is located in WRIA 7, a completely different watershed. Doing wetland mitigation in a different stream basin, let alone a different watershed will not provide equivalent treatment of the functions and values of the wetlands at the headwaters to Big Gulch Creek. The wetland mitigation proposed by PAE is worthless.

[WAC 173-700-301](http://wac.173-700-301) Service area states:

- (1) The department must determine the appropriate service area for proposed banks.
- (2) The sponsor must provide a detailed text description and a map of the bank's proposed service area in the instrument.
- (3) The maximum extent of a service area shall be the WRIA in which the bank is located, except when inclusion of portions.

The proposed wetland mitigation banked credits are not in the appropriate service area. The text description and map of the proposed bank's service area was either not submitted or has been withheld from public review, pending a response to the Lider Engineering Public Records Request. Big Gulch Creek and Smuggler's Gulch Creek are well beyond the maximum extent of service area provided the Narbeck and Swanson Wetland Mitigation Banks.

[WAC 173-700-302](#) Considerations for determining service area size, states in part:

The department considers the following elements when determining the size of the service area:

(3) How far the ecological and hydrological benefits of the bank extend beyond the bank site location;

(5) The degree to which the bank restores processes within the watershed;

(7) The quality, diversity, and regional significance of the habitats provided;

(8) Local needs and requirements, such as consistency with land use or watershed management plans;

(9) Types of impacts that may be compensated through the use of credits from the bank;

Here the proposed mitigation bank credits, in a different WRIA, provide no ecological or hydrological benefits to either Big Gulch Creek or Smuggler's Gulch Creek. There is no restoration of hydrological or ecological processes within the two creek's drainage basin. The loss of wetlands that help store water for summer runoff will be lost and there will be zero compensation for the loss of Core Summer Salmonid Habitat using banked credits in a WRIA 7 wetland mitigation bank.

Furthermore, Snohomish County Code, [SCC 30.62A.550.2\(b\)](#) states:

(b) The use of the mitigation bank will result in equivalent treatment of the functions and values of the wetland, fish and wildlife habitat conservation area or buffer to offset the impacts to critical areas functions and values on the project site such that the total net impact will be no net loss of critical area functions and values in the watershed in which the impacts will occur. For the purposes of this section, "watershed" means an area identified as a state of Washington water resource inventory area (WRIA) under WAC [173-500-040](#).

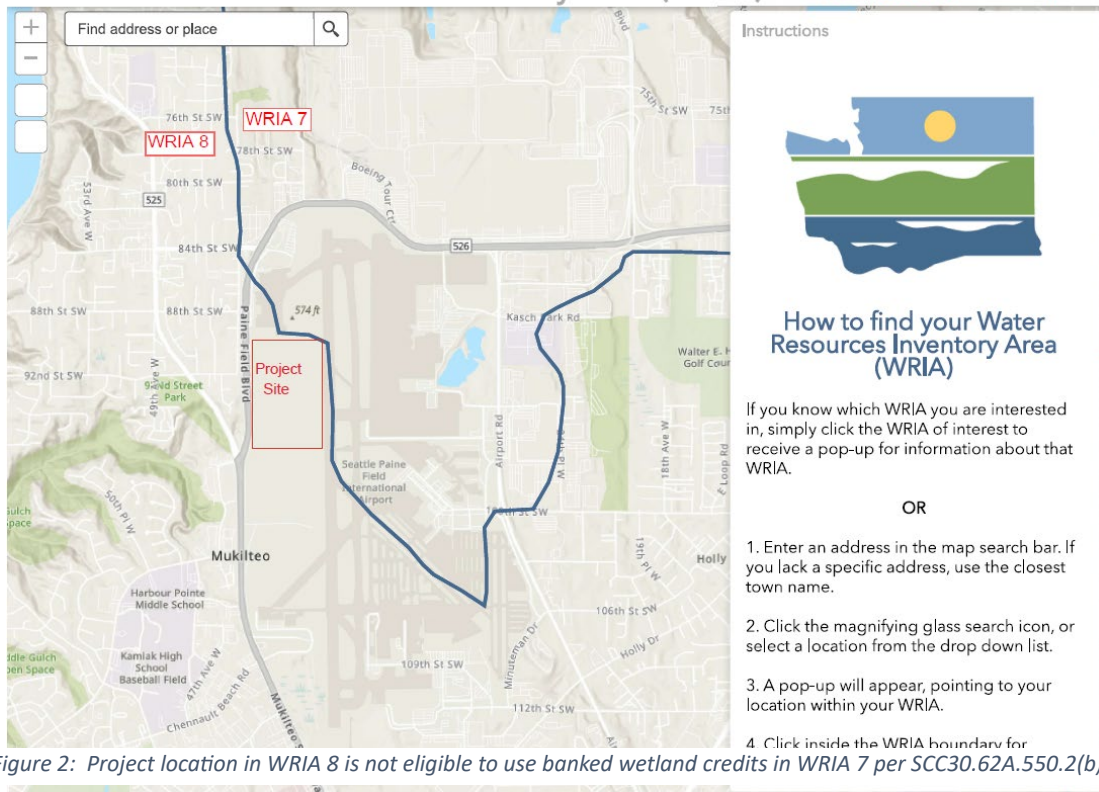
The Figure 2 map³ below shows the proposed watershed (WRIA) boundary at the PAE project site. The project is mostly in the Big Gulch Creek drainage basin, but also partly in the Smuggler's Gulch Creek drainage too. Both of these drainage basins are in WIRA 8, while the Paine Field Wetland Compensation Bank is in WRIA 7.

³ Map Source:

<https://gis.ecology.wa.gov/portal/apps/webappviewer/index.html?id=616124573214451692109e1e2971b548>

Find Your Water Resources Inventory Area (WRIA)

Prepared by Wm. Lider
January 9, 2025



Snohomish County Code explicitly prohibits using mitigation banked credits in a different watershed (WRIA); however, even if the Snohomish County code did allow banked credits in another watershed, or if Snohomish County were to issue a code waiver, modification, or deviation (WMD) to permit this project, it still would not provide equivalent mitigation for the loss of core salmonid summer habitat for threatened species in Big Gulch Creek.

4. Threatened Species not addressed

The loss of 2.7 acres of wetlands as well as 40-feet of stream will result in unmitigated harm to non-natal, juvenile Chinook salmon in Big Gulch Creek. The threatened species use of Big Gulch Creek by Chinook salmon has been documented in the December 3, 2013 report, *JUVENILE CHINOOK SALMON REARING IN SMALL NON-NATAL STREAMS DRAINING INTO THE WHIDBEY BASIN*, E.M. Beamer, et.al.

Because Big Gulch Creek is a critical link in the Chinook salmon's life cycle, it constitutes *Essential Fish Habitat* under the [Magnuson-Stevens Fishery Conservation and Management Act](#), as amended by the Sustainable Fisheries Act of 1996, and reauthorized in 2007. This Act requires NOAA to identify measures to avoid, reduce, or compensate for adverse impacts to fish habitat and ensure that publicly-funded projects do not carelessly destroy habitat, as is the case here. There is no indication in documents provided to date that any consultation with NOAA has occurred.

Before proceeding further, additional study and a report is required by independent, competent fisheries biologist to evaluate the loss of these wetlands and their impact to the Big Gulch and Smuggler's Gulch stream systems.

5. Basin stream flows must be maintained

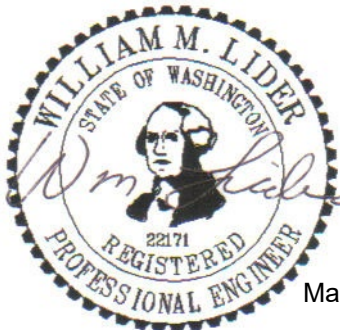
Basin stream flows must be maintained, pursuant to Minimum Requirement 4: Preservation of Natural Drainage Systems and Outfalls, [SCC 30.63A.520](#). There is no discussion of any differentiation between the Smuggler's Gulch Creek and Big Gulch Creek which must be addressed. Runoff from a concrete vault (e.g. detention) is not the same as runoff from a wetland (e.g. retention).

Conclusion

For all the above reasons, Ecology must deny the subject project's water quality certification until such time that adequate and meaningful mitigation is provided for the loss of 2.7 acres of wetlands and degradation to Core Salmonid Summer Habitat.

The foregoing comments should be considered preliminary, and I may wish to augment them at a later date as additional information on these projects becomes available.

Respectfully submitted,
LIDER ENGINEERING, PLLC



March 6, 2025

William Lider, PE, CESCL
Principal Engineer

Attachment: WQC Permit Application, Ecology Aquatics ID No.: 143467

cc: Jim Thornton, Governor's Office of Regulatory Innovation and Assistance;
Laurie Dumar, Loree'L Randall, Department of Ecology;
Joe Marine, Mayor, Mukilteo City Council, Matt Nienhuis, Public Works Director,
Meiring Borchers, Surface Water Manager, City of Mukilteo;
Todd Gray, Tulalip Tribes;
Tom Murdoch, NW Stream Center
Eric Adman, Sno-King Watershed Council
Marjorie Fields, Nancy Johnson, Snohomish County Chapter Sierra Club;
Diane Buckshnis, Joe Scordino, Edmonds Environmental Council
Eliza Aronson, The Everett Herald
Numerous Concerned Citizens



**Request for Clean Water Act
Section 401 Water Quality Certification
Washington State Department of Ecology**
Phone: (360) 407-6076 or E-mail: ecyrefedpermits@ecy.wa.gov

AGENCY USE ONLY

Date Received: 2/6/2025
Aquatics ID No.: 143467
County: Snohomish
Complete Request: 2/13/2025

This Section 401 Water Quality Certification (WQC) request form must be submitted as part of a WQC request and identifies information needed for review. Please see Department of Ecology's (Ecology) [webpage](#)¹ for more information about the WQC request process and additional information regarding the request requirements.

Submit this WQC Request form along with the supporting information² to ecyrefedpermits@ecy.wa.gov.

