

ACC's Prefiled Testimony, Binder #2 of 4:

Testimony of Dr. Malcolm Leytham, Tom Luster
and Sally Nelson

ACC & CASE v. DOE & POS, PCHB No. 01-160 02/22/02

BINDER 3

AR 014291

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**Pre-Filed Testimony
of
Dr. Malcolm Leytham
Thomas Luster
and
Sally Nelson**

**Submitted on behalf of Appellant
Airport Communities Coalition**

**PCHB No. 01-160
*ACC & CASE v. Dept. of Ecology & Port of Seattle***

February 22, 2002

Binder #2 of 4

AR 014292

**Index to Pre-Filed Testimony
of
Airport Communities Coalition**

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Binder #1:

Prefiled Testimony of Amanda Azous, with exhibits:

- A Curriculum Vitae of Amanda Azous
- B Wetlands and Urbanization: Implications for the Future, by Amanda Azous and Richard Horner, 2001
- C Table 4.1-3 from the November 2001 Natural Resources Mitigation Plan
- D Copies of Stream Regulations from the City of SeaTac and King County
- E Photos of Vacca Farm taken by Amanda Azous
- F Figure 2.2-2 from the November 2001 Natural Resources Mitigation Plan: Map of Vacca Floodplain
- G Letter dated December 5, 2001, from Dept of Ecology letter (Ms. Sarah Suggs) to Mr. Grant Beck, San Juan County Permit Department
- H Figure 2.1-4 from November 2001 Natural Resources Mitigation Plan: Jurisdictional Wetlands on the Vacca Farm Site
- I Letter dated March 28, 2001, from Dept. of Ecology (Mr. Erik Stockdale) to Mr. Don Scarberry, Novadyne Engineering
- J Verbatim Report of Proceedings dated June 5, 2001, in *Port of Seattle v. RST Enterprises*, King County Cause No. 99-2-26788-5 KNT

Prefiled Testimony of Dr. Ed Kavazanjan, with exhibits:

- A. Curriculum Vitae of Dr. Ed Kavazanjan
- B. HartCrowser report dated November 2, 2001, "Geotechnical Summary Report Third Runway Embankment and MSE Retaining Walls, Seattle-Tacoma International Airport"
- C. February 16, 2001 letter from GeoSyntec to the Army Corps of Engineers; comments on the Embankment Fill and West MSE Wall
- D. Cover page and pages III-28 – III-42 of April 2001 responses to comments made by GeoSyntec Consultants February 16, 2001 letter.

Binder #2:

Prefiled Testimony of Dr. Malcolm Leytham, with exhibits:

- A. Curriculum Vitae of Dr. Dr. Malcolm Leytham
- B. Figure B2-41 from Appendix B to the July 2001 Stormwater Management Plan update comparing observed and simulated streamflow in Walker Creek
- C. Stormwater Management Plan, Appendix B, Figure B2-2 to the July 2001 update, "Groundwater Flow Direction and Boundaries"
- D. December 2001 Low Flow Plan, Figure (unnumbered) "Change between Existing (1994) and Future (2006) Groundwater Basins"
- E. December 2001, Low Flow Plan figure s 3-5 and 3-6 Low Flow Calibration review
- F. December 2001 Stormwater Management Plan, Appendix B, figure B2-9, "Observed vs. Simulated Stream Flow Miller Creek at RDF"
- G. December 2001 Low Flow Plan Figure 4-11, Low Flow Calibration Review
- H. December 2000 Stormwater Management Plan Appendix A unnumbered figure HFAM Output February 1999
- I. Photographs of standing water on the fill embankment, 28 January, 2002
- J. Photograph of failure in the fill embankment, 28 January 2002
- K. December 2001 Low Flow Plan, Appendix B, Table 3-1 embankment modeling report

Prefiled Testimony of Mr. Tom Luster, with exhibits:

