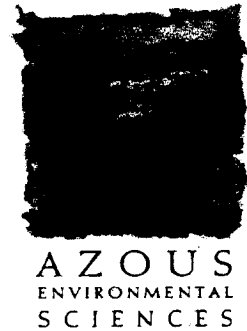


May 14, 2001

Ms. Muffy Walker
US Army Corps of Engineers
Regulatory Section, Seattle District
PO Box 3755
Seattle, WA 98124-2255



and

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

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

Dear Ms. Walker and Ms. Terzi,

As you know, I am an independent wetland scientist engaged by the Airport Communities Coalition ("ACC) to review matters relating to the Port of Seattle's proposed Third Runway project, including the SR 509 Temporary Interchange. In the process of reviewing documents and on-going correspondence regarding the Temporary Interchange at SR509 and S. 176th Street, I have been monitoring changes in conditions to the extent possible from materials received through public disclosure requests. Several changes to the temporary interchange project have been made. There remains, however, a nagging and potentially serious problem regarding the actual and mapped position of SR509 in relation to Wetland 44a. In addition, there is continuing concern about how construction of the temporary interchange can occur without sedimentary discharges to wetlands, given the close proximity of wetlands 44 and 43 to the proposed ramps.

Attached to this letter is a report submitted on June 5, 2000 regarding the discrepancy between the topography shown on the engineering drawings for SR509 by HNTB and what actually exists on the east side of SR509. It is possible that the Corps has received an explanation for this discrepancy that I am not aware of. However, unless addressed, the consequences of the error could have a significant adverse effect on wetland 44a. The magnitude of this error, depending on its explanation, could mean Wetland 44a is located within or significantly closer to the construction zone than what is shown in the project's documentation. This condition could result in filling or unacceptable sedimentary discharges to Wetland 44a.

If you examine sheet D2 of the Drainage Plans for the Temporary Interchange you will notice a depression located at about 242 foot contour and situated east of SR509 within Wetland 44a. The depression is shown to be located outside the fence delineating the right of way belonging to SR509. However if you were to actually stand within that depression in its real location, you would be west of the fence marking the right of way. This means that some combination of the topography, the wetland boundary, the right of way or the location of SR509

is incorrectly displayed. If the wetland is located correctly on the topography, the possibility exists that the wetland is actually significantly closer to the construction than shown in the permit request documents. This should be known in advance of the permit's approval as it could result in additional compromises to the buffer for Wetland 44a, the possibility of water quality violations due to sedimentary discharges or, worst case, actual filling of the wetland.

Similar to Wetland 43 west of SR509, 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 in the June 5th 2000 report that two small seasonal creeks were observed flowing west to Walker Creek, which flows from south to north through Wetland 44a, then west under SR509 to Wetland 43.

My concern remains about how construction of the temporary interchange will occur without sedimentary discharges to the adjacent wetlands given the close proximity of the wetlands to the proposed ramps. I understand that measures have been promised to prevent sediment discharges during construction on the fill prism on both sides of SR509. But clearly, there is very little buffer for errors under these steep slope conditions. Further, the reality of what happens during construction activities is often different from the version presented in the planning stages, especially in situations such as here, where we know the wetland boundary lies as close as 12 feet of the wall line of the ramp located on the east side, and may be closer when the plans are corrected to represent actual field topography.

Finally, in the June 13th 2000 memorandum for the record from the Corps to the Port of Seattle, and the accompanying August 24, 2000 Corps letter to the Port, the Corps states that the Temporary Interchange project does not have a utility other than the construction of the Third Runway and therefore advises that the Port cannot proceed with the temporary interchange until a decision has been made on the entire Third Runway project. The possibility of a new plan to avoid direct impact to wetlands is mentioned, with the requirement for submission of such a revised plan by the Port to the Corps. I assume that these requirements are still in effect and that you will be required to submit corrected plans from the Port. As you are aware, Wetlands 44 and 43 are headwater areas to Walker and Des Moines Creek and will likely be adversely impacted should there be inadvertent filling and insufficiently managed sediment events.

Please review the adequacy of provisions to protect against sedimentary discharges to Wetlands 43 and 44a as well as verify the location of Wetland 44a and its position in relation to the topography on which the project plans for the temporary interchange are based. Clearly, the grossness of this error provides no reasonable assurance that the adjacent wetlands will be protected. Insufficient oversight of both these situations could result in significant adverse impacts to Wetlands 43 and 44a. I hope this information is helpful. Please call if you have any questions or would like to discuss these findings further.

