



United States Department of the Interior

FISH AND WILDLIFE SERVICE
Western Washington Fish and Wildlife Office
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1 Union Square
600 University Street, Suite 3600
Seattle, Washington 98101-3197

Subject: Monitoring Plan for Embankment Fill Seepage, Master Plan Update Endangered Species Act Consultation (1-3-00-F-1420)

Dear Mr. Lynch:

Thank you for your letter and monitoring plan dated August 10, 2001. I apologize for the delay in responding to you with our comments on the plan. Our comments and questions are as follows:

1. Pg. 1, 1.0 Introduction and Background, first paragraph: The monitoring plan should address both seepage quality and quantity. Currently, the monitoring plan only addresses seepage quality.
2. Pg. 1, 1.0 Introduction and Background, second paragraph: The plan proposes to begin monitoring the quality of seepage following completion of the entire embankment. Monitoring of the seepage should begin when the first seepage occurs, which may be prior to completion of the embankment.
3. Pg. 2, 3.0 Tiered Location Monitoring Strategy: Groundwater may be a pathway by which contaminated water from the embankment may enter the aquatic environment. Are any ground water wells proposed for use in monitoring? If not, explain why.
4. Pg. 2, 3.0 Tiered Location Monitoring Strategy, Tier 1: Should seepage water exceed the criteria established in the Biological Opinion for this project, measures to collect, treat and/or dispose of the seepage may be required.
5. Pg. 2, 3.0 Tiered Location Monitoring Strategy, Tier 2, first sentence: Delete "over time".


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16. Pg. 5, 8.0 Sampling Methods: Why are only seeps with flow rates in excess of 0.5 liters per minute to be sampled?
17. Pg. 5, 9.0 Sample Analysis Methods: Please ensure that any analytical methods utilized in the monitoring program have appropriate detection limits (i.e., low enough) to enable interpretation of results against the appropriate toxicological standards or thresholds of concern.
18. Pg. 6, 11.0 Reporting: Any exceedances shall be reported to us as soon as they have been determined.
19. Pg. 6, 11.0 Reporting, second paragraph: If modifications to the monitoring plan are proposed, the Port must obtain our approval prior to initiating any revisions.
20. Pg. 6, 11.0 Reporting, second paragraph, last sentence: The Federal Aviation Administration, rather than the Port, would be responsible for reinitiating consultation with us.

If you have any questions regarding our comments, please contact Nancy Brennan-Dubbs, of my staff, at (360) 753-5835.

Sincerely,



Ken S. Berg, Manager
Western Washington Fish and Wildlife Office

c: NMFS, Lacey (S. Landino)
DOE, Bellevue (A. Kelly)