Request packages should be sent in by email, mail submissions will not be accepted. Supporting information should not be consolidated into one large file, if your documents are consolidated into one file, please separate them before submitting.

Per the 2023 EPA Water Quality Certification rule, the certifying authority may identify the contents of a request for certification relevant to water quality related impacts from the activity. Items listed in Section D are always required for a complete application. If notified by Ecology prior to submittal of this request, items listed in Section E are also required. If this information has been provided to Ecology as part of your federal permit application, you do not need to submit them again. However, please indicate in Section D how they were provided. Ecology will provide acknowledgement of receipt of a complete WQC request to the project proponent. Once Ecology confirms we have received all the required information, our review time will begin.

A. Project Information

Project Name: Snohomish County Airport Westside Aerospace Complex

Ecology Aquatics ID Number: 143467

Project Location (Please attach a project location map when submitting this form): West side of Snohomish County Airport, see Attachment 1.

Project Address: No address

County: Snohomish County

B. Federal Permit or License Reference Number, if known: ___ NWS-2024-940-WRD _

Federal Agency: ☒ U.S. Army Corps of Engineers (Corps) ☐ U.S. Coast Guard
☐ Federal Energy Regulatory Commission ☐ Environmental Protection Agency (EPA)
☒ Other: Federal Aviation Administration

Identify the U.S. Army Corps permit, if applicable: ☐ Nationwide Permit ☒ Individual ☐ Other: _____

¹ <https://ecology.wa.gov/Regulations-Permits/Permits-certifications/401-Water-quality-certification>

² To submit documents over 25MB, e-mail ecyrefedpermits@ecy.wa.gov to request a secure link. Ecology does not accept outside links. Please include the Aquatics ID and project name when requesting a link.

To request an ADA accommodation, contact Ecology by phone at (360) 407-6076 or email at ecyrefedpermits@ecy.wa.gov, or visit <https://ecology.wa.gov/accessibility>.

For Relay Service or TTY call 711 or 877-833-6341.

Si necesita este formulario en español, por favor, llámenos a (360) 407-6076
o envíenos un correo electrónico a: ecyrefedpermits@ecy.wa.gov

If Nationwide Permit which one(s)? NWP(s) # _____

C. Was a Pre-Filing Meeting Request submitted to Ecology prior to submitting this WQC request?

☒ Yes, a pre-filing meeting request was submitted on date: 11/12/2024

D. Required for all projects requesting an individual WQC. Please check the boxes below indicating where the following documents can be found within this WQC request.

	Within WQC request	Within federal permit application	Previously submitted to Ecology and is still up to date	Notes to find information within the submission
Copy of the federal permit application package for the federal permit or license	<input type="checkbox"/>		Submitted 11/12/2024	
Complete up to date JARPA or other accepted application form	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/> Date: 11/12/2024	
Status of State Environmental Policy Act (SEPA) determination and/or exemption	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Date:	Pending SEPA submittal and approval
Project location map and drawings	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/> Date: 11/12/2024	
Best management practices (BMPs)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Date:	
Construction methodologies	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Date:	
Requirements for In-Water Work				
Water quality monitoring plan	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Date:	
Aquatic resource avoidance and minimization identified (e.g. eelgrass)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/> Date: 11/12/2024	See BA report Not included
Riparian revegetation, restoration, and management measures	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/> Date: 11/12/2024	See on-site restoration plan
Requirements for Work in Wetlands				
Wetland delineation report with data sheets	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/> Date: 11/12/2024	Not included
Wetland ratings	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/> Date: 11/12/2024	Attached to delineation report
Wetland mitigation plan, including avoidance and minimization measures, for wetland, stream, and/or other aquatic resources	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/> Date: 11/12/2024	See applicable JARPA, BA and Bank Use Plan sections Not included
Riparian planting and monitoring and measures	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/> Date: 11/12/2024	Not included

E. Required by project type or when identified by Ecology. Please check the boxes below indicating where the following documents can be found within this WQC request.

	Within WQC request	Within federal permit application	Previously submitted to Ecology and is still up to date	Notes to find information within the submission
Mitigation				
Wetland mitigation bank use plan	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/> Date: 11/12/2024	
In-lieu (ILF) use plan	<div>Not included</div> <input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Date:	
Water Quality Monitoring				
Water quality monitoring and protection plan	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Date:	
Spill prevention control and countermeasures plan	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Date:	
Upland Work				
Erosion and sediment control plan	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Date:	
Stormwater pollution prevention plan	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Date:	
De-Watering				
Flow diversion, cofferdam, and dewatering system plan	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Date:	
Stream bypass plan	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Date:	
Water dispersion/ infiltration plan	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Date:	
Culverts and Bridges				
Bridge demolition and construction plan	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Date:	
Culvert removal and replacement plan	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Date:	
Dredging				
Dredging and excavation plans	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Date:	
Suitability determination	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Date:	
Soils testing and characterization reports	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Date:	
Other				
Stone column installation plan	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Date:	
Horizontal direction drill (HDD) inadvertent return plan	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Date:	
Levee repair and bank stabilization plan	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Date:	
Piling removal and installation plan	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Date:	
Wastewater servicing for marina operations	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Date:	

Aquatic invasive species management plan	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Date:	
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F. Project Proponent Information

Project Proponent

First/Last Name: Rardin/Andrew

Organization: Snohomish County Airport

Phone #: 425-388-5115

E-mail: Andrew.Rardin@co.snohomish.wa.us

Agent/Consultant

First/Last Name: Hugh/Mortensen

Organization: Facet

Phone #: 425-650-1306

E-mail: hmortensen@facetnw.com

G. Required Certification Statements:

The project proponent hereby certifies that all information contained herein is true, accurate, and complete, to the best of my knowledge and belief.

The project proponent hereby requests that the certifying authority review and take action on this WQC request within the applicable reasonable period of time.

Signature:  Date: 02/06/2025

Print Name: Hugh Mortensen



WASHINGTON STATE

Joint Aquatic Resources Permit Application (JARPA) Form^{1,2} [\[help\]](#)

USE BLACK OR BLUE INK TO ENTER ANSWERS IN THE WHITE SPACES BELOW.



US Army Corps
of Engineers®
Seattle District

AGENCY USE ONLY

Date received: **11/12/2024 edoc**
INFO ONLY - Rec'd w/ PFMR

Agency reference #: _____

Tax Parcel #(s): _____

Part 1—Project Identification

1. Project Name (A name for your project that you create. Examples: Smith's Dock or Seabrook Lane Development) [\[help\]](#)

Westside Aerospace Complex

Part 2—Applicant

The person and/or organization responsible for the project. [\[help\]](#)

2a. Name (Last, First, Middle)

Andrew Rardin

2b. Organization (If applicable)

Snohomish County Airport

2c. Mailing Address (Street or PO Box)

9901 24th PL W, Suite A

2d. City, State, Zip

Everett, WA 98204

2e. Phone (1)

(425) 388-5115

2f. Phone (2)

2g. Fax

2h. E-mail

andrew.rardin@snoco.org

¹Additional forms may be required for the following permits:

- If your project may qualify for Department of the Army authorization through a Regional General Permit (RGP), contact the U.S. Army Corps of Engineers for application information (206) 764-3495.
- Not all cities and counties accept the JARPA for their local Shoreline permits. If you need a Shoreline permit, contact the appropriate city or county government to make sure they accept the JARPA.

²To access an online JARPA form with [\[help\]](#) screens, go to https://www.oria.wa.gov/site/alias_oria/4220/jarpa-form.aspx.

For other help, contact the Governor's Office for Regulatory Innovation and Assistance at (800) 917-0043 or help@oria.wa.gov.

Part 3—Authorized Agent or Contact

Person authorized to represent the applicant about the project. (Note: Authorized agent(s) must sign 11b of this application.) [\[help\]](#)

3a. Name (Last, First, Middle)			
Mortensen, Hugh			
3b. Organization (If applicable)			
Facet			
3c. Mailing Address (Street or PO Box)			
750 6th Street South			
3d. City, State, Zip			
Kirkland, WA 98033			
3e. Phone (1)	3f. Phone (2)	3g. Fax	3h. E-mail
(425) 650-1306			hmortensen@facetnw.com

Part 4—Property Owner(s)

Contact information for people or organizations owning the property(ies) where the project will occur. Consider both **upland and aquatic** ownership because the upland owners may not own the adjacent aquatic land. [\[help\]](#)

- ☒ Same as applicant. (Skip to Part 5.)
- ☐ Repair or maintenance activities on existing rights-of-way or easements. (Skip to Part 5.)
- ☐ There are multiple upland property owners. Complete the section below and fill out [JARPA Attachment A](#) for each additional property owner.
- ☐ Your project is on Department of Natural Resources (DNR)-managed aquatic lands. If you don't know, contact the DNR at (360) 902-1100 to determine aquatic land ownership. If yes, complete [JARPA Attachment E](#) to apply for the Aquatic Use Authorization.

4a. Name (Last, First, Middle)			
4b. Organization (If applicable)			
4c. Mailing Address (Street or PO Box)			
4d. City, State, Zip			
4e. Phone (1)	4f. Phone (2)	4g. Fax	4h. E-mail

Part 5–Project Location(s)

Identifying information about the property or properties where the project will occur. [\[help\]](#)

- ☐ There are multiple project locations (e.g. linear projects). Complete the section below and use [JARPA Attachment B](#) for each additional project location.

