APPENDIX C
ENVIRONMENTAL REVIEW
AGENCY RESPONSES
Regulatory Branch

Bucher, Willis & Ratliff Corporation
ATTN: Mr. Michael A. Waller
7920 Ward Parkway
Kansas City, Missouri 64114-2021

Reference: 2002-4-00948
Bowers Field Airport

Dear Mr. Waller:

I have received your letter requesting an assessment of Department of the Army (DA) permit requirements for the proposed runway and terminal expansions at Bowers Field Airport at Ellensburg in Kittitas County, Washington. Your letter and drawings did not provide me with sufficient information to determine if a DA permit will be required for this work.

Section 10 of the Rivers and Harbors Act of 1899 requires a DA permit for most work in navigable waters of the United States. There are no navigable waters in the vicinity of Bowers Field Airport.

Section 404 of the Clean Water Act normally requires a DA permit for the discharge of dredged or fill material into waters of the United States, including wetlands. The term “wetlands” means those areas that are inundated or saturated by surface or ground water at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions. The U.S. Army Corps of Engineers has the ultimate responsibility for determining whether a specific wetland area is within Section 404 jurisdiction. The term “discharge of dredged or fill material” means the addition, including the redeposition, of any material used for the primary purpose of creating dry land or of changing the elevation of a water of the United States, including wetlands.

If the proposed work includes impacts to wetlands or other waters of the United States, you should submit a permit application to this office. Thank you for your letter inquiring about permit requirements. To learn more about the U.S. Army Corps of Engineers regulatory program please visit our website at http://www.nws.usace.army.mil/index.cfm or contact Mr. Joe Brock at telephone (206)764-6905.

Sincerely,

Michael Lamprecht
Chief, Enforcement Section

RECEIVED
SEP 16 2002

Bucher, Willis & Ratliff Corporation
KANSAS CITY, MO
SEP 27 2002

Mr. Michael A. Waller  
Airport Planner  
Bucher, Willis & Ratliff Corporation  
7920 Ward Parkway  
Kansas City, Missouri 64114-2021

Re: Bowers Field Airport Master Plan Update - Environmental Review Coordination

Dear Mr. Waller:

As discussed in our conversation on September 27, 2002, EPA's general conformity requirements do not apply to the planned development at Bowers Field Airport. This proposed project would not be located in a nonattainment or maintenance area for air quality. Therefore, general conformity does not apply.

For other air quality requirements, we recommend coordinating with the Department of Ecology, Central Regional Office. If you have any further questions, please contact me at (206)553-0985.

Sincerely,

[Signature]

Debra M. Suzuki  
Environmental Engineer  
Office of Air Quality

RECEIVED  
OCT 03 2002  
BUCER, WILLLS & RATLII  
KANSAS CITY, MO
September 16, 2002

Mr. Michael Waller
Buchler, Willis Ratliff
7920 Ward Parkway
Kansas City, Missouri 64114-2021

Re: Bowers Field Airport Master Plan
Log No.: 091202-17-RD

Dear Mr. Waller:

We have reviewed the materials forwarded to our office for the proposed Bowers Field Airport Master Plan Update. Based upon this information we are of the opinion the proposed project will have no effect upon cultural properties included in the National and State Registers of Historic Places and the Washington State Archaeological and Historic Sites Inventories. Thus, no historic properties are affected.

These comments are based on the information available at the time of this review and on behalf of the State Historic Preservation Officer in compliance with the Section 106 of the National Historic Preservation Act, as amended, and its implementing regulations 36CFR800.4. Should additional information become available, our assessment may be revised, including information regarding historic properties that have not yet been identified.

We would appreciate receiving any correspondence or comments from concerned tribes or other parties that you receive as you consult under the requirements of 36CFR800.4(a)(4). In the event that archaeological or historic materials are discovered during project activities, work in the immediate vicinity should be discontinued, the area secured, and the concerned tribes and this office notified. Thank you for the opportunity to comment and a copy of these comments should be included in subsequent environmental documents.

