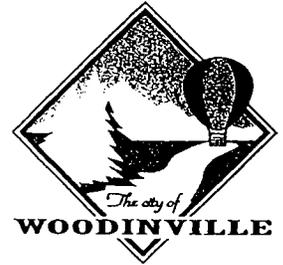


---

07 March 2006

Mr. Mark Henley  
Washington State Department of Ecology  
3190 160<sup>th</sup> Avenue SE  
Bellevue, WA 98008-5452



*"Citizens, business and local government;  
a community commitment to our future."*

**Subject: King County Brightwater Wastewater Treatment Facility (WWTF)  
Seismic Testing**

Dear Mr. Henley:

The City of Woodinville has lingering concerns over the completeness and adequacy of the seismic testing in preparation for the Brightwater wastewater treatment plant. As well, members of the community continue to express concerns over the completeness of the seismic testing.

To date, King County has been both cooperative and responsive during phases of the SEPA process when the City expressed concerns about odor control, access to the permitting process, construction and operations, traffic and risk of surface pollution. In a world where you fight for what you want in hopes of getting what you need, Woodinville has achieved generally acceptable, though not universally optimal solutions to all the above. In these areas and risk of groundwater contamination, the City's consulting engineer has found the declarations of impact and proposed mitigations to be adequate. The City of Woodinville has also signed an agreement with King County accepting its SEPA disclosures as adequate--as has Snohomish County, the current underlying jurisdiction and permitting agency for the development agreement, site development and building permits. It is through its voluntary agreement with King County for access to permitting submittals (submittals that came after the agreement accepting SEPA adequacy) that one concern is raised. It is through continued contacts from the community over not closing the final "loops" when preliminary trenching revealed the existence of South Whidbey Island fault lineaments across the Brightwater site that another concern is raised.

King County has proposed the Brightwater wastewater plant as an essential public facility that will process 36 million gallons of waste water daily at phase I buildout. It will be located just north of the City, within Woodinville's urban growth boundary. The City has continued to work cooperatively with King County but has serious concerns regarding the proposed Brightwater facility not being designed and built to the appropriate seismic requirements. The City of Woodinville is requesting the Department of Ecology take action to ensure that the site is thoroughly tested for seismic faults and that the facility is properly designed to meet supported seismic requirements.

As an essential public facility, the WWTF needs to be designed at a standard to ensure safe and uninterrupted operations under all foreseeable conditions. Operating with such high volumes of wastewater, and the toxic chemicals necessary in the treatment process, a failure of the facility during a seismic event could result in these being released, creating a health and safety hazard for both humans and the environment as well as impacts to the commerce.

King County has determined that the site does have fault lines. While testing had been performed, it has not been thorough enough to provide data to determine if there are any fault lines under the planned structures. The City asks that King County demonstrate, through further investigation, that the plant structural facilities will not be built across any active faults.

In regard to the facilities design process, the City is currently reviewing the proposed design plans. According to King County documents, the facility is being designed for a Class C soils type. A serious concern is that King County did not follow a thorough soils analysis to make this determination. In accordance with the applied building standards in the 2003 International Building Code Chapter 16, section 1615.2 Site-specific procedure for determining ground motion accelerations:

“A site-specific study shall account for the regional seismicity and geology; the expected recurrence rates and maximum magnitudes of events on known faults and source zones; the location of the site with respect to these; near source effects if any and the characteristics of subsurface site conditions.”

First paragraph, last sentence: “Where the site-specific data are not available to a depth of 100’, appropriate soil properties are permitted to be estimated by the registered design professional preparing the report based on known geological conditions.”

Second paragraph: “When the soil properties are not known in sufficient detail to determine the site class, Site Class D shall be used unless the building official determines that a Site Class E or F soil is likely to be present at the site.”

Classification of specific site characteristics and qualification into a design site/category, expects that soil logs are taken or knowledge of the site is expected to 100’ depth. Note IBC table 1615.1.1.

None of the soil borings provided in the referenced geotechnical final report, appear to be taken to 100’ depth. The Logs that we were able to review showed the shallowest boring was 16.3’ and deepest 90.3’. The average test log bored depth was 50’. Many of the bored holes had problems with collapsed sidewalls, which may indicate a lack of material stability.

There appears to be no information provided below the 50’ soil logs. These borings were conducted for construction feasibility but not deep enough to provide data to classify the design classification of the site.

Considering the critical and essential nature of this project, and the fact that the main buildings are situated between two fault lines within the site and one existing building is situated over an active fault, additional boring depths to 100’ feet could provide critical information to determine the soil Class rating. *{It should be noted that Mapped seismic figures 1615[1] and 1615[2] qualify the Puget Sound region generally in a D2 classification for all land surfaces. To use another classification needs to be proven through physical analysis which is lacking for this site.}*

No mention is made of lineament GA, which if determined to be a fault and is active could interact at the approximate center of the existing stock pot soup building, which will be retained as a plant facility. The City continues to receive community-based input that individual and group concerns could have been better addressed through thorough trenching, with geo-technical and seismic analysis of the results. King County has gone the extra mile to address many City of Woodinville concerns. We hope that it will do so on these remaining seismic issues, or that the remaining permitting agencies will assure they do.

Based on the non-conclusive information on the site fault locations and incomplete performance of soil classification determination, the City is requesting that actions be taken to stop further design work on this project until a thorough analysis has been performed to address these critical pieces of information. As this is outside of the jurisdiction of the City of Woodinville, the City is seeking support from the regulating agencies to ensure that this matter is properly addressed.

While it is hoped that the area never sees a seismic event of such large magnitude that could impact this WWTP facility, there is too much at risk not to design and construct this plant to the appropriate design standards as warranted by the existing site conditions.

Sincerely,



Cathy VonWald, Mayor

cc: Craig Ladiser, Snohomish County Planning & Development Services Director  
Christie True, King County Wastewater Treatment Division

ORIGINALS

STATE

Mr. Mark Henley  
Washington State Department of Ecology  
3190 160<sup>th</sup> Avenue SE  
Bellevue, WA 98008-5452

cc's: Mr. Craig Ladiser  
Snohomish County  
Planning & Development Services  
5<sup>th</sup> Floor, Administration Building  
3000 Rockefeller Avenue  
Everett, WA 98201-4046

Ms. Christie True, Manager  
Major Capital Improvement Program  
King County Wastewater Treatment Division  
201 South Jackson Street, Suite 500  
Seattle, WA 98104-3855

KING COUNTY

Mr. Don Theiler, Division Director  
KC Dept of Natural Resources & Parks  
Wastewater Treatment Division  
201 South Jackson Street, Suite 500  
Seattle, WA 98104-3855

Mr. Mark Isaacson, Division Director  
KC Dept of Natural Resources & Parks  
Water & Land Resources Division  
201 South Jackson Street, Suite 600  
Seattle, WA 98104-3855

Mr. Stan Hummel, Program Manager  
King County Wastewater Treatment Division  
BWO-NR-0100, 22509 State Route 9  
Woodinville, WA 98072-6010

SNOHOMISH COUNTY

Mr. Randy Sleight  
Chief Engineering Officer  
Snohomish County  
3000 Rockefeller Avenue, MS/604  
Everett, WA 98201-4046