



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
 REGION 10  
 1200 Sixth Avenue  
 Seattle, Washington 98101

Reply to  
 ATTN of:

ECO-083

FEB - 3 1998

OPTIONAL FORM 99 (7-90)

Colonel James M. Rigsby  
 District Engineer  
 Seattle District, Corps of Engineers  
 P.O. Box C-3755  
 Seattle, Washington 98124-2255

FAX TRANSMITTAL		# of pages ▶ 3
To <i>Debbie Miller</i>	From <i>Steve Roy</i>	
Dept./Agency	Phone #	
Fax #	Fax #	
NSN 7540-01-317-7368	5099-101	GENERAL SERVICES ADMINISTRATION

ATTN: Jonathan Freedman, Project Manager

RE: Public Notice 96-4-02325, Port of Seattle, December 19, 1997

Dear Colonel Rigsby:

We have completed our review of the above referenced public notice which proposes to fill 7.38 acres of wetlands for the construction of a third parallel runway at Seattle-Tacoma International Airport, including filling 5.46 acres of wetlands for the proposed third runway and 1.92 acres of wetlands fill at on-site borrow sites. Also proposed is filling 2.34 acre of wetlands to construct two new Runway Safety Areas. An additional proposed fill of 1.70 acres of wetlands to construct the South Aviation Support Area (SASA) facilities for airport support and maintenance facilities. Total wetland fill per the public notice is 11.42 acres as described in the table on sheet 6 of 29. Also on sheet 6 of 29 the foot note describes a total of approximately 12.23 acres of wetlands would be filled as a result of this project. Clarification is needed to account for the direct wetland impacts associated with this project.

The proposed work would also require filling and rechanneling approximately 980 feet of Miller Creek (0.25 of an acre), about 2,280 feet (0.15 of an acre) of drainage channels in the Miller Creek basin, and about 2,200 feet (0.5 of an acre) of Des Moines Creek.

As part of EPA's review, we read the proposed "mitigation plan" provided by the applicant and dated December 18, 1996. The direct acreage impacts to waters of the U.S. is different in this document than that included in the Public Notice.

After reviewing the above referenced public notice, the Environmental Protection Agency (EPA) has the following concerns and comments:

- The public notice and "mitigation plan" fails to identify appropriate compensatory mitigation for the wetland impacts. Essentially all of the on site

impacts are proposed to be mitigated off-site in the Green River Valley Watershed near Auburn, Washington. The proposed off-site mitigation cannot mitigate for those specific lost aquatic resources in the Des Moines Creek and Miller Creek Watersheds. EPA recognizes the need for achieving safe aircraft operations by minimizing bird strikes with aircraft, but it is EPA's position that public safety and environmental protection objectives can be mutually achieved. There are a number of wetlands within the Des Moines Creek and Miller Creek watersheds that could benefit from enhancement and restoration. We believe that incorporating mitigation in the impact basins will not create additional wildlife, but simply replace the lost habitat as a direct result of project implementation. We recommend the Corps of Engineers look for on-site (in basin) aquatic resources mitigation opportunities that would provide environmental benefits. The mitigation need not be open water but other wetland habitats that could be developed demonstrating aquatic resources benefits.

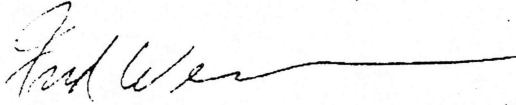
- The proposed project includes filling 1.70 acres of wetlands for the SASA. We believe there are opportunities for further avoidance by downsizing or changing the footprint of the SASA. Also the Corps of Engineers should evaluate other off-site existing facilities such as at Paine Field for meeting the overall project purpose for the SASA and avoiding the wetland impacts. EPA recommends the Corps conduct an independent alternatives analysis for the SASA that demonstrates the SASA is the least environmentally damaging practicable alternative per the Clean Water Act Section 404(b)(1) Guidelines.
- The applicant proposes to fill 1.92 acres of wetlands for on-site borrow sites. It is EPA's position that off-site borrow areas are available which would avoid the on-site impacts. EPA recommends the Corps of Engineers conduct an independent alternatives analysis for the on-site borrow areas and demonstrate that the borrow sites are the least environmentally damaging practicable alternative consistent with the 401(b)(1) Guidelines.

Based upon our concerns and comments as stated above, we can not conclude that this project complies with the Clean Water Act Section 404(b)(1) Guidelines. Accordingly, EPA recommends the permit be denied as proposed.

EPA is willing to meet with the applicant and Corps of Engineers to discuss and resolve the issues of identifying on-site mitigation in Des Moines Creek and Miller Creek Watersheds; avoiding the wetland fill at the SASA; and avoiding the wetland fill at the on-site borrow areas.

