



July 31, 2000

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Subject: Approval process for stormwater management plan for proposed 3rd runway development actions at Seattle-Tacoma International Airport.

Northwest Hydraulic Consultants (nhc) has been retained on behalf of the Airport Communities Coalition to provide a technical review of stormwater facilities and related streamflow impacts from the proposed 3rd runway development at SeaTac airport. By a letter dated November 24, 1999, we provided our initial comments from our technical review of documents describing the Stormwater Management Plan (SMP) for Master Plan Update Improvements at Seattle-Tacoma International Airport. By a letter dated May 3, 2000, we provided follow-up comments resulting from our technical review of additional materials which were not available at the date of the initial review. The purpose of this letter is to remind you that the numerous substantial comments raised by us and by others have, to our knowledge, not yet been satisfactorily addressed, and to express concern over what has become a closed-door design review process.

Independent technical reviews by other experts under contract to the Department of Ecology have consistently corroborated our concerns. A limited-scope review by Pacific Groundwater Group¹ found serious "fundamental questions" in the hydrologic modeling which, if left uncorrected, would have led to the construction of facilities which would be generally undersized and would not achieve the required levels of flow control. A broader-scope review by King County of "technical" issues identified numerous specific problems before even considering the issue of hydrologic model calibration which seems to have since become the main focus of SMP revisions.

A large number of substantive issues and concerns have been raised which all need to be addressed if there is to be confidence in the SMP as a design document which will accomplish the regulatory goals of flow control and environmental protection. Copies of our previous comment letters are enclosed for reference. To our knowledge, substantially all of our previous comments remain unresolved at this time.

The very limited information which has been disclosed from the King County review of the SMP indicates that King County has also raised numerous additional specific concerns which, to our knowledge, are also unresolved at this time. We refer in particular to an 11-page document with draft preliminary review comments dated 4/5/2000 which is in the files of both the Corps and Ecology and which was obtained by the ACC through public information disclosure requests. It should be noted that the 4/5/2000 document does not deal at all with model calibration, which was first raised by us as a major concern via email to concerned parties on 4/4/2000. We understand from verbal

¹Sea-Tac Runway Fill Hydrologic Studies Report, June 19, 2000.

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discussion with Ecology that follow-up SMP revisions have focused nearly entirely on the single issue of HSPF model calibration.

We are concerned that in the recent push to reach resolution on the issue of hydrologic model calibration, many other substantive issues and concerns will be neglected. Those other issues are identified in our previous letters and in the King County comments. New issues may still arise as other closely-related plans and documents, such as for the proposed expansion of the Industrial Wastewater System, are obtained and reviewed.

We request on behalf of the Airport Communities Coalition that, prior to regulatory certification or approval of the proposed 3rd runway project, there be full disclosure of whatever Stormwater Management Plan discussions and agreements are now being made out of the light of public scrutiny, and that there be a meaningful time period for further review and comment on whatever SMP documents emerge from that process.

Sincerely,

NORTHWEST HYDRAULIC CONSULTANTS, INC.

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Enclosures

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