5a. Indicate the type of ownership of the property. (Check all that apply.) [help]			
<input type="checkbox"/> Private			
<input type="checkbox"/> Federal			
<input checked="" type="checkbox"/> Publicly owned (state, county, city, special districts like schools, ports, etc.)			
<input type="checkbox"/> Tribal			
<input type="checkbox"/> Department of Natural Resources (DNR) – managed aquatic lands (Complete JARPA Attachment E)			
5b. Street Address (Cannot be a PO Box. If there is no address, provide other location information in 5p.) [help]			
The project area is located between Paine Field Blvd and West Perimeter Rd			
5c. City, State, Zip (If the project is not in a city or town, provide the name of the nearest city or town.) [help]			
Everett, WA 98204			
5d. County [help]			
Snohomish County			
5e. Provide the section, township, and range for the project location. [help]			
¼ Section	Section	Township	Range
SW	15	28 N	04 E
5f. Provide the latitude and longitude of the project location. [help]			
<ul style="list-style-type: none">Example: 47.03922 N lat. / -122.89142 W long. (Use decimal degrees - NAD 83)			
47.91488 N lat., -122.290077 W long.			
5g. List the tax parcel number(s) for the project location. [help]			
<ul style="list-style-type: none">The local county assessor's office can provide this information.			
28041500203000, 28041500203300, 28041500203400, 28041500204700, 28041500203500, 28041500204600, 28041500203600, 28041500204500, 28041500203700, 28041500301200, 28041500301900, 28041500203400, 28041500301300, 28041500301800, 28041500301400			
5h. Contact information for all adjoining property owners. (If you need more space, use JARPA Attachment C.) [help]			
Name	Mailing Address		Tax Parcel # (if known)
N/A – All surrounding properties are owned by Snohomish County			

5i. List all wetlands on or adjacent to the project location. [\[help\]](#)

For additional details, please see the attached Stream & Wetland Delineation prepared by The Watershed Company (now Facet), May 2022, and the Wetland Delineation Addendum, May 2024. There are several small wetlands outside of the project location to the south that were not included in the project study area.

Feature Name	Category/Type	Habitat Score	Standard Buffer (ft)*	Size (ft ²)
Wetland 1	Category IV	5	40	9,817
Wetland 2	Category IV	4	40	2,726
Wetland 3	Category IV	4	40	756
Wetland 3A	Category IV	5	40	15,052
Wetland 4	Category III	5	110	35,101
Wetland 5	Category IV	4	40	3,044
Wetland 6	Category III	6	110	37,602
Wetland 7A	Category III	5	110	804
Wetland 7B	Category II	6	110	56,960
Wetland 7C	Category IV	5	40	67
Wetland 12**	Category III	4	60	11,314
Wetland 48	Category III	6	110	11,792
Wetland 49	Category IV	6	40	11,515
Wetland 50	Category III	6	110	3,558
Wetland 101	Category IV	3	40	1,338
Wetland 401**	Category IV	5	40	4,267
Wetland 402**	Category V	5	40	466

* *Per Snohomish County Critical Areas Code.*

** *Denotes changes or additions outlined in the 2024 wetland delineation addendum.*

5j. List all waterbodies (other than wetlands) on or adjacent to the project location. [\[help\]](#)

For additional details, please see the attached Stream & Wetland Delineation prepared by The Watershed Company (Now Facet), May 2022, the Wetland Delineation Addendum, May 2024, and the Biological Assessment, September 2024.

Feature Name	Category/Type	Standard Buffer (ft)	Location
Stream A	F	150	South of project area on site; Headwater tributary to Big Gulch Creek.
Stream B	Ns	50	Small tributary to Stream A; outside of project area and receives no runoff from the project.

5k. Is any part of the project area within a 100-year floodplain? [\[help\]](#)

☐ Yes ☒ No ☐ Don't know

5l. Briefly describe the vegetation and habitat conditions on the property. [\[help\]](#)

The subject property is approximately 70 acres in size and is currently undeveloped. The site topography is varied, with hills, ravines, and slopes in the southern portion and more gentle slopes in the north. Habitat conditions include cleared and maintained areas that are vegetated primarily with grasses and other herbaceous plants, scrub-shrub areas that are densely vegetated, and some forested areas that are vegetated with a robust native plant community with others that have an invasive weed understory. Much of the project area is dominated by grasses and herbaceous weeds. These areas extend along the northern edge and into the center of the project area and appear to be mowed fairly consistently. The eastern half of the area is managed to control vegetation height for Federal Aviation Administration airspace penetration compliance.

5m. Describe how the property is currently used. [\[help\]](#)

The project area is currently undeveloped except for gravel roads. Existing facilities at SCA, outside of the project area, support commercial and general aviation activities, including manufacturing, transportation, cargo and small and large, wide-body jet aircraft usage.

5n. Describe how the adjacent properties are currently used. [\[help\]](#)

The surrounding land use is dominated by primarily high-intensity residential to the west and the active airport to the east and north. The properties located to the south are undeveloped properties owned by the airport.

5o. Describe the structures (above and below ground) on the property, including their purpose(s) and current condition. [\[help\]](#)

There are no structures in the project area.

5p. Provide driving directions from the closest highway to the project location, and attach a map. [\[help\]](#)

Begin on Interstate 405, continuing on when it merges into State Route 525 (Mukilteo Speedway). Turn right onto Paine Field Blvd, continuing for approximately ½ mile. The 14 parcels comprising the project area are located to the west of Paine Field Blvd before Dreamlifter Drive.

The project area is within a restricted access area. Entry can be arranged by a security escort, as necessary.

Part 6—Project Description

6a. Briefly summarize the overall project. You can provide more detail in 6b. [\[help\]](#)

SCA and Capstone Partners have proposed the Westside Aerospace Complex Project to provide wide-body cargo and/or manufacturing space with direct access to the runway for aerospace clients seeking to ship cargo, manufacture, repair, maintain, store, and transport aviation-related products, including wide-body commercial aircraft and aircraft components, essential to the continued operation of existing aviation facilities at Paine Field. The proposal includes the construction of a main facility building, security building, and maintenance specifically related to uses dependent on large, commercial aviation runway access. In addition to the structures, the proposal includes large and medium airplane berths, airplane movement and maneuvering areas/ramps, new/reconfigured airplane taxi lanes from the existing runway, truck loading berths, and van/box truck loading docks. The facility will result in approximately 32 acres of new impervious surface area. An engineered stormwater facility will be constructed in compliance with the most current version of the Snohomish County Stormwater Manual. Fifteen wetlands and two streams have been delineated on-site by The Watershed Company (now Facet). The construction of the proposed facility will have direct and indirect impacts on several of the delineated wetlands. A mitigation plan has been prepared to include off-site mitigation by purchasing credits from the Paine Field Wetland Compensation Bank.

6b. Describe the purpose of the project and why you want or need to perform it. [\[help\]](#)

The demand for cargo and the potential additional manufacturing, repair, maintenance, storage, and transportation space has resulted in the need for new facilities at the airport. To provide sufficiently sized aircraft for cargo or to ensure compatibility with existing manufacturing processes, the new facilities must have direct access to the runway, taxiways, perimeter roads, and other public and private Paine Field facilities. Runway and taxi-lane proximity is essential to the proposed site for both uses. Wide-body cargo airplanes or aerospace products will be utilized in manufacturing, and exported products will leave the facility upon completion. Additionally, these aircraft considered are too large to be moved on roads or rail lines. Transport within the existing runway and taxi-lane access system is the only practicable means by which either of these functions can successfully be executed. The proposed concept design includes an airplane parking apron area, a freight cargo processing facility, a maintenance building, a freight truck loading and unloading area, and an employee parking lot. A taxi lane will connect the existing FedEx facility ramp apron area to the Project area. A parallel taxiway is proposed alongside the Project area in the FAA Approved Airport Master Plan (August 2024). The Project also provides a concept for the stormwater management of runoff from the development area and the parallel taxiway.

6c. Indicate the project category. (Check all that apply) [\[help\]](#)

- | | | | | |
|--|--|--|---|---------------------------------------|
| <input checked="" type="checkbox"/> Commercial | <input type="checkbox"/> Residential | <input type="checkbox"/> Institutional | <input type="checkbox"/> Transportation | <input type="checkbox"/> Recreational |
| <input type="checkbox"/> Maintenance | <input type="checkbox"/> Environmental Enhancement | | | |

6d. Indicate the major elements of your project. (Check all that apply) [\[help\]](#)

- | | | | |
|---|---|--|---|
| <input type="checkbox"/> Aquaculture | <input checked="" type="checkbox"/> Culvert | <input type="checkbox"/> Float | <input checked="" type="checkbox"/> Retaining Wall (upland) |
| <input type="checkbox"/> Bank Stabilization | <input type="checkbox"/> Dam / Weir | <input type="checkbox"/> Floating Home | <input checked="" type="checkbox"/> Road |
| <input type="checkbox"/> Boat House | <input type="checkbox"/> Dike / Levee / Jetty | <input type="checkbox"/> Geotechnical Survey | <input type="checkbox"/> Scientific Measurement Device |
| <input type="checkbox"/> Boat Launch | <input checked="" type="checkbox"/> Ditch | <input type="checkbox"/> Land Clearing | <input type="checkbox"/> Stairs |
| <input type="checkbox"/> Boat Lift | <input type="checkbox"/> Dock / Pier | <input type="checkbox"/> Marina / Moorage | <input checked="" type="checkbox"/> Stormwater facility |
| <input type="checkbox"/> Bridge | <input type="checkbox"/> Dredging | <input type="checkbox"/> Mining | <input type="checkbox"/> Swimming Pool |
| <input type="checkbox"/> Bulkhead | <input checked="" type="checkbox"/> Fence | <input type="checkbox"/> Outfall Structure | <input checked="" type="checkbox"/> Utility Line |
| <input type="checkbox"/> Buoy | <input type="checkbox"/> Ferry Terminal | <input type="checkbox"/> Piling/Dolphin | |
| <input type="checkbox"/> Channel Modification | <input type="checkbox"/> Fishway | <input type="checkbox"/> Raft | |

☒ Other: Aviation support facility

6e. Describe how you plan to construct each project element checked in 6d. Include specific construction methods and equipment to be used. [\[help\]](#)

- Identify where each element will occur in relation to the nearest waterbody.
- Indicate which activities are within the 100-year floodplain.

