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ENVIRONMENTAL
SCIENCES

June 5, 2000

Ms. Gail Terzi and Mr. Jonathan Freedman
US Army Corps of Engineers
Regulatory Section, Seattle District
PO Box 3755
Seattle, WA 98124-2255

RE: Review of Wetland 44a in Relation to Proposed Temporary Interchange at SR509 and S. 176th Street.

Dear Ms. Terzi and Mr. Freedman,

The Airport Communities Coalition (ACC) requested that I review Wetland 44a and its relationship to the east side of the proposed SR509 temporary interchange located in the City of SeaTac. The purpose of my review was to evaluate whether wetland 44a (using the delineation provided in the Parametrix Memorandum, dated May 3, 2000, entitled *Analysis of indirect impacts to wetlands from the temporary SR-509 interchange- Seattle Tacoma Airport*) was correctly located on the project plans (signed February 24, 2000) and hydraulic report (April 12, 2000), both prepared by HNTB Corporation.

I visited the area on June 1, 2000 and, with the permission of adjacent property owners, walked west from S. 174th Street to Manhole AC-5 and the chain link fence located along the right of way of SR509 (shown on Map 1 of this report). Map 1 shows a sewer line, manhole locations and the chain link fence defining the right of way, in relation to SR509. The map was prepared for Southwest Suburban Sewer District in 1984. I located each of the manholes shown on Map 1 and noted their location in relation to the chain link fence shown to be on the right-of-way in Map 1 and Wetland 44a. I followed the fence south and noted the topography while reviewing the topographic map with the wetland boundaries provided in sheet GP-2 Grading Plan of the project plans prepared by HNTB along with the boundaries of the wetland provided by Parametrix in their May 3rd Memorandum.

It is very difficult to understand what existing conditions are with the materials provided by HNTB and Parametrix. The project plans prepared by HNTB do not show topography without a wetland overlay and the shading used to indicate the wetland areas makes it very difficult to read the topography. Similarly, the wetland delineation map provided by Parametrix has few topographic lines shown on it and they do not agree with the contours shown on HNTB's maps. Compounding the problem is that the wetlands map does not have the centerline of SR509 clearly marked making it difficult to align the maps properly.

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After visiting the site and reviewing the materials carefully, it is clear there is a significant discrepancy between what actual conditions are on the east side of SR509 and what is shown on sheet GP-2 Grading Plan in the project plans prepared by HNTB. Map 2 shows a portion of the GP-2 grading plan overlaid on Map 1, the sewer line plan. It is difficult to see the contours with the wetland shading superimposed but there is a depression located in the northern end of Wetland 44a. I shaded the bottom of the depression red to help you see it. During my field visit I stood on Manhole covers AC-5 and AC-5a (best seen on Map 1 on the left). From both manhole covers I saw the chain link fence located west along the right-of-way and, west of the fence, observed the depression shown in red on Map 2. From these observations, the depression appears to be located within the right-of-way, and not to the east of the right-of-way as is shown on the project plans and in the hydraulic report prepared by HNTB.

The depression I observed is clearly within the wetland and was located west of the chain link right-of-way fence. There were no other depressions in the area that could have been mistakenly identified. Based on the data available, it is reasonable to assume Wetland 44a may be 20 to 40 feet closer to SR509 then what is shown in the project plans. Under the circumstances it can be reasonably expected that significant impacts resulting from sedimentary discharges will occur to Wetland 44a as a result of the interchange construction.

Wetland 44a essentially begins at the base of the fill prism for SR509 and its boundary lies adjacent to the highway for much of its length. I noted two small creeks flowing from east to west (shown on Map 1). These creeks feed Walker Creek, which flows from south to north through Wetland 44a, then west under SR509 to Wetland 43 and ultimately Miller Creek. This creek system, connecting the wetlands and tributary to Miller Creek, is not detailed in any of the reporting on this project. This is a significant oversight because impacts, including sedimentary discharges, to Wetland 44a and its associated creeks will significantly affect wetlands 43, and 44a, Walker Creek as well as Miller Creek due to the hydraulic connection between these systems.

In summary, the location of Wetland 44a is not correctly shown on the topography on which the project plans for the temporary interchange is based. The error, depending on its explanation, could mean the wetland is located significantly closer to the construction zone than what is shown in the project's documentation. This condition could result in significant sedimentary discharges to Wetland 44a. I hope this information is helpful. Please call if you have any questions or would like to discuss these findings further.