- A. Declaration of Thomas R. Luster, dated September 10, 2001
- B. Reply Declaration of Tom Luster in Support of Stay, dated October 7, 2001
- C. Deposition Upon Oral Examination of Thomas Luster, dated February 1, 2002
- D. NPDES Permit No. WA0037953, dated February 7, 2002, for Cascade Pole and Lumber Company

- E. 1998 401 Certification issued by Dept. of Ecology to Port of Seattle for Third Runway Project
- F. 1998 Dept. of Ecology Reasonable Potential Analysis

Prefiled Testimony of Ms. Sally Nelson (no exhibits)

Binder #3:

Prefiled Testimony of William A. Rozeboom, P.E., with exhibits:

- A. Curriculum Vitae of W. A. Rozeboom
- B. Letter dated November 24, 1999 from Northwest Hydraulic Consultants, Inc. commenting on the stormwater management plan for the proposed 3rd runway
- C. Title page and pp. 227 – 240 of the Port of Seattle’s March 10, 2000 responses to public comments. The enclosed pages respond to the comments in Exhibit B
- D. Letter dated February 15, 2001 from Northwest Hydraulic Consultants, Inc. to the U.S. Army Corps of Engineers, with comments on stormwater, hydrology and hydraulic aspects of the 3rd runway proposal
- E. Title page and pages III-74 – 84 of Port’s responses to the letter from February 15, 2001, listed above as Exhibit D
- F. Letter dated June 25, 2001, from Northwest Hydraulic Consultants, Inc. to the U.S. Army Corps of Engineers, with follow-up comments on the stormwater, hydrology, and hydraulic aspects of the 3rd runway proposal
- G. Introduction and overview pages from the 1998 *King County Surface Water Design Manual*
- H. Letter dated December 18, 2001, from Northwest Hydraulic Consultants, Inc. to U.S. Army Corps of Engineers, which outlines inconsistencies in the Port of Seattle Documents
- I. Page 1 and pages 22 – 25 of the Section 401 Certification issued on September 21, 2001

- J. Cover pages and Table 3-1 on page G-23 of the 1996 FEIS Appendix G by Montgomery Water Group, a summary of land use changes in SeaTac Subbasins assumed for proposal
- K. Title page and Table 4-1, page 4-4 of the December 2000 Comprehensive Stormwater Management Plan illustrated baseline 1994 and projected 2006 changes in drainage areaa of Miller, Walker and Des Moines Creeks
- L. Cover page and page 11, Condition S1.F.2 of the airport's NPDES Permit No. WA-002465-1
- M. Title page and Figure 1.3-1 of the NRMP titled, "Master Plan Update Improvements at STIA"
- N. Port of Seattle – Commission Agenda Item No. 8a for meeting held on November 13, 2001, a memorandum dated October 16, 2001 regarding Resolution No. 3469, agreements between the Port of Seattle and the City of SeaTac for use and redevelopment of borrow areas 3 and 4 on Port property within the City
- O. Low Flow Plan Appendix I (determination of Low Flow Quantity Impacts), bar chart showing 7-day low flow occurrences in Walker Creek

Prefiled Testimony of Dyanne Sheldon, with exhibits:

- A. Curriculum Vitae of Dyanne Sheldon
- B. Declaration of Dyanne Sheldon in Support of ACC's Motino for Stay, dated October 5, 2001
- C. Letter dated March 28, 2001, from Erik Stockdale, Dept. of Ecology, to Don Scarberry, Novadyne Engineering
- D. Verbatim Report of Proceedings dated June 5, 2001, in *Port of Seattle v. RST Enterprises*, King County Cause No. 99-2-26788-5 KNT
- E. Wetland Mitigation Calculations: Vacca Farm
- F. Excerpt from Compensating for Wetland Losses Under the Clean Water Act, by Committee on Mitigating Wetland Losses, et al., 2001
- G1. Washington State Wetland Mitigation Evaluation Study, Phase 1: Compliance, June 2000, Dept. of Ecology Publication No. 00-06-016
- G2: Wetland Mitigation Evaluation Study: Phase 2