The site is expected to be developed over two consecutive construction seasons. Site grading, utilities, and paving in preparation for building construction will be completed during the first season. Construction on the buildings will begin in the first season and conclude at the end of the second season. Each construction season is assumed to be June through October in consecutive years.

Construction will begin with clearing and grubbing of the site, and preparation of a staging area for equipment and materials. General site grading will follow using scrapers, excavators, and dozers. Excess material will be removed from the project area and stockpiled, either offsite in an approved facility or on the airport site for use on future projects. Utility installation will follow grading and will be completed to points outside of paved areas and stubbed into building foundations. Upon completion of utility installation, construction of building foundations will commence using excavators, dozers, concrete trucks/pumps, and hand tools. Upon completion of foundations, building construction can begin using forklifts, cranes, and labor. Paving of the parking lot, access road, and pavement immediately surrounding the building sites will be completed in the first season. Building construction will progress inside the outer shell through the winter.

Season 2 will begin when the weather allows paving operations. The aircraft apron will be constructed first, followed by the connections to the existing airport facilities. Final site activities will include seeding/mulching, pavement markings, and signage. Final building activities will include facility commissioning, tenant acceptance, and building occupancy permitting.

The project will impact Wetlands 1, 2, 3, 3A, 4, 5, 6, 7A, 12, 101, 401, and 402 and Stream A and their associated buffers through the construction of the proposed structure and related infrastructure. See attached site plans for information specific to each waterbody. There are no mapped 100-year floodplains within the project area.

6f. What are the anticipated start and end dates for project construction? (Month/Year) [help] <ul style="list-style-type: none"> If the project will be constructed in phases or stages, use JARPA Attachment D to list the start and end dates of each phase or stage.
Start Date: <u>Summer 2026</u> End Date: <u>Summer 2028</u> <input type="checkbox"/> See JARPA Attachment D
6g. Fair market value of the project, including materials, labor, machine rentals, etc. [help]
\$ 100,000,000.00
6h. Will any portion of the project receive federal funding? [help] <ul style="list-style-type: none"> If yes, list each agency providing funds.
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Don't know

Part 7–Wetlands: Impacts and Mitigation

- ☒ Check here if there are wetlands or wetland buffers on or adjacent to the project area.
(If there are none, skip to Part 8.) [\[help\]](#)

7a. Describe how the project has been designed to avoid and minimize adverse impacts to wetlands. [help]
<input type="checkbox"/> Not applicable
<p>The project is limited to available locations given the required proximity to the existing airport, associated runway, and common-use taxi lane. Much of the project site is encumbered by wetlands, streams, and their associated buffers. As such, complete avoidance is not possible and would prevent the development entirely. To avoid critical areas and associated buffers to the greatest extent feasible, components of the project have been strategically designed and reconfigured to arrive at the current proposal. The project proposal has been limited to the northern portion of the project area to minimize and avoid impacts to higher-quality wetland habitats and streams. However, due to FAA safety and regulatory reasons, perpetual site protection of avoided wetland areas south of the project area is not proposed by the project.</p> <p>As proposed, the development will require approximately 119,680 SF (2.7 acres) of permanent wetland impacts. Temporary impacts will be restored in place following project construction. To compensate for the impacts that cannot be mitigated on-site, additional mitigation credits will be purchased through the Paine Field Wetland Compensation Bank. See the attached Mitigation Bank Use Plan (Facet, October 2024).</p>
<div style="border: 1px solid red; padding: 2px; color: green; font-weight: bold;">Not included</div>
7b. Will the project impact wetlands? [help]
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Don't know
7c. Will the project impact wetland buffers? [help]
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Don't know
7d. Has a wetland delineation report been prepared? [help] <ul style="list-style-type: none"> If Yes, submit the report, including data sheets, with the JARPA package.
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
7e. Have the wetlands been rated using the Western Washington or Eastern Washington Wetland Rating System? [help] <ul style="list-style-type: none"> If Yes, submit the wetland rating forms and figures with the JARPA package.
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Don't know

7f. Have you prepared a mitigation plan to compensate for any adverse impacts to wetlands? [\[help\]](#)

- If **Yes**, submit the plan with the JARPA package and answer 7g.
- If **No, or Not applicable**, explain below why a mitigation plan should not be required.

☒ Yes ☐ No ☐ Don't know

Yes, a compensatory wetland bank use plan has been prepared that is included with the application materials. Mitigation banking is the preferred method of off-site mitigation according to the Army Corps of Engineers (ACOE) and the Department of Ecology. As such, the proposed wetland impacts will be mitigated by purchasing credits from the Paine Field Wetland Compensation Bank.

Mitigation is not allowed in a different WRIA

7g. Summarize what the mitigation plan is meant to accomplish and describe how a watershed approach was used to design the plan. [\[help\]](#)

Wetland and buffer impacts will be mitigated through the transfer of wetland and buffer mitigation credits from the state and federally-approved Narbeck and Swanson Wetland Mitigation Banks. These mitigation banks are reserved for the exclusive use of SCA specifically for aviation-related impacts to wetlands and buffers located on SCA property and associated with the development, expansion, and safety of SCA. The mitigation banks are intended to replace wetland and buffer functions within the same watershed in which the project is located. The mitigation banks had a diverse set of goals and performance standards related to habitat establishment, water quality, and hydrologic functions in addition to public education benefits. The banks were intensively monitored over a period of at least ten years and all performance standards were documented and approved as being achieved in 1999. Regular annual monitoring of both banks is ongoing to ensure the areas remain highly-functioning wetland systems. A mitigation bank use plan has been prepared that demonstrates how the project complies with the appropriate process for the use of the mitigation bank instrument. See attached Westside Aerospace Complex Bank Use Plan (Facet, 2024). Preparation of the bank use plan is based on the interagency guidance: *Using Credits from Wetland Mitigation Banks: Guidance to Applicants on Submittal Contents for Bank Use Plans* (Corps 2012). The on-site restoration plan seeks to restore a native plant assemblage to a small area of wetland buffer that will be cleared during the construction of the project.

7h. Use the table below to list the type and rating of each wetland impacted, the extent and duration of the impact, and the type and amount of mitigation proposed. Or if you are submitting a mitigation plan with a similar table, you can state (below) where we can find this information in the plan. [\[help\]](#)

Activity (fill, drain, excavate, flood, etc.)	Wetland Name ¹	Wetland type and rating category ²	Impact area (sq. ft.)	Duration of impact ³	Proposed mitigation type ⁴	Wetland mitigation area (sq. ft. or acres) *
Fill	Wetland 1	Category IV	9,818	Permanent	B	
Fill	Wetland 2	Category IV	2,726	Permanent	B	
Excavate	Wetland 3	Category IV	756	Permanent	B	
Excavate	Wetland 3A	Category IV	15,052	Permanent	B	
Excavate	Wetland 4	Category III	35,101	Permanent	B	
Fill	Wetland 5	Category IV	3,044	Permanent	B	
Fill	Wetland 6	Category III	37,602	Permanent	B	
Fill	Wetland 7A	Category III	534	Permanent	B	
Fill	Wetland 12	Category III	11,314	Permanent	B	
Excavate	Wetland 101	Category IV	1,338	Permanent	B	
Excavate	Wetland 401	Category IV	4,267	Permanent	B	
Fill	Wetland 402	Category IV	456	Permanent	B	

¹ If no official name for the wetland exists, create a unique name (such as "Wetland 1"). The name should be consistent with other project documents, such as a wetland delineation report.

² Ecology wetland category based on current Western Washington or Eastern Washington Wetland Rating System. Provide the wetland rating forms with the JARPA package.

³ Indicate the days, months or years the wetland will be measurably impacted by the activity. Enter "permanent" if applicable.

⁴ Creation (C), Re-establishment/Rehabilitation (R), Enhancement (E), Preservation (P), Mitigation Bank/In-lieu fee (B)

* See the Westside Aerospace Complex Bank Use Plan developed by Facet (2024) included with this application.

Page number(s) for similar information in the mitigation plan, if available: _____

7i. For all filling activities identified in 7h, describe the source and nature of the fill material, the amount in cubic yards that will be used, and how and where it will be placed into the wetland. [\[help\]](#)

Approximately 42,341 cubic yards of clean structural fill will be placed within the delineated wetland boundaries referenced above to construct the proposed warehouse building and associated required parking stalls. Fill soils will either be suitable native material from the project site or a permitted borrow pit. If sourced, fill soils will be selected such that they are clean.

Wetland Name	Amount of material (cubic yards)
Wetland 1	1,759
Wetland 2	761
Wetland 5	1,984
Wetland 6	35,087
Wetland 7A	20
Wetland 12	2,582
Wetland 402	148

7j. For all excavating activities identified in 7h, describe the excavation method, type and amount of material in cubic yards you will remove, and where the material will be disposed. [\[help\]](#)

To construct the proposed airfield support facility, approximately 23,706 cubic yards of fill will be excavated within the delineated wetland boundaries referenced above. This will be completed using bulldozers and excavators to move the earth materials to the project area that needs fill. Excess soil suitable to be used as fill will be hauled to a stockpile site within the airport property. Material unsuitable for use as fill will be disposed of offsite.

Wetland Name	Amount of material (cubic yards)
Wetland 3	615
Wetland 3A	11,725
Wetland 4	8,797
Wetland 101	459
Wetland 401	2,110

Part 8—Waterbodies (other than wetlands): Impacts and Mitigation

In Part 8, “waterbodies” refers to non-wetland waterbodies. (See Part 7 for information related to wetlands.) [\[help\]](#)

☒ Check here if there are waterbodies on or adjacent to the project area. (If there are none, skip to Part 9.)

8a. Describe how the project is designed to avoid and minimize adverse impacts to the aquatic environment. [\[help\]](#)

☐ Not applicable

As noted above, much of the project site is encumbered by wetlands, streams, and their associated buffers. As such, complete avoidance is not possible and would prevent the development entirely. To avoid critical areas and associated buffers to the greatest extent feasible, components of the project have been strategically designed and reconfigured to arrive at the current proposal. The project proposal has been limited to the northern portion of the project area to minimize and avoid impacts to higher-quality wetland habitats and streams. However, due to FAA safety and regulatory reasons, perpetual site protection of avoided wetland areas south of the project area is not proposed by the project.

