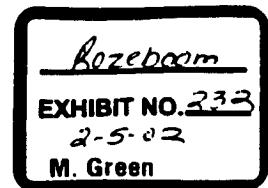


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April 11, 2001

Mr. Gordon White
Program Director
Shorelands and Environmental Assistance Program
Washington State Department of Ecology
300 Desmond Drive SE
Lacey, WA 98503

Subject: Ecology Review of SeaTac Airport Low Streamflow Analysis

Northwest Hydraulic Consultants (nhc) has been retained on behalf of the Airport Communities Coalition (ACC) to provide a technical review of stormwater facilities and related streamflow impacts from the proposed 3rd runway development at SeaTac airport. This is our ninth letter to Ecology on the ACC's behalf. Our letters dated 11/24/1999, 5/3/2000, 7/31/2000, 9/7/2000, 9/21/2000, 9/25/2000, and 9/27/2000 identified significant problems with the now-superseded November 1999 and August 2000 versions of the Stormwater Management Plan (SMP). Our letter dated 2/15/2001 (copy enclosed) identifies significant problems with the most recent December 2000 version of the SMP and related documents which include the December 2000 "Seattle-Tacoma Airport Master Plan Update Low Streamflow Analysis."

The purpose of this letter is to express concern over a recent Ecology memorandum (copy enclosed) dated 3/9/2001 which provides a review of the December 2000 "Seattle-Tacoma Airport Master Plan Update Low Streamflow Analysis." The Ecology memorandum provides an excellent summary of the approach and conclusions of the low streamflow analysis, but fails to provide a meaningful critique of the study and fails to acknowledge shortcomings and concerns raised by us and by others. Serious technical concerns on the low streamflow analysis have been expressed to Ecology in pages 11 through 13 of our letter of 2/15/2001 and also in pages 22 through 24 (copy enclosed) of King County's 2/22/2001 review comments on the December 2000 SMP. It is troubling that the Ecology memorandum, dated after Ecology's receipt of public comments, appears to be endorsing the low streamflow study methods and conclusions without any apparent acknowledgment or consideration of the substantial technical concerns raised by others and us.

What are some of these substantial technical concerns? The hydrology analysis does not truly represent the existing basin conditions because year 2006 future sub-basins and future diversions to the Industrial Wastewater System are used to define "existing" conditions. The documentation for the low-flow impact analysis fails to include hydrology model input files for Walker or Des Moines Creek and fails to confirm what assumptions were made in the analysis. The analysis does not consider the low-flow impacts of ongoing programs to prevent seepage and leaks from the Industrial Wastewater System, such

as the ongoing program to line all of the system's storage lagoons. The analysis does not consider the low-flow impacts of large-scale gravel mining operations at Borrow Areas 1, 3, and 4 immediately south of the airport, and the resultant elimination of what are essentially the last remaining forested headwater areas in the Des Moines Creek basin. The analysis ignores the fact that the runway embankment seepage characteristics which were assumed in the low-flow analysis, based on theoretical geotechnical assessments, are inconsistent with the embankment seepage characteristics which were inferred from recent field measurements of actual embankment runoff. These are just some of the substantial technical concerns which have previously been raised and brought to Ecology's attention.

We have three requests/recommendations. First, the 3/9/2001 Ecology memorandum on the low streamflow analysis should be regarded as incomplete since it fails to consider relevant technical comments prepared by others and submitted to Ecology. Second, Ecology should revisit its review of the low streamflow analysis, giving consideration and recognition to applicable comments submitted by others and us. Finally, we again request on behalf of the Airport Communities Coalition that, prior to regulatory certification, the applicant be required to respond to the issues we have raised in our 2/15/2001 letter, and that we be granted the opportunity to provide follow-up review and comment on that response.

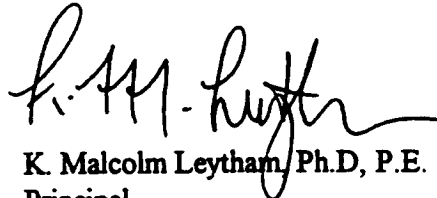
Thank you for your consideration of our concerns.

Sincerely,

NORTHWEST HYDRAULIC CONSULTANTS, INC.



William A. Rozeboom, P.E.
Senior Engineer



K. Malcolm Leytham, Ph.D., P.E.
Principal

Enclosures: Ecology memorandum of 3/9/2001 (3 pages)
NHC letter of 2/15/2001 (19 pages, w/o enclosures)
Excerpts from Enclosure 2 of King County letter of 2/22/2001 to Ann Kenny

cc: Kevin Fitzpatrick, Department of Ecology
Ann Kenny, Department of Ecology
Dave Garland, Department of Ecology
Peter Eglick, Helsell Fetterman LLP
Kimberly Lockard, Airport Communities Coalition

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