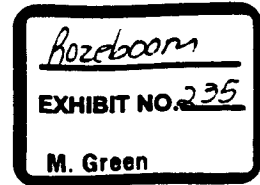


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July 23, 2001

Mr. Gordon White
Program Director
Shorelands and Environmental Assistance Program
Washington State Department of Ecology
PO Box 47600
Olympia, WA 98504-7600

Subject: Follow-up comments on low streamflow analyses

Thank you for meeting with the Airport Community Coalition's team of technical experts on July 10, 2001 to hear a first-hand summary of outstanding SeaTac Airport 401 Certification issues, including our comments on low streamflow impacts from proposed development actions. This follow-up letter is being submitted in response to additional low streamflow analyses materials which were subsequently obtained by the ACC from Ecology on July 12, 2001. The specific materials are two email documents regarding "low flow data for Des Moines Creek," with spreadsheet attachments, transmitted on July 6, 2001 by Parametrix (the Port's consultant) to Ecology and others. Our follow-up comments also apply to four email documents regarding "Monday Meeting" and "Miller Creek Update" with low-flow analysis spreadsheet attachments for Des Moines, Walker, and Miller Creek, transmitted on July 12 and 13, 2001 by Parametrix to Ecology, and obtained by the ACC on July 18, 2001.

The additional materials show that a low streamflow analyses is in progress which has the appearance of being significantly more detailed than the analyses which were available for review at the time of the latest public comment period. Our concern, based on the Port's responses to our February 15, 2001 comment letter, is that these seemingly-detailed analyses are likely still based on models of uncertain suitability for assessing upper-basin low-flow impacts, that airport impacts on low streamflows are likely still being underestimated, and that the corresponding sufficiency of any proposed mitigation measures will likely continue to be highly uncertain. Our underlying concerns as stated previously include: 1) the Port's emphasis on model calibration to lower basin gages rather than upper basin gages which are more relevant to an examination of airport impacts; 2) a failure to account for low-flow impacts likely to result from the post-1994 expansion of and improvements to the Industrial Wastewater System, including lagoon linings and other leak reduction efforts; and 3) a failure to address low-flow impacts of future airport business park development at the site of proposed borrow pits which will eliminate what are now forested areas of the upper Des Moines Creek Basin. At this time it would however be speculative for us to provide comments beyond those already provided.

July 23, 2001

We request on behalf of the ACC that a final report documenting the results of the in-progress low streamflow analysis and mitigation proposal should be issued and subject to public comment before Ecology relies upon that analysis or proposal for its 401 decision.

Sincerely,

NORTHWEST HYDRAULIC CONSULTANTS, INC.

A handwritten signature in black ink that reads "William Rozeboom" followed by a horizontal line.

William A. Rozeboom, P.E.
Senior Engineer

cc: Ann Kenny, Ecology Shorelands and Environmental Assistance Program
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