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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
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Seattle, Washington 98101

Reply to
ATTN of: ECO-083

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OPTIONAL FORM 99 (7-90)

FAX TRANSMITTAL

of pages = 3

Colonel James M. Rigsby
District Engineer
Seattle District, Corps of Engineers
P.O. Box C-3755
Seattle, Washington 98124-2255

To	From
Dept./Agency	Phone #
Fax #	Fax #
NSN 7540-01-317-7368 5099-101 GENERAL SERVICES ADMINISTRATION	

ATTN: Jonathan Freedman, Project Manager

RE: Public Notice 96-4-02325, Port of Seattle, December 19, 1997

*Comments on
Direct
510 page*

Dear Colonel Rigsby:

We have completed our review of the above referenced public notice which proposes to fill 7.38 acres of wetlands for the construction of a third parallel runway at Seattle-Tacoma International Airport, including filling 5.46 acres of wetlands for the proposed third runway and 1.92 acres of wetlands fill at on-site borrow sites. Also proposed is filling 2.34 acre of wetlands to construct two new Runway Safety Areas. An additional proposed fill of 1.70 acres of wetlands to construct the South Aviation Support Area (SASA) facilities for airport support and maintenance facilities. Total wetland fill per the public notice is 11.42 acres as described in the table on sheet 6 of 29. Also on sheet 6 of 29 the foot note describes a total of approximately 12.23 acres of wetlands would be filled as a result of this project. Clarification is needed to account for the direct wetland impacts associated with this project.

The proposed work would also require filling and rechanneling approximately 980 feet of Miller Creek (0.25 of an acre), about 2,280 feet (0.15 of an acre) of drainage channels in the Miller Creek basin, and about 2,200 feet (0.5 of an acre) of Des Moines Creek.

As part of EPA's review, we read the proposed "mitigation plan" provided by the applicant and dated December 18, 1996. The direct acreage impacts to waters of the U.S. is different in this document than that included in the Public Notice.

After reviewing the above referenced public notice, the Environmental Protection Agency (EPA) has the following concerns and comments:

- The public notice and "mitigation plan" fails to identify appropriate compensatory mitigation for the wetland impacts. Essentially all of the on site

impacts are proposed to be mitigated off-site in the Green River Valley Watershed near Auburn, Washington. The proposed off-site mitigation cannot mitigate for those specific lost aquatic resources in the Des Moines Creek and Miller Creek Watersheds. EPA recognizes the need for achieving safe aircraft operations by minimizing bird strikes with aircraft, but it is EPA's position that public safety and environmental protection objectives can be mutually achieved. There are a number of wetlands within the Des Moines Creek and Miller Creek watersheds that could benefit from enhancement and restoration. We believe that incorporating mitigation in the impact basins will not create additional wildlife, but simply replace the lost habitat as a direct result of project implementation. We recommend the Corps of Engineers look for on-site (in basin) aquatic resources mitigation opportunities that would provide environmental benefits. The mitigation need not be open water but other wetland habitats that could be developed demonstrating aquatic resources benefits.

The proposed project includes filling 1.70 acres of wetlands for the SASA. We believe there are opportunities for further avoidance by downsizing or changing the footprint of the SASA. Also the Corps of Engineers should evaluate other off-site existing facilities such as at Paine Field for meeting the overall project purpose for the SASA and avoiding the wetland impacts. EPA recommends the Corps conduct an independent alternatives analysis for the SASA that demonstrates the SASA is the least environmentally damaging practicable alternative per the Clean Water Act Section 404(b)(1) Guidelines.

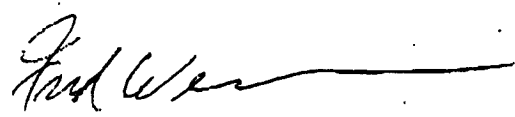
The applicant proposes to fill 1.92 acres of wetlands for on-site borrow sites. It is EPA's position that off-site borrow areas are available which would avoid the on-site impacts. EPA recommends the Corps of Engineers conduct an independent alternatives analysis for the on-site borrow areas and demonstrate that the borrow sites are the least environmentally damaging practicable alternative consistent with the 401(b)(1) Guidelines.

Based upon our concerns and comments as stated above, we can not conclude that this project complies with the Clean Water Act Section 404(b)(1) Guidelines. Accordingly, EPA recommends the permit be denied as proposed.

EPA is willing to meet with the applicant and Corps of Engineers to discuss and resolve the issues of identifying on-site mitigation in Des Moines Creek and Miller Creek Watersheds; avoiding the wetland fill at the SASA; and avoiding the wetland fill at the on-site borrow areas.

Should you have any questions or desire additional coordination concerning this project, please contact Steven Roy of my staff at (206) 553-6221.

Sincerely,



Fred Weinmann, Acting Manager
Aquatic Resources Unit

cc: Ecology
WDF&W
NMFS
USFWS
Applicant