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Department of Ecology
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Shorelands & Environmental
Assistance Program

September 15, 2000

Corrected Version

Tom Luster
Shoreline and Environmental Assistance
Washington State Department of Ecology
Post Office Box 40117
Olympia, WA 98504

Dear Mr. Luster:

King County is pleased to have the opportunity to assist the Department of Ecology by making our technical review capacity and knowledge of local stormwater conditions available for the review of the Port of Seattle's Comprehensive Stormwater Management Plan (SMP) for Master Plan Update Improvements at SeaTac International Airport. This effort has been an excellent example of how State and local government can work cooperatively together to provide high quality service to the region.

It is important, when considering the results of our review, to keep in mind the limitations of the work that we have performed. First, this review is limited to ascertaining whether the SMP attained minimum compliance with the 1998 King County Surface Water Design Manual. Compliance with the technical provisions of the Design Manual does not mitigate all potential impacts of development and may not provide sufficient information to allow for approval under other codes and regulations. Compliance with the Design Manual is, however, a good start towards mitigating the impacts of this large and complex project.

It is also important to remember that this review is limited to those development activities identified by the Port of Seattle as being Master Plan Update Improvements. While other projects of varying magnitude are being proposed for this area, only those projects included in the formal SMP submission were reviewed for this comment letter. No assumption of concurrence with the technical details or effectiveness of additional projects should be assumed without our specific written comment.

This letter summarizes the general comments of our review (Enclosure 1) and provides specific detailed comments on the SMP (Enclosure 2). In general, the report indicates that it is possible to engineer a stormwater management system that would substantially mitigate the impacts of the proposed Master Plan Update developments. The reviewers found no information indicating

AR 026129

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that the report contained "fatal flaws" in its conceptual strategy for demonstrating feasibility of complying with the County's stormwater standards. There are, however, a number of inconsistencies within the document and between the main document and its appendices that make the use of the August 2000 iteration of the document for final permitting decisions difficult. Additional attention to details and internal consistency would eliminate this concern.

Water Quality

The August, 2000 draft of the SMP demonstrates the feasibility of implementing water quality facilities and source control Best Management Practices (BMPs) consistent with the basic water quality treatment requirements of the 1998 King County Surface Water Design Manual with a few exceptions. Please see specific water quality comments in enclosures.

Flow Control

The flow control portions of the SMP are much improved over the earlier draft, and significant strides have been made in rectifying problems identified in the 11/99 draft. In particular, problems with hydrologic models for the three stream systems affected have been largely eliminated. There are, however, a number of remaining inconsistencies between the needed storage volumes identified in the SMP's analytical appendices and the specific mitigation measures proposed in the SMP itself. Generally these inconsistencies err on the side of under mitigating impacts, although examples of over mitigation are also to be found in the SMP.

Erosion and Sediment Control

Effective erosion and sediment control during construction must be maintained during all aspects of the construction of the Master Plan updates if stream and wetland protection efforts are to be successful. This is a very large and complex project with numerous phases, and will be implemented over a number of years. Sediment control facilities and fill embankments are proposed adjacent to numerous wetlands and streams. If these proposed facilities are not effective, or fail during storm events, the potential for adverse downstream impacts is significant. Ongoing and diligent attention to erosion and sediment control efforts during implementation is critical.

Verification Suggested

This is a very large and complex set of proposed actions, covering a large physical area and spanning a number of years during implementation. The SMP includes many contingencies that may alter what is needed to meet flow control and water quality protection goals. We recommend that Ecology and the Port develop a joint compliance team to ensure that decisions affecting contingencies are made in a consistent manner, that mitigation measures provided are working properly, and that downstream properties and natural resources are effectively protected.

Tom Luster
September 15, 2000
Page 3

Thank you for this opportunity to work together. Should you have specific questions regarding our detailed comments please contact Kelly Whiting (206-296-8327) or David Masters (206 296-1982) directly.

Sincerely,



Pam Bissonnette

PB:pra16

Enclosures

cc: Ray Helwig, Northwest Regional Director, Washington State Department of Ecology
Ron Sims, King County Executive
Paul Tanaka, Deputy King County Executive
Tim Ceis, Chief of Staff, King County Executive Office
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AR 026131