As proposed, the development will require approximately 40 linear feet of Stream A within Wetland 7a will be permanently impacted due to project grading. To compensate for the impacts that cannot be mitigated on-site, additional mitigation credits will be purchased through the Paine Field Wetland Compensation Bank. See the attached Westside Aerospace Complex Bank Use Plan (Facet, 2024).

8b. Will your project impact a waterbody or the area around a waterbody? [\[help\]](#)

☒ Yes ☐ No

8c. Have you prepared a mitigation plan to compensate for the project’s adverse impacts to non-wetland waterbodies? [\[help\]](#)

- If Yes, submit the plan with the JARPA package and answer 8d.
- If No, or Not applicable, explain below why a mitigation plan should not be required.

☒ Yes ☐ No ☐ Don’t know

Yes, please see the Westside Aerospace Complex Bank Use Plan prepared by Facet included with the application materials. Not included

8d. Summarize what the mitigation plan is meant to accomplish. Describe how a watershed approach was used to design the plan.

- If you already completed 7g you do not need to restate your answer here. [\[help\]](#)

See response to 7g above.

8e. Summarize impact(s) to each waterbody in the table below. [\[help\]](#)

Activity (clear, dredge, fill, pile drive, etc.)	Waterbody name ¹	Impact location ²	Duration of impact ³	Amount of material (cubic yards) to be placed in or removed from waterbody	Area (sq. ft. or linear ft.) of waterbody directly affected
Fill	Stream A	In the waterbody	Permanent		40 linear feet

¹ If no official name for the waterbody exists, create a unique name (such as “Stream 1”) The name should be consistent with other documents provided.

² Indicate whether the impact will occur in or adjacent to the waterbody. If adjacent, provide the distance between the impact and the waterbody and indicate whether the impact will occur within the 100-year flood plain.

³ Indicate the days, months or years the waterbody will be measurably impacted by the work. Enter “permanent” if applicable.

8f. For all activities identified in 8e, describe the source and nature of the fill material, amount (in cubic yards) you will use, and how and where it will be placed into the waterbody. [\[help\]](#)

Structural fill will be placed in approximately 40 linear feet of the Stream A to construct the proposed warehouse building and associated required parking stalls. Fill soils will either be suitable, clean native material from the project site or a permitted borrow pit. If sourced, fill soils will be selected such that they are clean.

8g. For all excavating or dredging activities identified in 8e, describe the method for excavating or dredging, type and amount of material you will remove, and where the material will be disposed. [\[help\]](#)

N/A

8h. Have you prepared a Water Quality Monitoring Plan (WQMP) for all in-water work (below ordinary high water), over water work or discharges to waters of the state?

☐ Yes ☒ No

If NO describe the monitoring that you will be conducting including parameters, equipment and locations, or explain why monitoring will not be necessary. [\[help\]](#)

Information forthcoming.

Part 9–Additional Information

Any additional information you can provide helps the reviewer(s) understand your project. Complete as much of this section as you can. It is ok if you cannot answer a question.

9a. If you have already worked with any government agencies on this project, list them below. [\[help\]](#)

Agency Name	Contact Name	Phone	Most Recent Date of Contact
Department of Ecology	Douglas Gresham	(425) 429-1846	March 2024
Army Corps of Engineers	Jacalen Printz	(206) 764-6901	March 2024
Army Corps of Engineers	Ryan Cochoit	(206) 601-2691	March 2024
Army Corps of Engineers	Megan Mae Ancheta	(206) 316-3094	March 2024

9b. Are any of the wetlands or waterbodies identified in Part 7 or Part 8 of this JARPA on the Washington Department of Ecology's 303(d) List? [\[help\]](#)

- If Yes, list the parameter(s) below.
- If you don't know, use Washington Department of Ecology's Water Quality Assessment tools at: <https://ecology.wa.gov/Water-Shorelines/Water-quality/Water-improvement/Assessment-of-state-waters-303d>.

☐ Yes ☒ No

<p>9c. What U.S. Geological Survey Hydrological Unit Code (HUC) is the project in? [help]</p> <ul style="list-style-type: none"> Go to http://cfpub.epa.gov/surf/locate/index.cfm to help identify the HUC.
171100190202
<p>9d. What Water Resource Inventory Area Number (WRIA #) is the project in? [help]</p> <ul style="list-style-type: none"> Go to https://ecology.wa.gov/Water-Shorelines/Water-supply/Water-availability/Watershed-look-up to find the WRIA #.
<p>WRIA 7 – Snohomish Watershed Wrong! The project is in WRIA 8</p>
<p>9e. Will the in-water construction work comply with the State of Washington water quality standards for turbidity? [help]</p> <ul style="list-style-type: none"> Go to https://ecology.wa.gov/Water-Shorelines/Water-quality/Freshwater/Surface-water-quality-standards/Criteria for the standards.
<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not applicable</p>
<p>9f. If the project is within the jurisdiction of the Shoreline Management Act, what is the local shoreline environment designation? [help]</p> <ul style="list-style-type: none"> If you don't know, contact the local planning department. For more information, go to: https://ecology.wa.gov/Water-Shorelines/Shoreline-coastal-management/Shoreline-coastal-planning/Shoreline-laws-rules-and-cases.
<p><input type="checkbox"/> Urban <input type="checkbox"/> Natural <input type="checkbox"/> Aquatic <input type="checkbox"/> Conservancy <input checked="" type="checkbox"/> Other: <u>N/A</u></p>
<p>9g. What is the Washington Department of Natural Resources Water Type? [help]</p> <ul style="list-style-type: none"> Go to http://www.dnr.wa.gov/forest-practices-water-typing for the Forest Practices Water Typing System.
<p><input type="checkbox"/> Shoreline <input type="checkbox"/> Fish <input type="checkbox"/> Non-Fish Perennial <input checked="" type="checkbox"/> Non-Fish Seasonal</p>
<p>9h. Will this project be designed to meet the Washington Department of Ecology's most current stormwater manual? [help]</p> <ul style="list-style-type: none"> If No, provide the name of the manual your project is designed to meet.
<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Wrong Manual, SNOCO 2021 Drainage Manual is the current manual.</p>
<p>Name of manual: <u>2024 Stormwater Management Manual for Western Washington (SWMMWW)</u></p>
<p>9i. Does the project site have known contaminated sediment? [help]</p> <ul style="list-style-type: none"> If Yes, please describe below.
<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>
<p>9j. If you know what the property was used for in the past, describe below. [help]</p>
N/A
<p>9k. Is the project located in or adjacent to a designated state or federal contaminated site or clean-up site. (e.g. MTCA or CERCLA)?</p> <ul style="list-style-type: none"> If Yes, provide any additional details below.
<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>
<p>9l. Has a cultural resource (archaeological) survey been performed on the project area? [help]</p> <ul style="list-style-type: none"> If Yes, attach it to your JARPA package.
<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>

9m. Name each species listed under the federal Endangered Species Act that occurs in the vicinity of the project area or might be affected by the proposed work. [\[help\]](#)

For detailed information, please see the attached Snohomish County Airport Westside Aerospace Complex Biological Assessment developed by Facet (2024).

9n. Name each species or habitat on the Washington Department of Fish and Wildlife's Priority Habitats and Species List that might be affected by the proposed work. [\[help\]](#)

For detailed information on many of the following species and habitats, please see the attached Snohomish County Airport Westside Aerospace Complex Biological Assessment developed by Facet (2024).

Priority species that may be directly or indirectly affected include: Pacific sand lance, bull trout, Chinook salmon, steelhead, coastal resident cutthroat trout, coho salmon

Threatened species.

Priority habitats that may be directly or indirectly affected include wetlands, instream, riparian, and Puget Sound nearshore.

Part 10–SEPA Compliance and Permits

Use the resources and checklist below to identify the permits you are applying for.

- Online Project Questionnaire at <http://apps.oria.wa.gov/opas/>.
- Governor's Office for Regulatory Innovation and Assistance at (800) 917-0043 or help@oria.wa.gov.
- For a list of addresses to send your JARPA to, click on [agency addresses for completed JARPA](#).

10a. Compliance with the State Environmental Policy Act (SEPA). (Check all that apply.) [\[help\]](#)

- For more information about SEPA, go to <https://ecology.wa.gov/regulations-permits/SEPA-environmental-review>.

☐ A copy of the SEPA determination or letter of exemption is included with this application.

☒ A SEPA determination is pending with Snohomish County (lead agency). The expected decision date is January 2026.

☐ I am applying for a Fish Habitat Enhancement Exemption. (Check the box below in 10b.) [\[help\]](#)

☐ This project is exempt (choose type of exemption below).

☐ Categorical Exemption. Under what section of the SEPA administrative code (WAC) is it exempt?

☐ Other: _____

☐ SEPA is pre-empted by federal law.

10b. Indicate the permits you are applying for. (Check all that apply.) [\[help\]](#)

LOCAL GOVERNMENT

Local Government Shoreline permits:

☐ Substantial Development ☐ Conditional Use ☐ Variance

☐ Shoreline Exemption Type (explain): _____

Other City/County permits:

☐ Floodplain Development Permit ☒ Critical Areas Ordinance

STATE GOVERNMENT

Washington Department of Fish and Wildlife:

☒ Hydraulic Project Approval (HPA) ☐ Fish Habitat Enhancement Exemption – [Attach Exemption Form](#)

Washington Department of Natural Resources:

☐ Aquatic Use Authorization

Complete [JARPA Attachment E](#) and submit a check for \$25 payable to the Washington Department of Natural Resources.

Do not send cash.