Sincerely,

Robert G. Whitlam, Ph.D.
State Archaeologist
(360) 586-3080
e-mail: robw@acted.wa.gov
October 7, 2002

Michael A. Waller
Bucher, Willis & Ratliff
7920 Ward Parkway
Kansas City, Missouri 64114-2021

Dear Mr. Waller:

This letter is in response to your letter of September 5, 2002 and contains a list of comments on the Bowers Field Review.

The title identifying it as the “Airport Industrial Park Master Plan” should be changed to “Airport Industrial/Business Park Master Plan” to better convey the identified concept for future development at the Airport that recognizes uses more consistent with “office”, distribution and light industrial.

A word of caution is in order regarding the impacts that certain industries can have on the City sewer system. Under Chapter 9.20 of the City Code certain types of discharges are prohibited, and as a condition of sewer hook-up the City reserves the right to require analysis of the discharge material and determine if the discharge is acceptable, acceptable with certain pre-treatment conditions imposed, or not acceptable by the sewer system. While this has not been an issue to date, there are certain chemical, electronic and technical/medical industries out there that might require pre-treatment mitigation, though they would likely face the same issues in any other community as well.

The City would recommend that any expansion to the I-L uses be limited to the Airport area and not a blanket use expansion to all I-L zoned land within the County.

The City would recommend that the design guidelines be imposed in some fashion to ensure a well designed and marketable development at the Airport. The mechanism for imposing those design guidelines (zoning text change, PUD/m master plan adoption, or covenant) however, is a County decision.

The preferred alternative is consistent with both City and County Comp Plan future land use designation for the Airport area. The siting of office/public/light industrial in the South and Southwest area would help to buffer residential development that is, and will continue to occur within the City Southwest of the canal. The inclusion of a trail and green belt network is applauded as it will enhance the design and the eventual marketability of the development and it provides needed recreational opportunity for the Airport area. The City would strongly recommend that such improvements be kept as an integral component in this Master Plan and factored into the improvement cost.

A detailed wetland determination of this Airport property should be performed as part of the environmental review prior to a selection of a final Master Plan.

I hope these comments prove helpful in the process in determining the overall plans for use and development of the County Airport.

Sincerely,

[Signature]

Robert Witkowski
October 9, 2002

Michael Waller
Bucher, Willis & Ratliff Corporation
7920 Ward Parkway
Kansas City, MI 64114-2021

Dear Mr. Waller:

Thank you for the opportunity to comment the Bower Field Airport Master Plan [AIP Project No. 5-53-0027-07/BWR Job No. 2000-312]. We have reviewed the documents and have the following comments:

**Shorelands/Environmental Assistance**

More information is needed to respond to your request in a detailed manner. General management strategies that are anticipated to be used by Airport managers should be outlined for each land use type/area in the plan. For example, for the Open Space/ Grazing area, what kind of animals will be using the area, and what is the current use of the area? The National Wetland Inventory Map shows a large Palustrine Emergent Seasonally Flooded area that takes up almost all of that location. The Flooding Protection Area will be managed in what fashion? Will topography be changed in this location by addition or removal of earth? Will additional fill be required to create the additional runways?

South of Bowers Road there are also wetlands, floodways and streams. These features should be located on the review maps so that a clear picture of possible impacts from Airport expansion can be easily visualized.

The location and extent of the trail within the open space area may not be appropriate, given the wildlife habitat values of the wetlands in this area. Depending on what the functional values of the wetlands are, the location of the trail may have to change in order to protect those functions. A viewing platform or bird blind placed in the location of the lower end of the loop trail may be more appropriate. A wetland delineation and wetland functional assessment may be needed for this area before a trail is installed.

If there are impacts to wetlands, then a permit from the US Army Corps of Engineers (USACOE) may be required and Ecology would respond to the permit with a 401 certification or certification review letter. If the USACOE doesn’t assert jurisdiction, then Ecology will review the project.
under our State water quality Protection Act (90.48 RCW) and issue an Order to address mitigation requirements for wetland impacts, if appropriate.