- H. Tables 5.2-12, 5.1-7, 5.3-6 and 7.7-1 from the Natural Resources Mitigation Plan
- I. Wildlife Hazard Management at Airports, dated 12/99, by the Federal Aviation Administration
- J. Plan sheet: "Changes in Peat and Muck Soil at Vacca Farm," STIA-9805-C1, by Parametrix, Inc., November, 2001
- K. Figure 5.1-6 from Natural Resource Mitigation Plan
- L. Figure 5.1-3 from Natural Resource Mitigation Plan
- M. Memorandum dated 04/06/98 from Paul Tappel to Jim Kelley, Re: Minor Edits & Questions, SeaTac JARPA
- N. Figure 5.1-7 from Natural Resource Mitigation Plan
- O. Declaration of Dyanne Sheldon in Support of ACC's Sur-Reply on Motion for Stay, dated October 10, 2001

Pre-Filed Testimony of Dr. John Strand, with exhibits:

- A. Curriculum Vitae of Dr. John Strand
- B. List of Documents and Scientific Literature Relied upon in Testimony related to Section 401 Water Quality Certification for Third Runway at Sea-Tac Airport
- C. Photograph taken by Dr. Strand on January 28, 2002 at the location of an outfall in the tank farm to the East Branch of the Des Moines Creek
- D. Letter from Elizabeth Clark, Port of Seattle, to Roger Nye, Department of Ecology, dated February 4, 2000, regarding fill from Hamm Creek
- E. Memo from Beth Doan, U.S. Army Corps of Engineers, to Paul Agid, Port of Seattle, dated March 24, 1999, regarding the Hamm Creek Coil Quality Review
- F. Letter from Paul Agid, Port of Seattle, to Chung Yee, Department of Ecology, dated July 27, 2000, transmitting environmental documentation for fill material

- G. Letter from Thomas Madden, Department of Transportation, to Elizabeth Clark, Port of Seattle, dated November 29, 1999, regarding potential use of fill from the First Avenue Bridge project
- H. Memo from Beth Clark, Port of Seattle, to Paul Agid, Port of Seattle, dated April 30, 2001, regarding potential fill from the Black River Quarry

Binder #4:

Prefiled Testimony of Dr. Peter Willing, with exhibits:

- A. Curriculum Vitae of Dr. Peter Willing
- B. List of Documents and Information Relied Upon in Testimony Related to 401 Water Quality Certification for Third Runway at Sea-Tac Airport
- C. Two photographs taken by Dr. Willing on January 28, 2002, during Third Runway-area site visit
- D. Flow Hydrographs for two wastewater treatment facilities (City of Bellingham Post Point wastewater treatment plant and Midway Sewer District treatment facility)
- E. "Influence of Highway Runoff Chemistry, Hydrology and Residence Time on Non-Equilibrium Partitioning of Heavy Metals -- Implications for Treatment at the Highway Shoulder," by D. Glenn, D. Liu, and J. Sansalone
- F. Letter dated March 12, 2001, from Dr. Peter Willing to Mr. Chung Yee, Dept. of Ecology, Re: NPDES Permit Major Modification
- G.
 - Ecology spreadsheet (excerpt from TSDCALC9.XLW);
 - Stormwater Quality Data spreadsheet by Dr. Peter Willing;
 - Two spreadsheets from 1998-99 POS Annual Stormwater Monitoring Report;
 - Water Hardness Data spreadsheet by Dr. Peter Willing

Prefiled Testimony of Mr. Greg Wingard, with exhibits:

- A. Curriculum Vitae of Greg Wingard
- B. STIA Construction Site Stormwater Monitoring reports dated 10/16/00, 6/27/01, and 9/26/01
- C. Sample DMR reports
- D. Reports dated 2/11/02 from Analytical Resources, Inc. with results of sample analysis
- E. December 12, 2001, Chemical Characterization Report from the Black River Quarry, prepared for Port by HartCrowser
- F. December 20, 2001, NPDES Renewal Application