Washington Department of Ecology:

☒ Section 401 Water Quality Certification

☐ Authorization to impact waters of the state, including wetlands (Check this box if the proposed impacts are to waters not subject to the federal Clean Water Act)

FEDERAL AND TRIBAL GOVERNMENT

United States Department of the Army (U.S. Army Corps of Engineers):

☒ Section 404 (discharges into waters of the U.S.) ☐ Section 10 (work in navigable waters)

United States Coast Guard:

For projects or bridges over waters of the United States, contact the U.S. Coast Guard at:

☐ Bridge Permit: D13-SMB-D13-BRIDGES@uscg.mil

☐ Private Aids to Navigation (or other non-bridge permits): D13-SMB-D13-PATON@uscg.mil

United States Environmental Protection Agency:

☐ Section 401 Water Quality Certification (discharges into waters of the U.S.) on tribal lands where tribes do not have treatment as a state (TAS)

Tribal Permits: (Check with the tribe to see if there are other tribal permits, e.g., Tribal Environmental Protection Act, Shoreline Permits, Hydraulic Project Permits, or other in addition to CWA Section 401 WQC)

☐ Section 401 Water Quality Certification (discharges into waters of the U.S.) where the tribe has treatment as a state (TAS).

Part 11—Authorizing Signatures

Signatures are required before submitting the JARPA package. The JARPA package includes the JARPA form, project plans, photos, etc. [\[help\]](#)

11a. Applicant Signature (required) [\[help\]](#)

I certify that to the best of my knowledge and belief, the information provided in this application is true, complete, and accurate. I also certify that I have the authority to carry out the proposed activities, and I agree to start work only after I have received all necessary permits.

I hereby authorize the agent named in Part 3 of this application to act on my behalf in matters related to this application. Acr (initial)

By initialing here, I state that I have the authority to grant access to the property. I also give my consent to the permitting agencies entering the property where the project is located to inspect the project site or any work related to the project. ACR (initial)

Andrew Rardin	<u>Andrew Rardin</u>	12/11/24
Applicant Printed Name	Applicant Signature	Date

11b. Authorized Agent Signature [\[help\]](#)

I certify that to the best of my knowledge and belief, the information provided in this application is true, complete, and accurate. I also certify that I have the authority to carry out the proposed activities and I agree to start work only after all necessary permits have been issued.

Hugh Mortensen	<u>Hugh Mortensen</u>	11/11/24
Authorized Agent Printed Name	Authorized Agent Signature	Date

11c. Property Owner Signature (if not applicant) [\[help\]](#)

Not required if project is on existing rights-of-way or easements (provide copy of easement with JARPA).

I consent to the permitting agencies entering the property where the project is located to inspect the project site or any work. These inspections shall occur at reasonable times and, if practical, with prior notice to the landowner.

Andrew Rardin	<u>Andrew Rardin</u>	12/11/24
Property Owner Printed Name	Property Owner Signature	Date

18 U.S.C §1001 provides that: Whoever, in any manner within the jurisdiction of any department or agency of the United States knowingly falsifies, conceals, or covers up by any trick, scheme, or device a material fact or makes any false, fictitious, or fraudulent statements or representations or makes or uses any false writing or document knowing same to contain any false, fictitious, or fraudulent statement or entry, shall be fined not more than \$10,000 or imprisoned not more than 5 years or both.

If you require this document in another format, contact the Governor's Office for Regulatory Innovation and Assistance (ORIA) at (800) 917-0043. People with hearing loss can call 711 for Washington Relay Service. People with a speech disability can call (877) 833-6341. ORIA publication number: ORIA-16-011 rev. 09/2018









FINAL JARPA SCA WESTSIDE AEROSPACE COMPLEX

Final Audit Report

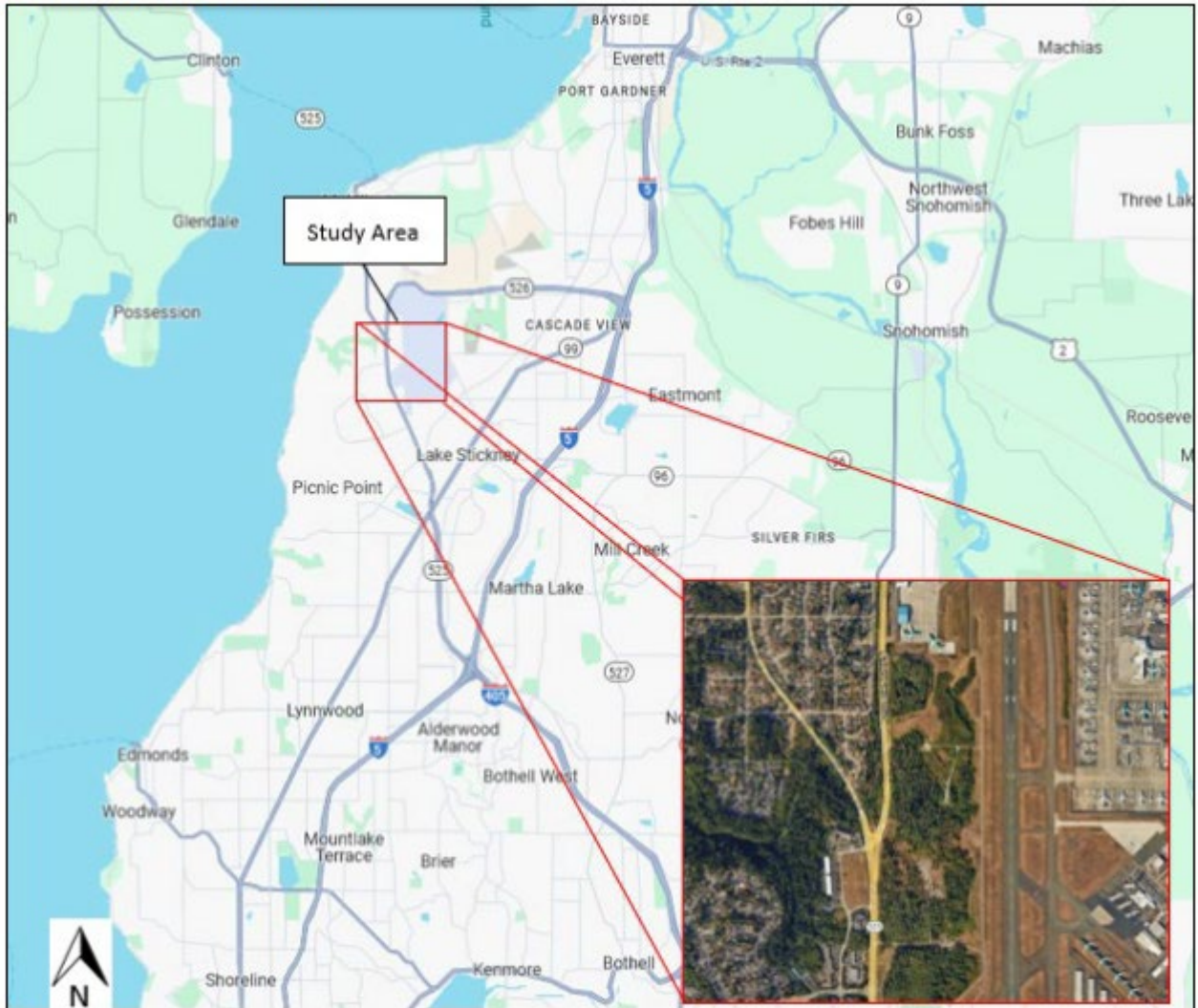
2024-11-12

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By:	Kim Frappier (kfrappier@watershedco.com)
Status:	Signed
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-  Document created by Kim Frappier (kfrappier@watershedco.com)
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-  Document emailed to Hugh Mortensen (hmortensen@facetnw.com) for signature
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-  Agreement completed.
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Attachment 1: Project Vicinity Map

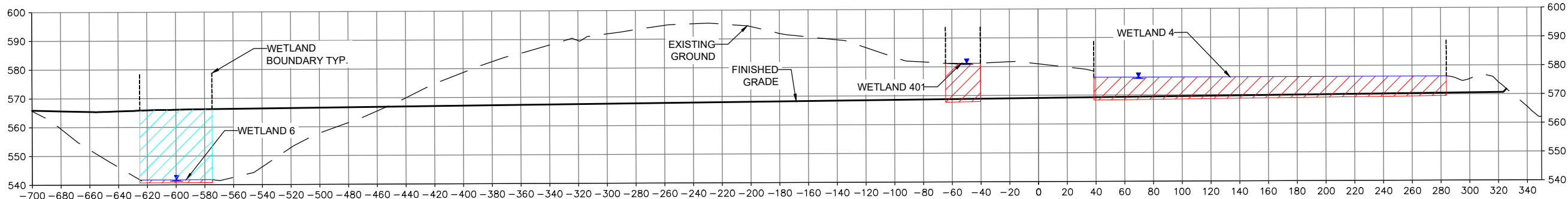


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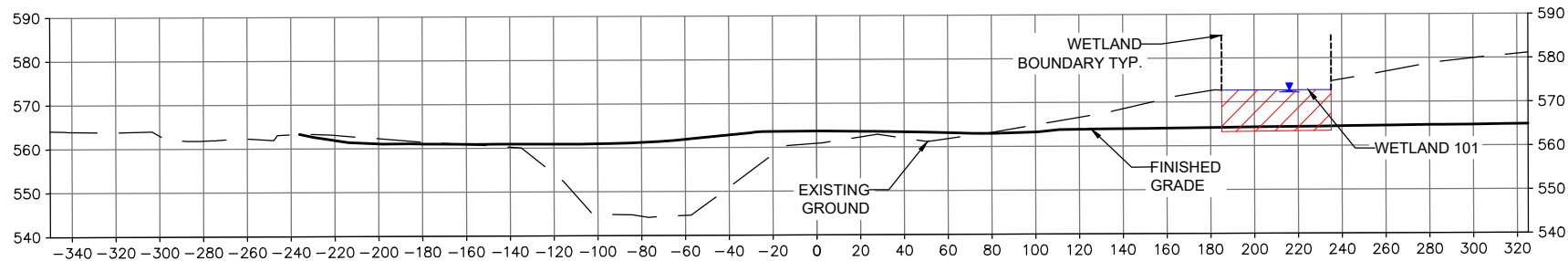
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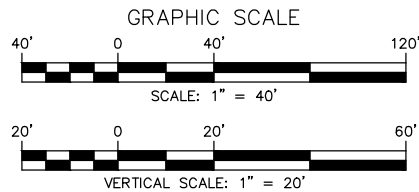
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1 WETLANDS 4, 401, & 6 SECTION VIEW