Please contact Cathy Reed at (509) 575-2616 if you have questions about these comments or wetland issues.

Sincerely,

[Signature]

Gwen Clear
Environmental Review Coordinator
Central Regional Office
(509) 575-2012
October 15, 2002

Mr. Michael A. Waller, Airport Planner
Bucher, Willis, & Ratliff Corporation
7920 Ward Parkway
Kansas City, MO 64114-2021

RE: BOWERS FIELD AIRPORT MASTER PLAN

Dear Mr. Waller:

I was forwarded your letter for comments from the office of our Deputy Director, Mr. Frank Boteler, and would like to thank you for the opportunity to comment on the Bowers Field Airport Master Plan Update proposal forwarded to the Washington State Parks and Recreation Commission (State Parks) by your company for Environmental Review Coordination. State Parks has been working with the City of Ellensburg to insure that airport development enhances Commission intent for the Iron Horse State Park, located adjacent to Bowers Field.

Parks is pleased that the Bowers Field airport master plan reflects a trail connection to Iron Horse State Park. We believe your master plan supports the regional and state-wide importance of Iron Horse State Park, and provides needed green space for the City of Ellensburg. We look forward to working with you and the City during implementation of your master plan.

If you have any questions concerning any of these comments, feel free to call me at (360) 902-8632, or email at chris.regan@parks.wa.gov. Local questions and comments should be sent to Brian Carter, Ginkgo/Wanapum State Park Area Manager at (509) 856-2700.

Sincerely,

[Signature]
Chris Regan, Assistant Manager
Environmental Program

[Stamp]: RECEIVED
OCT 21 2002

[Stamp]: BUCHER, WILLIS & RATLIFF
CORPORATION
KANSAS CITY, MO
cc: Frank Boteler, Deputy Director
    Brian Carter, Ginkgo/Wanapum State Park Manager
    Jim Harris, Eastern Region Manager
    Bill Fraser, Eastern Region Planner
    Mark Schulz, Eastern Region Environmental Specialist
    Brian Hovis, Parks Planner
    Bill Jolly, Environmental Program Manager
September 7, 1999

Paul D. Bennett, P.E.
Kittitas County Public Works Dept.
205 West 5th Room 108
Ellensburg, WA 98926

Dear Mr. Bennett:

As you may be aware, the Washington State Department of Ecology (Ecology) has been investigating Formerly Used Defense Sites (FUDS) for the past year and now has results from those sites. A report detailing the results from investigation of your property was sent to you previously. I am writing to invite you to a meeting scheduled for October 7, 1999 at 9:00 a.m. at the Seattle District Corps of Engineers Office in Seattle. The purpose of the meeting will be to review the investigation of your property and others.

Ecology has been working in conjunction with the U.S. Army Corps of Engineers for several years to restore the air, land, and water resources of the state of Washington at FUDS. FUDS are defined as real property that was formerly owned by, leased to, possessed by, or otherwise under the operational control of the Secretary of Defense.

Ecology was not notified of environmental concerns prior to investigation of your site, rather based on investigative results from similar sites, an initial investigation was determined to be warranted. The primary objective of the investigation was to determine whether the possible presence of hazardous substances resulting from past practices by the Department of the Defense is present on site. The investigation was used to confirm or deny the No Further Action (NoFA) required determination previously made by the Seattle District Corps of Engineers.

Ecology has invited the Seattle District to pursue additional investigation of your property. The U.S. Army Corps of Engineers is the Department of Defense's executive agent for environmental restoration at FUDS under the Defense Environmental Restoration Program and as such, is required to resolve certain liability issues arising at these sites. The first step normally is to determine if contamination found at your property results from past practices when your property was under the control of the Secretary of Defense.
FUDS Meeting
September 7, 1999
Page 2

Ecology and the Seattle District both invite you to the meeting scheduled for October 7, 1999. The meeting will be in the Preston Conference Room at 9:00 a.m. I will briefly describe results from the investigation of your property and will give you an opportunity to ask questions and express any concerns you may have at that time. The Seattle District will outline their plans for further investigation of your property, including a schedule and resources available for that commitment.

