



# PAINE FIELD

The Airport of Choice  
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COUNTY EXECUTIVE Aaron Reardon  
AIRPORT DIRECTOR Dave Waggoner

March 13, 2013

Attn: ATO-Terminal Services  
Federal Aviation Administration  
800 Independence Avenue, SW  
Washington, DC 20591

**Re: Snohomish County Airport-Paine Field (KPAE) Airport of National Interest: FAA Tower Closure**

Dear ATO Terminal Services Staff:

This letter is submitted in response to the March 8, 2013 email from the FAA announcing the closure of air traffic control towers at airports that had less than 150,000 total operations. The Snohomish County Airport – Paine Field FAA Tower is on the closure list despite being the only airport in Washington State designated in the **National** category by the FAA in the 2012 General Aviation Airport Study. Only 84 (2.8%) of the nation's 2,952 general aviation airports are in the **National** category. The closure of the FAA tower at Paine Field would have a major negative impact on the national interest.

Snohomish County Airport is one of the most important **National** airports with over 650 based aircraft (largest in five state region) and over 15,000 instrument operations (threshold for **National** designation is 5,000 instrument operations). It is a Reliever Airport and Alternate Airport to SeaTac, Boeing Field, NAS Whidbey, Bellingham and McChord AFB. The State of Washington's 2012 Aviation Economic Impact Study determined that the economic output of this airport is over \$19 billion/year—this is more than SeaTac and Boeing Field combined. Further, the total taxes paid to state and local governments by the Airport and its tenants exceed \$77 million/year.

The Airport is home to the Boeing manufacturing center that produces 747, 767, 777, 787 and KC-46A Tanker aircraft with about 41,000 direct jobs. This facility is the single largest contributor to the US balance of trade. There are another 10,000 aerospace jobs in the County that depend on the Airport. The aircraft deliveries from this airport total over \$40 billion each year.

Aviation Technical Services (about 1,000 jobs) is located here and provides maintenance, inspection and repair services to airlines such as Alaska, Southwest, American, UPS, and Delta for 737, 757, 767, 747 and MD 80 aircraft.

Paine Field is a Federally-certified National Disaster Staging Airport, the only non-DOD airport staging area in Washington. This designation requires that an airport be capable of supporting C-17 aircraft, staging for 150 patients, 24 ambulances, buses and proximity to several hospitals. The airport also provides 24/7 support to emergency service helicopters.

The Airport supports the world-wide aviation system with regular operations to and from airports worldwide. Boeing delivery flights, international air cargo flights and corporate jets operate here every day.

The proposal to close the Paine Field Air Traffic Control Tower would force the aviation operations to use non-towered airport procedures. These procedures involve multiple voice reports by pilots to announce their position and intentions with a goal of self control of operations. These procedures only work for general aviation airports without operations by large aircraft. Paine Field has multiple daily operations of transport category aircraft, such as the 747 and 777, and would not be compatible with non-towered procedures. The large aircraft fly different patterns and go twice the speed of small general aviation aircraft. Large aircraft leave a trail of wake turbulence that cannot be seen or detected, but can flip a small aircraft in an instant. The main runway is 9,010 feet long—nearly two miles. A pilot holding short at one end is unable to see aircraft along the whole runway or at many intersecting taxiways. Loss of FAA tower controllers would have a definite impact on safety and greatly reduce the number of operations that could be conducted on the main runway.

The Paine Field operations and traffic patterns include normal flights and unique “first flight” test procedures that are not seen at other airports. These include rejected take offs, simultaneous parallel runway operations, fixed wing and helicopter training at three FBOs, emergency service helicopter flights, corporate jets, and warbirds. Many airlines accepting new aircraft for flyaway require air traffic control tower services for flight operations. Lack of FAA tower services could have a significant impact on aircraft deliveries.

The closure of Paine Field Tower would have a severe impact on the national economy, most notably the aerospace industry and the balance of trade. It would impact the airport’s role as a reliever and alternate for SeaTac, especially in periods of marginal weather. It would compromise aviation safety by removing air traffic control from a very dynamic and complex control area.

I urge you to review the impacts at this airport and remove it from consideration of tower closure.



Dave Waggoner

Airport Director

Snohomish County Airport ~~444~~ -- Paine Field

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Cc: Senator Murray  
Senator Cantwell  
Representative Larsen  
County Executive Reardon  
County Council Chair Wright