Sincerely,

Amanda Azous

Cc: Airport Communities Coalition (ACC)
Peter Eglick, Helsell Fetterman, LLP

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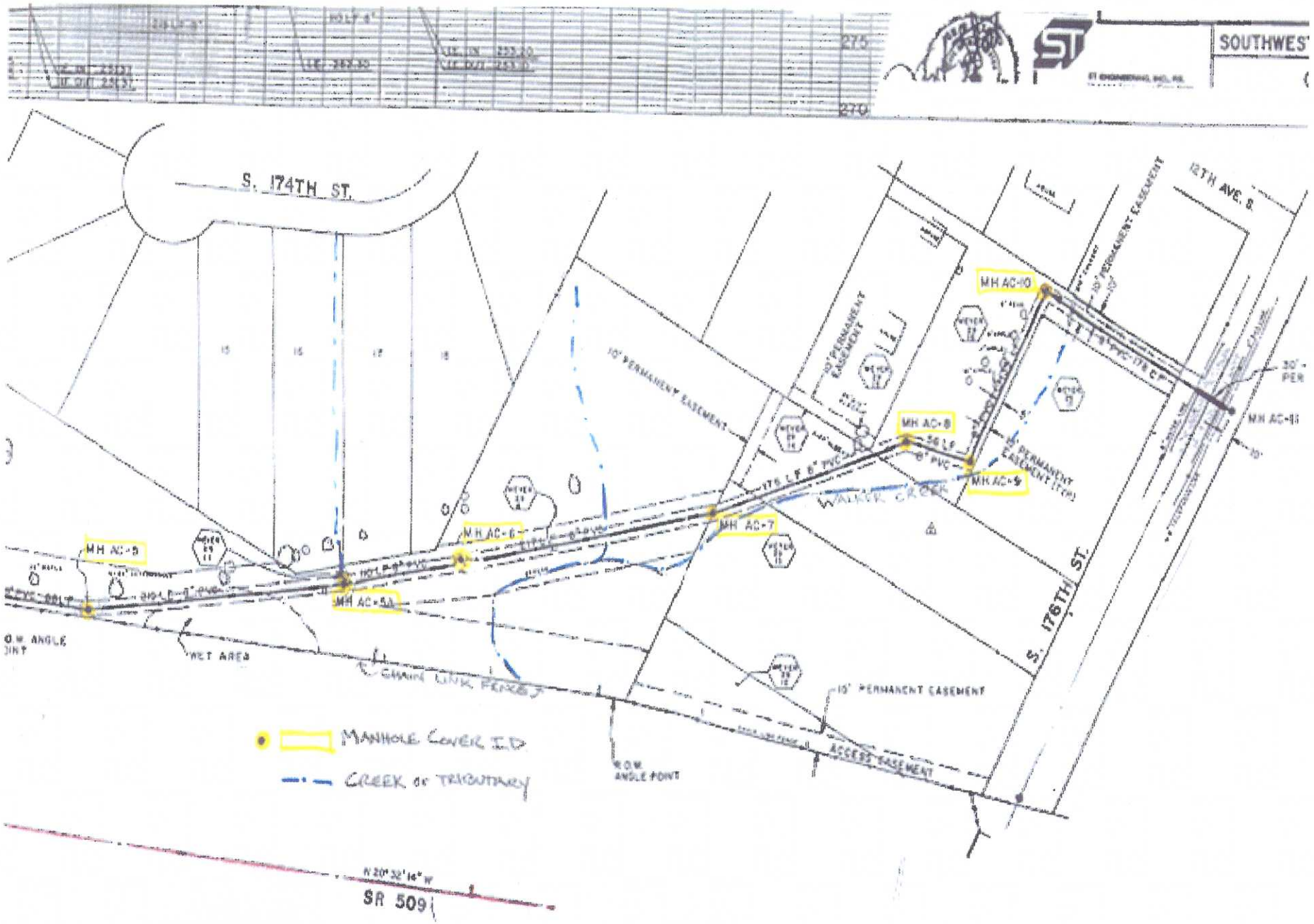

Map 1. Map of sewer line showing locations of manholes, right-of-way fence and SR509 centerline. (Scale 1"=100 feet).

