



May 30, 2019

Adam Smee, City Administrator
City of Kalama
195 N First Street
Kalama, WA 98625

Shoreline permit extension memorandum for Haydu Park Ballfield Expansion Kalama, WA

Dear Adam,

Ecological Land Services, Inc (ELS) has prepared this letter requesting a one-year extension of the Haydu Park Shoreline Permit on behalf of the Port of Kalama. Permit extensions of no more than one year are allowed according to Washington Administrative Code (WAC) 173-27-090(3) based on reasonable factors, and as long as the request for an extension is filed before the expiration date of the permit and notice of the proposed extension is given to the parties of record on the shoreline substantial development permit. A description of the proposed project and a justification of the permit extension is detailed below:

Haydu Ballfield Expansion Project

The Kalama School District is proposing to expand the southern baseball field within Haydu Park, owned by the Port of Kalama, from its current size of 265-feet (measured from the home plate to the furthest edge of the outfield) to 350-feet. This expansion will allow use of the ballfield by high school teams, which require larger outfields. This ballfield expansion will require reconfiguration of paved pedestrian paths and gravel maintenance paths around the expanded ballfield, the modification of the southeastern soccer field, and the shift and reconfiguration of the stormwater facility currently south of the existing ballfield. The southeastern corner of the expansion will extend approximately 0.21 acres into the Riparian Habitat Area (RHA) of the Kalama River, and mitigation at a 2:1 ratio is proposed for these impacts.

Permit Extension

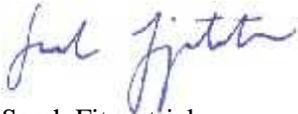
The existing Haydu Park Shoreline Permit expires August 7, 2019. To provide adequate time to obtain permits and construct the ballfield expansion, ELS requests a permit extension of one-year on behalf of the Port of Kalama, the original permit holder. It is ELS's opinion that the Haydu Ballfield Expansion project is within the "scope and intent of the original permit", as defined in Washington Administrative Code (WAC) 173-27-100(1) and (2)(a-f).

- No additional over water construction is involved for this project; in fact, no over water construction is involved at all for the ballfield expansion (per WAC 173-27-100(2)(a)).
- The ground area coverage of the ballfield expansion will be less than ten percent of the ground coverage of the park area, as the entire park is approximately 23.9 acres and the expansion is only 0.21 acres and thus requires only an increase in ground coverage of less than 1 percent (per WAC 173-27-100(2)(b)).
- The ballfield expansion will not exceed height, lot coverage, setback, or other requirements of the 1977 Cowlitz County Shoreline Management Master Program, the applicable shoreline master program for this project, as the ballfield will still be greater than the maximum setback of 50-feet from the ordinary high water mark of the Kalama River per rural district guidelines.
- The additional landscaping is consistent with the original Haydu Park permit, as a 5-foot planter strip will run along the outside of the ballfield as it does currently (per WAC 173-27-100(2)(d)).
- The land use is consistent with the use pursuant to the original permit, as the park will remain a park following the expansion (per WAC 173-27-100(2)(e)).

- While a portion of the Kalama River Riparian Habitat Area (RHA) will be impacted for the ballfield expansion, the remaining portions of the RHA will be mitigated through invasive species removal, installation of native shrubs, and installation of habitat features, resulting in no net loss of ecological function and an overall ecological lift; thus, it is ELS opinion that no net adverse environmental impact will be caused by this project expansion (per WAC 173-27-100(2)(f)).

If you have additional questions, please feel free to contact myself at sarah@eco-land.com, or call (360) 578-1371.

Sincerely,



Sarah Fitzpatrick
Biologist