Sincerely,



Attachments: June 5, 2000 Report, Azous Environmental Sciences

Cc: Kimberly Lockard, Airport Communities Coalition
Peter Eglick, Helsell Fetterman, LLP
Kevin Stock, Helsell Fetterman, LLP



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.

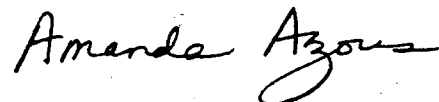
After visiting the site and reviewing the materials carefully, it is clear there is a significant discrepancy between what actual conditions are on the east side of SR509 and what is shown on sheet GP-2 Grading Plan in the project plans prepared by HNTB. Map 2 shows a portion of the GP-2 grading plan 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 than 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.

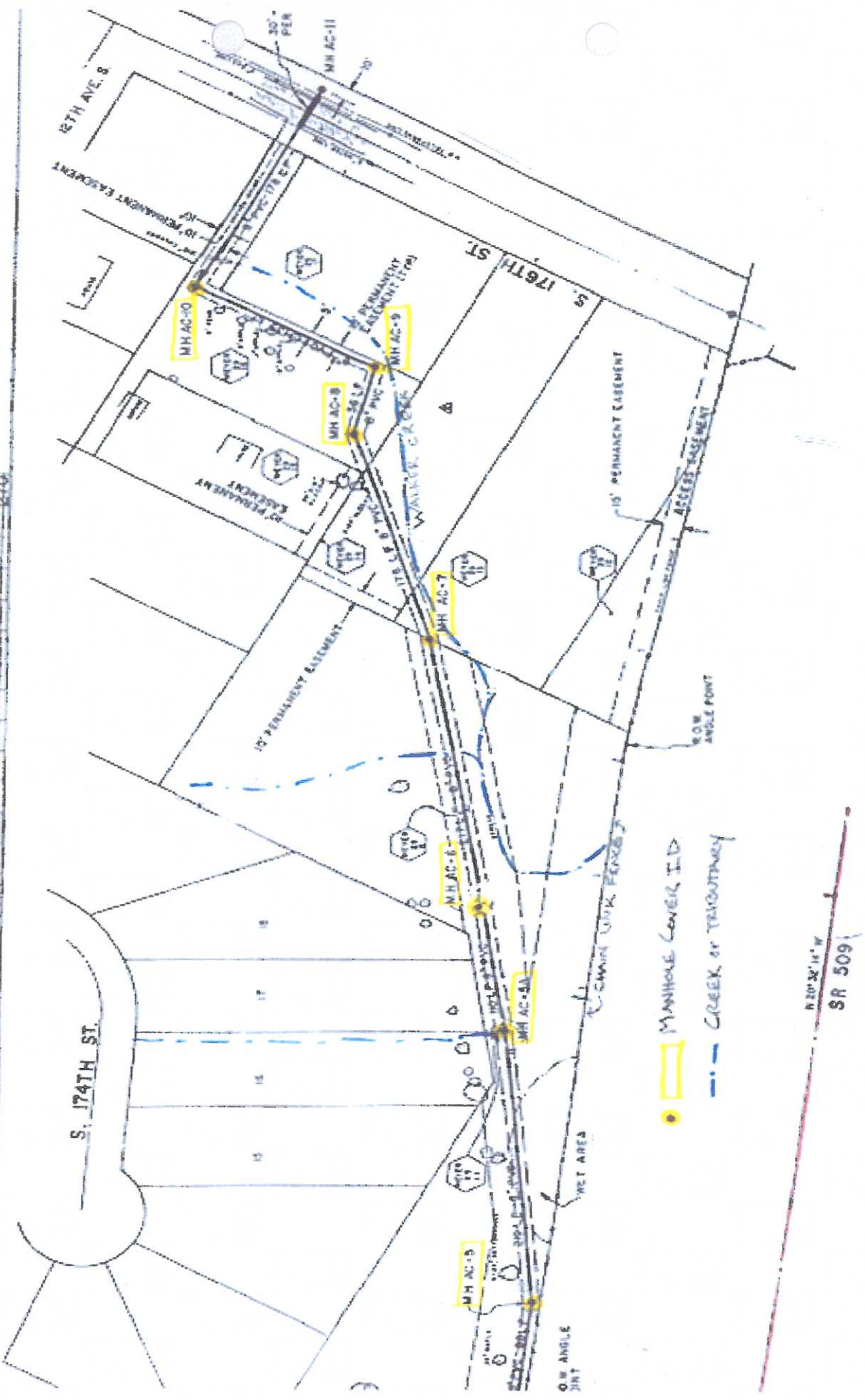
Sincerely,



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

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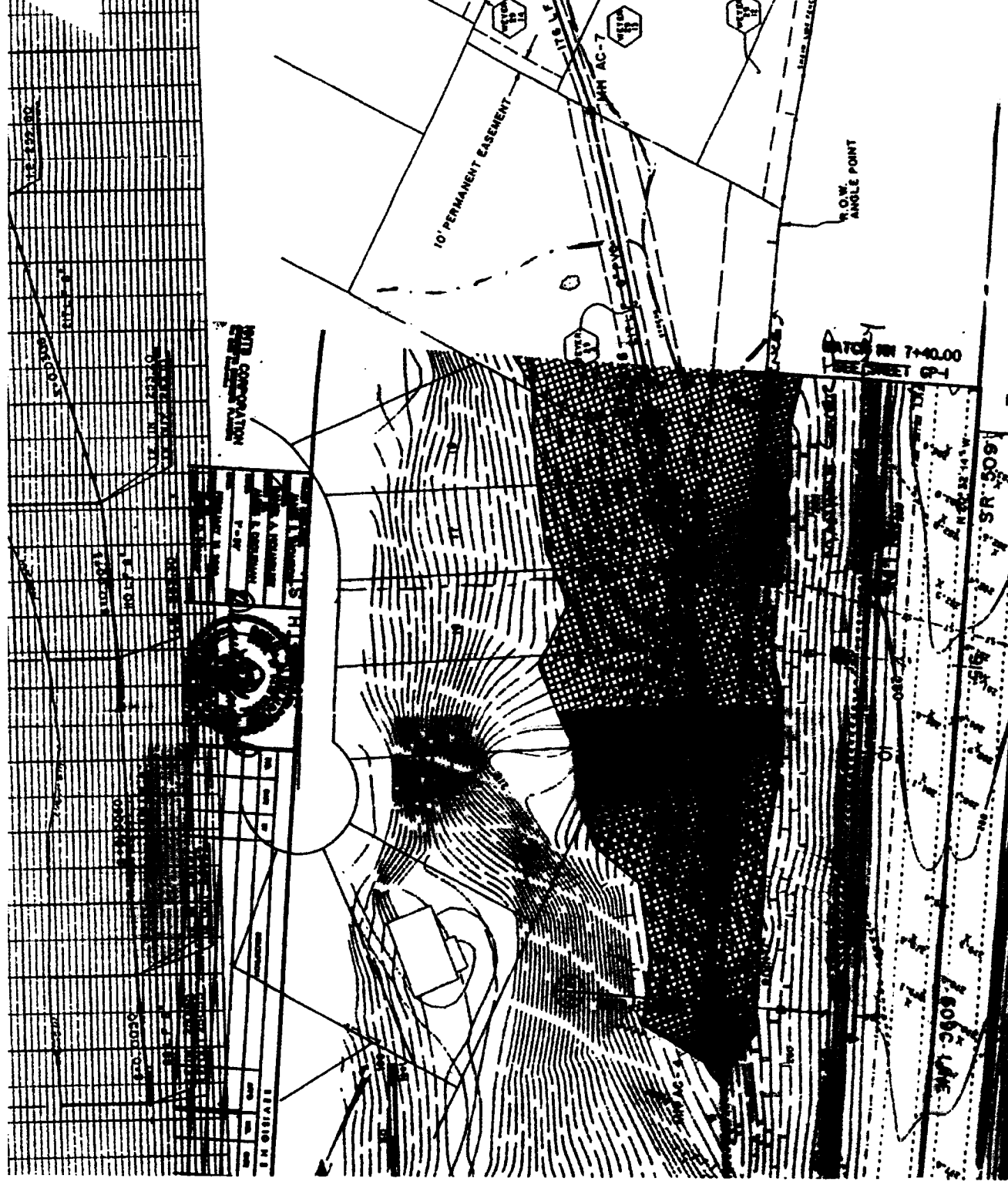
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Map 1. Map of sewer line showing locations of manholes, right-of-way fence and SR509 centerline. (Scale 1"=100 feet).

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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).

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