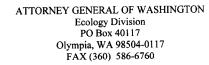
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7	BEFORE THE POLLUTION CONTROL HEARINGS BOARD STATE OF WASHINGTON	
8	STATE OF	WASHINGTON
9	AIRPORT COMMUNITIES	PCHB No. 01-160
10	COALITION,	OFFER OF PROOF RE: EXCLUDED
11	Appellant,	STATEMENTS FROM DAVE
12	CITIZENS AGAINST SEA-TAC EXPANSION,	GARLAND'S TESTIMONY
13	Intervenor/Appellant,	
14	v.	
15	STATE OF WASHINGTON,	
16	DEPARTMENT OF ECOLOGY; and PORT OF SEATTLE,	
17	Respondents.	
18		
19	On March 21, 2002, the Board ordered Ecology to redact portions of Dave Garland's	
20	testimony and submit revised direct testimony on behalf of Dave Garland. Ecology has	
21	submitted Mr Garland's revised testimony under separate cover as "Revised Direct Testimony	
22	of Dave Garland Submitted on Behalf of the Department of Ecology. Ecology submits this	
23	document to memorialize the excluded st	atements from Mr. Garland's testimony. The

24 || excluded statements are as follows:

4. Most recently, I reviewed PGG's updated modeling of the embankment for the
December 2001 Low Stream Flow Analysis and Summer Low Flow Impact Offset Facility

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Proposal submitted by the Port of Seattle. The results of my reviews have been documented
 in memos to Ann Kenny and others dated March 9, 2001, May 5, 2001, August 7, 2001, and
 March 6, 2002.

11. The report by Pacific Groundwater Group (PGG) of November 27, 2001 titled, "Port of Seattle Sea-Tac Third Runway Embankment Fill Modeling in Support of Low-Streamflow Analysis", which occurs as Appendix B in Low Streamflow Analysis and Summer Low Flow Impact Offset Facility Proposal (Port of Seattle, December 2001) presents significant drainage estimate improvements for the proposed runway fill embankment over drainage estimates presented in "Sea-Tac Airport Master Plan Update Low Streamflow Analysis" (Earth Tech, 2000).

12. The improvement contained in the current report is a 'fill-depth sensitive' integration of the proposed embankment fill hydrology, which sums the drainage contribution from the embankment over the entire length of the runway. PGG accomplished this integration by using Hydrus and Slice models operating on three hydrogeologic cross sections, which were representative of the range of proposed embankment geometries.

V. Conclusions

17 20. In summary, although I have not reviewed the computations of the Hydrus-Slice model in detail, it is my opinion based on my familiarity with the model's development, 18 my experience as a hydrogeologist, and my previous reviews, that the assumptions used in the 19 model are reasonable. Further, PGG's December 2001 version of the Hydrus-Slice 20 embankment fill model contains significant improvements over the December 2000 Low 21 Streamflow Analysis offered by the Port. With the above mentioned improvements to the 22 embankment hydrology model, I have reasonable assurance that drainage from the proposed 23 //// 24

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1	fill embankment is adequately characterized for modeling purposes to protect low streamflows
2	in Miller and Walker Creeks.
3	DATED this 26 day of March, 2002.
4	CHRISTINE O. GREGOIRE
5	Attorney General
6	7-6 8 17
7	THOMAS J. YOUNG, WSBA # 17366 Assistant Attorney General
8	Attorneys for Respondent State of Washington, Department of Ecology (360) 586-4608
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