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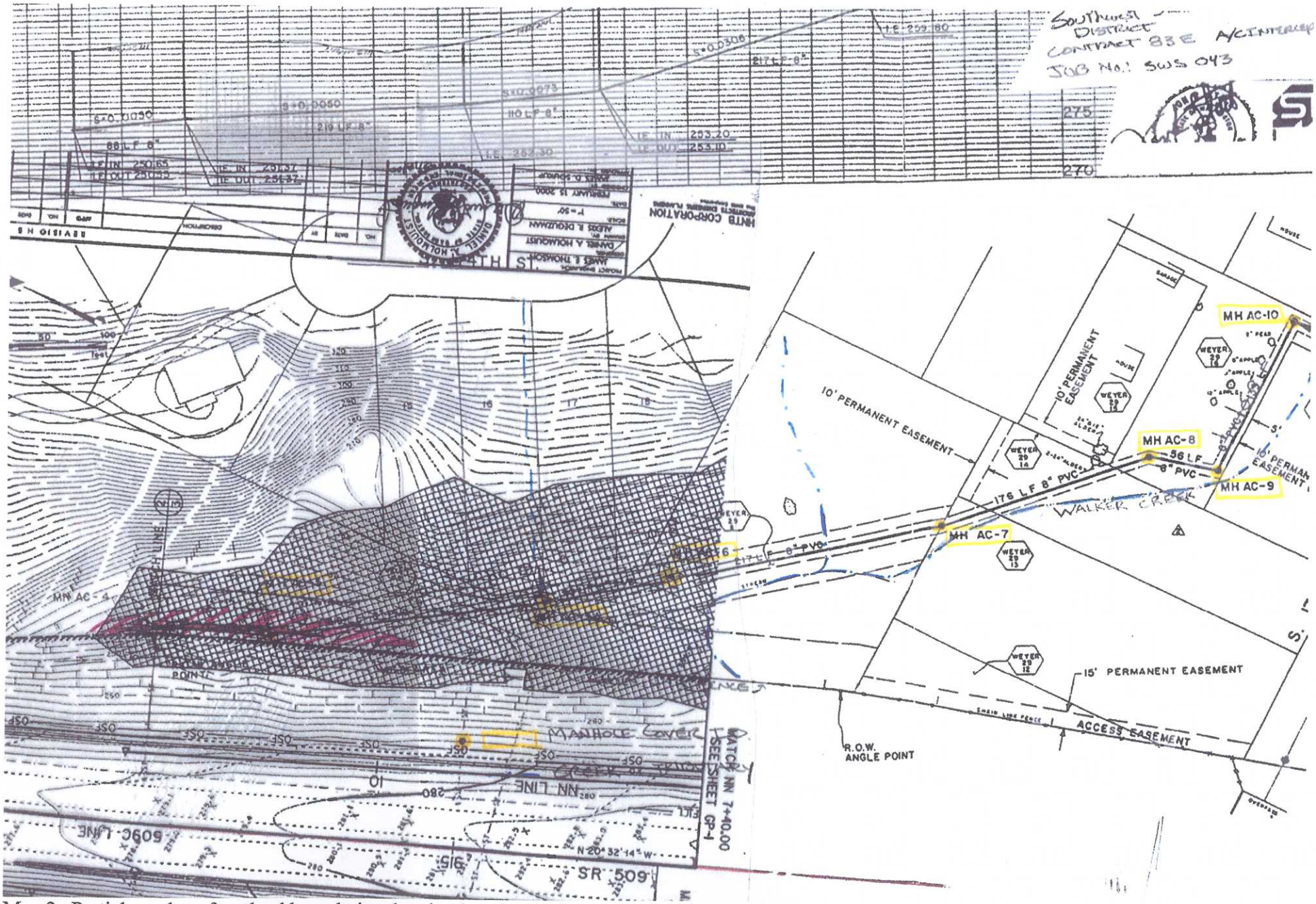

Map 2. Partial overlay of wetland boundaries showing location of depression in red. Note that the red shaded depression on map is shown east of the right-of-way fence whereas it actually lies west of the right-of-way map. (Scale 1"=100 feet).

above applicable water-quality criteria. If chemical or microbiological decay is considered, and given the long time frame for discharge to occur, it is highly unlikely that petroleum hydrocarbons from the historic fill sources will be found in discharge from the embankment fill.

Section 6.0
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