Please notify me if you are able to attend this meeting by calling me at (360) 407-7244 or by email at gbarrett@ecy.wa.gov. A map with directions to the Seattle District Corps of Engineers Office is enclosed for your reference. I look forward to seeing you there.

Sincerely,

Guy Barrett
FUDS Project Manager
Toxics Cleanup Program

GB: gbj

cc: Mr. Grady May, USACE
    Mr. Dave Roden, USACE
    Mr. Peter Brooks, Ecology
October 14, 1999

Paul D Bennett
Kittitas County Public Works Dept
205 West 5th. Room 108
Ellensburg, WA 98926

Re: October 7, 1999 FUDS Meeting Minutes

Dear Mr. Bennett:

The purpose of this letter is to provide you with information from the meeting held October 7, 1999, at the Seattle District Corps of Engineers Office (Corps) concerning property owned by you, and which is considered to be a Formerly Used Defense Site (FUDS). As you are aware, your FUDS property has previously been determined to be No Further Action (NoFA) required by the Corps, but was subsequently found to have some type of soil and/or water contamination by the Washington State Department of Ecology (Ecology).

A report was sent to you by Ecology outlining the investigation of your property along with laboratory results. The October meeting was an effort to briefly go over results of eight similar investigations performed by Ecology and to have the Corps present their plans for followup investigations. What follows are brief notes from the meeting.

- The meeting began with Ecology presenting a summary of each of the nine properties which were investigated. The specific contaminants found at your property during this investigation were listed along with the highest concentration found and the corresponding state cleanup level.

- Grady May (Corps) mentioned that there is no current funding for NoFA sites.

- Questions (mostly from Mr. Nelson via phone) were asked and answered on how to interpret the risk at the site.

- Dave Roden (Corps) discussed the federal appropriations process and mentioned that funds would not be forthcoming until federal fiscal year (FFY) 2002-03 at the earliest.

- Mr. Roden and Mr. May talked more about site investigations. They estimated $75K to $150K as the cost for one site investigation and between $25 to $30K for an initial site visit. They talked about the need to prioritize where the money is spent.
FUDS Meeting
October 14, 1999
Page 2

- Ecology asked if the type of property use would drive prioritization of investigation and cleanup. The Corps representatives responded that it would not.

- Mr. Nelson raised the issue of whether he would be prohibited from using his property. Both the Corps and the state responded no.

- Mr. Rayburn (Northwest Microfilm, Inc.) asked about the Corps willingness to pump out a regulated underground storage tank that might be leaking. The Corps replied that if the owner takes action to prevent a release by pumping out the tank, the liability for any cleanup associated with a leak from this tank still resides with the Corps under certain conditions. However, the Corps will not reimburse for the cost of product and/or tank removal if such action is taken by an owner.

- The representative from the City of Bremerton asked what the schedule would be if sufficient funding were available now. The Corps responded that they could move on these sites in the spring.

At this time Ecology plans no further investigation of your property. Rather, we are relying on the Corps to initiate additional actions. The Corps stated that there are 12 programmed sites today and that the NoFA sites being discussed at this meeting will be the next 8 FUDS to be addressed after the programmed sites. As soon as federal funding becomes available, the Corps has made a commitment to followup with a personal contact and another visit to your property with your permission.

Enclosed is a copy of owner names and phone numbers of the meeting attendees for your information. If you should have questions or concerns, please call me at (360) 407-7244 or email me at GBAR461@ECY.WA.GOV.

Sincerely,

Guy Barrett, FUDS Project Manager
Toxics Cleanup Program

GB: gj
Enclosure

cc: Dave Roden, USACE
Grady May, USACE