2 WETLAND 101 SECTION VIEW



Jacobs

CAPSTONE DEVELOPMENT
PAINE FIELD INTERNATIONAL AIRPORT
EVERETT WASHINGTON

SECTION VIEWS

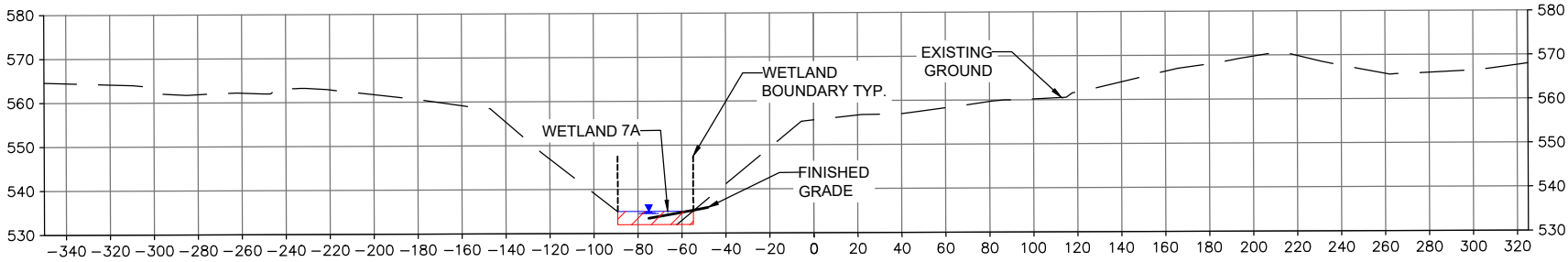
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DATE	AUGUST 13, 2024
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SHEET	3 OF 5

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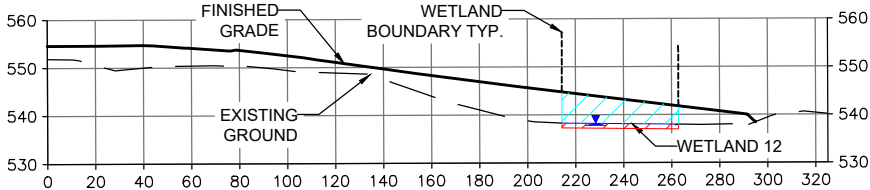
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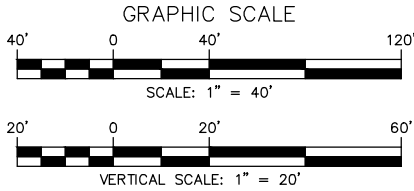
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1 WETLAND 7A SECTION VIEW



2 WETLAND 12 SECTION VIEW



Jacobs

SECTION VIEWS



CAPSTONE DEVELOPMENT
PAINE FIELD INTERNATIONAL AIRPORT
EVERETT WASHINGTON

VERIFY SCALE

BAR IS ONE INCH ON ORIGINAL DRAWING.

DATE AUGUST 13, 2024

PROJ

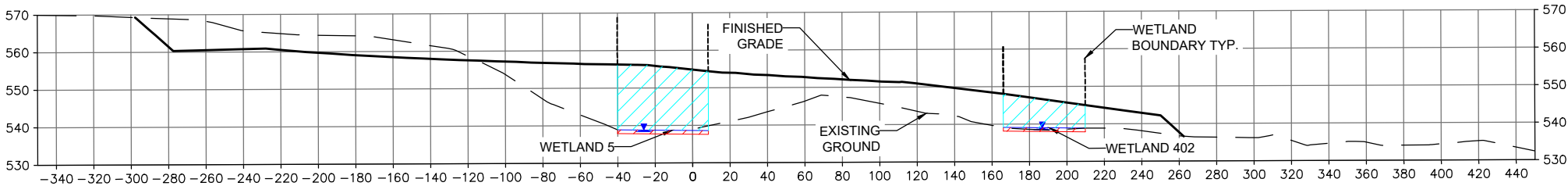
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SHEET 4 OF 5

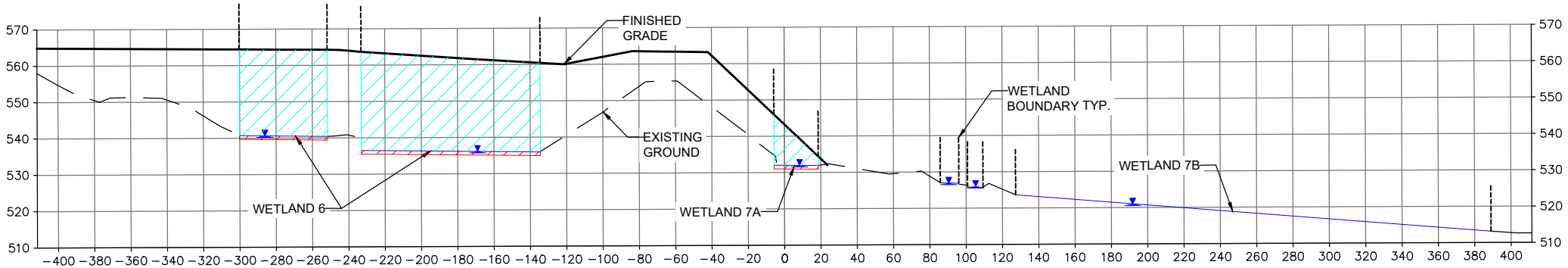
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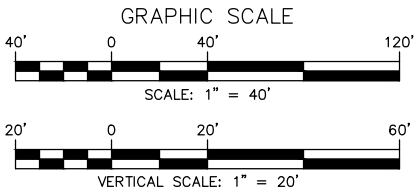
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1 WETLANDS 5 & 402 SECTION VIEW



2 WETLANDS 6, 7A, 7B NORTH-SOUTH SECTION VIEW



Jacobs

SECTION VIEWS



CAPSTONE DEVELOPMENT
PAINE FIELD INTERNATIONAL AIRPORT
EVERETT WASHINGTON

VERIFY SCALE

BAR IS ONE INCH ON ORIGINAL DRAWING. 1"

DATE AUGUST 13, 2024

PROJ

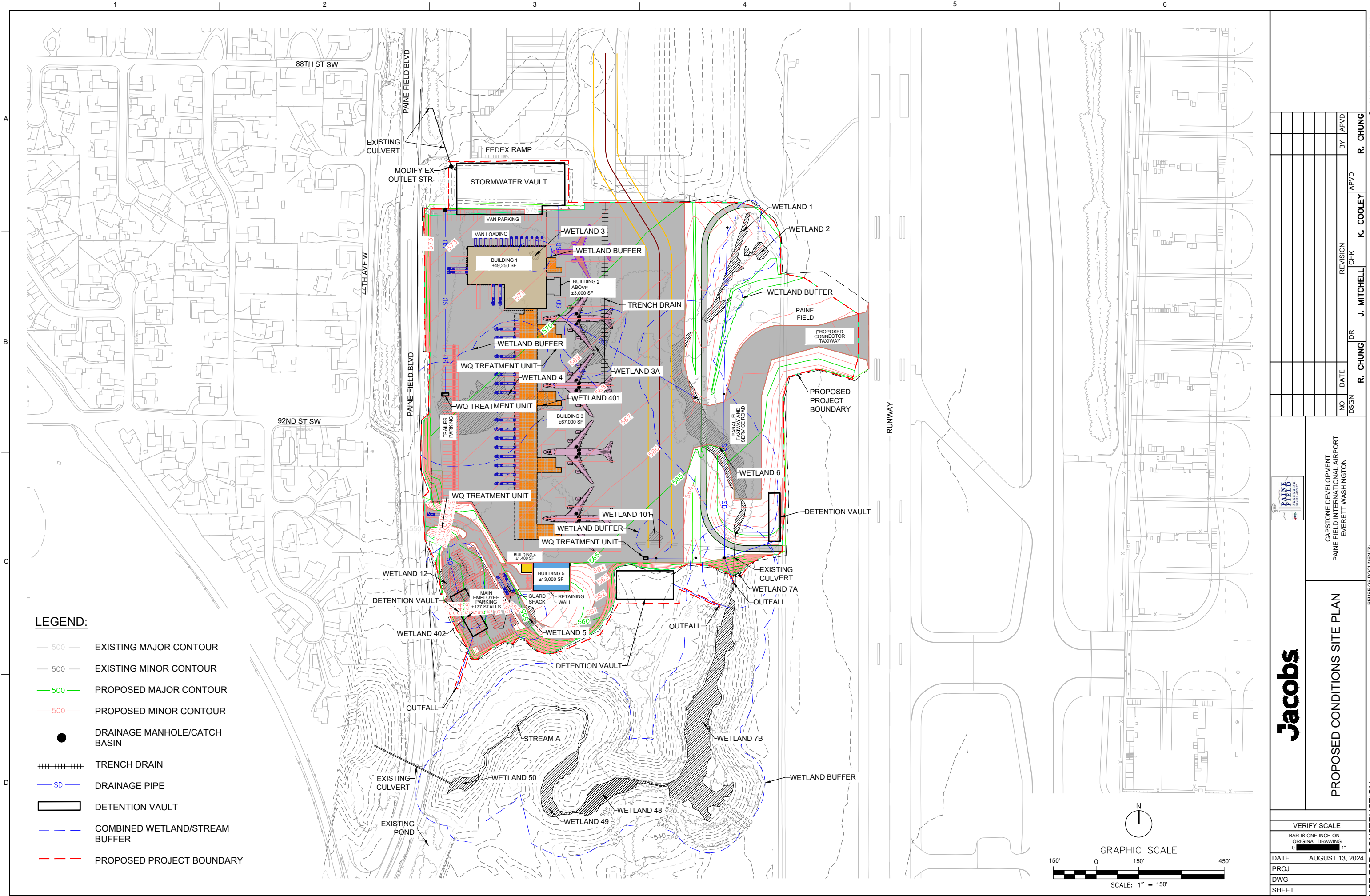
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SHEET 5 OF 5

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From: [Nancy Johnson](#)
To: bill@liderengineering.com
Cc: [Contact Council](#); [Mead, Jared](#); [Dunn, Megan](#); [Peterson, Strom](#); [County Executive](#)
Subject: Re: July 1, 2025 Planning & Community Development Committee, Table Motion 25-298, Paine Field Westside Aerospace Complex
Date: Monday, June 30, 2025 12:57:57 PM

On Mon, Jun 30, 2025 at 12:05 PM bill [liderengineering.com](mailto:bill@liderengineering.com) <bill@liderengineering.com> wrote:

I am contacting the County Council to request that no action be taken on [Motion 25-298](#) at the 11:00 am, July 1, 2025 Planning and Community Development Committee meeting.