Should you have any questions or desire additional coordination concerning this project, please contact Steven Roy of my staff at (206) 553-6221.

Sincerely,

A handwritten signature in cursive script, appearing to read "Fred Weinmann", followed by a long horizontal line extending to the right.

Fred Weinmann, Acting Manager  
Aquatic Resources Unit

cc: Ecology  
WDF&W  
NMFS  
USFWS  
Applicant



September 24, 1996

Mr. Chuck Clark, Regional Administrator  
U.S. EPA Region X  
1200 Sixth Avenue  
Seattle, WA 98101

Dear Mr. Clark:

I have received a copy of the letter from Mr. Lowell Johnson of FAA dated July 15, 1996 and, as I have again spent the time to look through the final EIS, have the following comments regarding his assertion that FAA has conducted a cumulative impact analysis. For your convenience, I have cited the appropriate sections referred to in the above referenced letter and given the exact analysis presented in the final document itself:

Chapter IV *Consequences*

Section 1- "Noise" "However, until specific project plans are completed for these developments, the total cumulative impacts can not be identified." [IV.1-13-]

Section 2- "Land Use" No cumulative analysis

Section 3- "Historic" "However, until project specific plans are developed for these developments, the cumulative impacts can not be identified." [IV.3-4-]

Section 4- "DOT 4(f) Lands" "However, until specific project plans are completed for these developments, the total cumulative impacts can not be identified." [IV.4-8-]

Section 5- "Farmland" "As no prime or unique farmland exist in the immediate airport area, no cumulative direct impacts would be expected." [IV.5-2-]

Section 6- "Social Impacts" "However, until specific project plans are completed for these developments, the total cumulative impacts can not be identified." [IV.6-7-]

Section 7- "Human Health" No cumulative analysis

Section 8- "Socio-Economic" "At this time, the long-term and combined impact from the construction and operation of a number of facilities planned for the Sea-Tac Airport vicinity cannot be fully assessed or quantified with any degree of precision." [IV.8-12-]

Section 9- "Air Quality" No cumulative analysis

Section 10- "Water Quality" No cumulative analysis

Section 11- "Wetlands" "Loss of this amount of wetland area, however, should be viewed as one of many contributing to cumulative effects on natural resources in the Puget Sound Region." [IV.11-5-]

Section 12- "Floodplains" "Adverse impacts on floodplains or flooding in the Des Moines basin would potentially result from development of other proposed projects in the vicinity..." [IV.12-4-]

Section 13-14- "Coastal & Rivers" "Within the Airport vicinity, Angle Lake is the only waterbody under the jurisdiction of a local Shoreline Master Program, and it would not be affected by any of the Master Plan Update alternatives." [IV.13-1-]

Section 15- "Surface Transportation" "However, until specific projects are proposed for these developments, the total cumulative impacts can not be identified." [IV.15-7-]



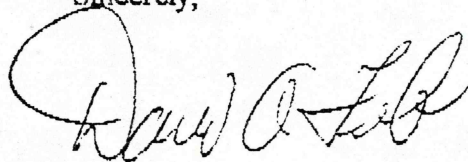
produce 2-3 ppm more CO during an 8-hour period. Thus, the same relationship presented in the Final EIS would exist at all intersections, but with higher pollutant levels.

You have also questioned if other intersections, not evaluated using CAL3QHC would result in any new exceedances or worsening of the exceedances with the regular gas assumption. We have reviewed all of the surface transportation data presented in Appendix O-B and the EPA's modeling guidelines for Carbon Monoxide and determined that the proposed Master Plan Update improvements would not create new exceedances of the NAAQS and that these improvements would not increase the severity of any existing exceedances. We request that you confirm the validity that this approach will meet the issues raised in your letter.

Your letter indicates that the EIS was not clear concerning the inclusion of a cumulative impact analysis reflecting all of the other surface transportation and major planned projects in the airport area. As we discussed in recent meetings, the Final EIS contains a detailed analysis reflecting the cumulative impact of an extensive number of known projects. Chapter II and applicable locations in Chapter IV, as well as Appendix O-B of the Final EIS detail these projects. Projects that were included in the cumulative analysis are: the Regional Justice Facility, the Des Moines Creek Technology Campus, the On-Airport Hotel, the City of SeaTac Airport Business Center, the SR 509 Extension/South Access and all other improvements included in the PSRC's Metropolitan Transportation Plan and Transportation Improvement Plan. Our Record of Decision will include a summary of the projects included in the cumulative impact analysis. We would appreciate being advised if there are other projects which you are concerned be included in the cumulative impact analysis.

Pending your response, we will proceed with the final conformity determination for the proposed improvements at Seattle-Tacoma International Airport.

Sincerely,



Lowell H. Johnson  
Manager, Airports Division  
Northwest Mountain Region