The Paine Field Westside Aerospace Complex project will forever harm Big Gulch and Smuggler's Gulch Creeks and its salmonid population, without any adequate mitigation. This project violates County Code and State law as currently proposed.

This project is opposed by many local citizens, many environmental groups, and the City of Mukilteo, all who have standing to bring an appeal of any Water Quality Certification by Ecology before the Pollution Control Hearings Board, outside of County politics. Paine Field Airport has an abysmal track record in environmental compliance and the County's best interests will be served by allowing the Capstone contract to terminate.

Simply throwing money away on meaningless and worthless wetland mitigation in a different watershed in order to get a project permitted, is not mitigation.

I encourage all persons copied on this email to *return-reply all* to this email and let the County Council know your thoughts on this ill-conceived project.

William Lider, PE, CESCL

LIDER ENGINEERING, PLLC

2526 – 205th Place SW

Lynnwood, WA 98036

425-776-0671 Office

206-661-0787 Cell

From: [Julie Martinson](#)
To: [Contact Council](#)
Subject: Concern for wetlands at headwaters of Big Gulch & Smuggler's Gulch Creeks, Mukilteo
Date: Monday, June 30, 2025 8:38:41 PM

Dear Councilmembers,

I am writing with continuing concern over development plans that will negatively affect the wetlands at the headwaters of Mukilteo's Big Gulch and Smuggler's Gulch Creeks. This would greatly impact efforts to protect baby and young salmon survival.

I have a conflict with tomorrow morning's meeting at which Capstone & PAE is proposing to amend the Capstone & extend its development contract for another 3 years.

I ask that you do the following:

- 1) Table Motion 25-298 and take no action.
- 2) If Capstone cannot mitigate its impacts on the two creeks, then the project must be cancelled.
- 3) Understand that Wetland Banking in a different watershed is not mitigation.
- 4) Core Summer Salmonid Habitat & endangered species habitats must be protected.

Thank you for hearing my concerns for species that cannot speak for themselves. Both Orca and humans depend on salmon survival, as does the forest when they go upstream to spawn, contributing their decaying bodies to build healthy soil, thus contributing to carbon sequestration and fighting climate change.

Julie Martinson
2303 6th St
Everett, WA 98201

From: [Pam Tauer](#)
To: [Contact Council](#)
Subject: Please Table Motion 25-298 – Protect Big Gulch and Smuggler’s Gulch Creeks
Date: Monday, June 30, 2025 10:59:30 AM

Dear Snohomish County Councilmembers,

I am writing to respectfully urge you to **table Motion 25-298** regarding the proposed *Capstone Westside Aerospace Complex at Paine Field* and take no action at this time.

The proposed project would destroy **2.8 acres of wetlands at the headwaters of Big Gulch and Smuggler’s Gulch Creeks in Mukilteo**, which are critical **core summer salmonid and endangered species habitats**. If Capstone cannot mitigate its impacts on these two creeks, then the project must not proceed.

I am particularly concerned that:

- **Wetland banking in a different watershed is not true mitigation.**
The impacted reaches of Big Gulch and Smuggler’s Gulch Creeks would receive no ecological or hydrological benefit from mitigation credits purchased in a different WRIA.
- The project appears to conflict with **SCC 30.62A.550.2(b), WAC 173-700-301, and WAC 173-700-302**, which require mitigation to demonstrate benefits to the impacted watershed.
- Approval of this project in its current form, driven by projected revenue, risks **irreversible environmental damage** while undermining fair and independent environmental review under SEPA.

I understand the pressures the County faces to generate revenue, but these short-term financial gains do not outweigh the **long-term damage to salmon habitat, water quality, and our community’s resilience to climate change**.

I strongly urge you to:

1. **Table Motion 25-298.**
2. Require Capstone and Paine Field to demonstrate effective, local mitigation within the impacted watershed.
3. Protect Big Gulch and Smuggler’s Gulch Creeks for current and future generations.

Thank you for your commitment to responsible environmental stewardship and your service to Snohomish County residents.

Sincerely,

Pam Tauer
210 3rd Ave S, Apt C
Edmonds, WA 98020

Hickey, Lisa

From: ROBERT TUCKER <cougar1987@comcast.net>
Sent: Monday, June 30, 2025 9:27 AM
To: Contact Council
Subject: Comments To Paine Field Airport, Westside Aerospace Complex, Motion No. 25-298

We would like to provide the following comments to the Planning and Community Development Committee in advance of the subject meeting on Tuesday, July 1, 2025:

1. Please table Motion 25-298 and take no action. There are a variety of issues, flaws, and concerns with this motion that render it highly problematic.
2. If Capstone cannot mitigate its impacts on the two creeks, than the project must be cancelled. Capstone and PAE have not been able to demonstrate that its project will not seriously degrade Big Gulch Creek and Smuggler's Gulch Creek
3. Wetland Banking in a different watershed is not mitigation. [WAC 173-700-302](#) mandates that wetland mitigation bank credits demonstrate that the ecological and hydrological benefits of the bank extend beyond the bank site location. Impacted reaches of Big Gulch and Smuggler's Gulch Creek's core summer salmonid habitat will receive absolutely no benefit from the proposed wetland mitigation bank.
4. Core Summer Salmonid Habitat and endangered species habitats must be protected at every opportunity, including discarding the subject motion.

Below you will find previous comments provided to the Snohomish County Council on this same issue.

Robert and Kittie Tucker
Mukilteo, WA

Snohomish County Council Members,
We are contacting you to request your assistance in halting plans for development along the western portion of Paine Field airport.
Recently, we learned that the airport management has applied for a permit through the Washington State Department of Ecology to eliminate several acres of wetlands and fill multiple streams. We find these actions particularly troubling by themselves but after reviewing much of the associated permitting documentation we have come to learn that the impacted area drains into Big Gulch in Mukilteo, which drains to Puget Sound. We, and other Mukilteo citizens, have been advocating for several years to restore the health of Big Gulch including as a salmon stream. This action by Paine Field, if allowed, will undoubtedly negatively impact Big Gulch (most likely permanently). Paine Field believes that their destruction can be "mitigated" through wetland banking at Narbeck Park. The entire concept of wetland mitigation banking is ridiculous and never provides a net benefit to the natural world. The banked wetlands often become highly neglected sources of invasive species and never fulfill their intended function. Narbeck Park is a place we have visited regularly for nearly 30 years and watched as development has encroached upon it, pollution is released into the wetland, and invasive species have taken hold. All without any action from Paine Field or Snohomish County. Paine Field has yet to take responsibility for the PFAS "forever chemicals" that they allowed to be released into the subject (and other) streams. Why should we believe their intentions in this case will not have negative impacts to fish, wildlife, and humans? Paine Field has previously earned Salmon-Safe certification for its efforts to maintain water quality and natural habitats supporting salmon. This proposed development contradicts those earlier commitments and is extremely hypocritical.

We also recall that the Tulalip Tribes were recently awarded a grant to begin design on the improvement of the area where Big Gulch enters Puget Sound so that salmon will return in higher numbers again some day. It would appear that Paine Field's actions may also negatively impact this design and implementation effort. We have contacted the Tulalip Tribes regarding this issue. We are asking that you please investigate this issue and work to stop any additional development that will impact the wetlands and streams near Paine Field which drain into Puget Sound. Over the decades, this area has take for more than its share of damage and any further actions should be stopped.

From: winchell@wavecable.com
To: [Contact Council](#)
Subject: Westside Aerospace Complex, Motion No. 25-298
Date: Monday, June 30, 2025 9:30:11 PM

Dear Snohomish County Council members,

Please table Motion 25-298 and take no action on it. This project must be cancelled if Capstone can't mitigate the project's impacts on Smuggler's Gulch Creek and Big Gulch Creek. Wetland banking in a totally different watershed is NOT mitigation. Please don't be fooled by this tactic. We must protect core summer salmonid habitats and endangered species habitat. Please table this motion.

Sincerely,

Julia Winchell

22920 19th AVE NE

Arlington, WA 98223

From: [Clara Hsu](#)
To: [Contact Council](#)
Subject: Table Motion 25-298 and take no action
Date: Tuesday, July 1, 2025 6:51:37 AM

Count council,

I am writing to request that the Council table Motion 25-298 and take no action.

Paine Field Airport's (PAE) proposed Capstone Westside Aerospace Complex will destroy 2.8 acres of wetlands at the headwaters of Big Gulch and Smuggler's Gulch Creeks in Mukilteo.

Capstone and PAE have not been able to demonstrate that its project will not seriously degrade the two creeks.

Clara Hsu
Edmonds

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