



May 30, 2019

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

SEPA Addendum for the Haydu Park Ballfield Expansion Kalama, WA

Dear Adam,

Ecological Land Services, Inc (ELS) has prepared this addendum to the 2014 State Environmental Policy Act (SEPA) Checklist for Haydu Park to address a proposed ballfield expansion in the park. SEPA addendums are defined according to Washington Administrative Code (WAC) 197-11-706 as environmental documents used to provide additional information or analysis that does not substantially change the analysis of significant impacts and alternatives in the existing environmental document and may be used at any time during the SEPA process. The impacts from the proposed ballfield expansion are minor and fall within the scope of the SEPA and other permit documents prepared for the original Haydu Park project. To illustrate this, a brief description of the project is detailed below, as well as a discussion of how the ballfield expansion does not substantially change the analysis of significant impacts issued with a Determination of Mitigated Non-Significance (DMNS) issued with the original Haydu Park permit.

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 to 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 0.30 acres into the Riparian Habitat Area (RHA) of the Kalama River, and mitigation at a 2:1 ratio is proposed for these impacts for an overall ecological lift post project construction. Construction is anticipated to begin July 2019 and conclude September 2019.

Discussion of Project's Relation to Original Permit

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)).

Discussion of Non-Substantial Changes to SEPA Checklist

The SEPA Checklist evaluates sixteen environmental elements: Earth, Air, Water, Plants, Animals, Energy and Natural Resources, Environmental Health, Land and Shoreline Use, Housing, Aesthetics, Light and Glare, Recreation, Historic and Cultural Preservation, Transportation, Public Services, and Utilities. Of these sixteen elements, the proposed ballfield expansion will minorly affect the Earth, Water, Plants, and Recreation elements of the checklist; however, the proposed project will not substantially change the analysis of the DMNS issued with the original Haydu Park permit. A discussion of the affected elements follows, as well as a justification for how they do not substantially change the analysis.

Earth

The project proposes 0.30 acres of grading outside of the existing Haydu Park footprint and within the RHA of the Kalama River for the ballfield expansion. As the entire park is approximately 23.9 acres and this expansion is only 0.30 acres, the overall increase in ground coverage by recreational use increases by less than one percent. Additionally, impacts in this area will be mitigated at a 2:1 ratio for an overall ecological lift post project construction and all bare areas will be revegetated. In this way, this relatively minor amount of grading associated with the ballfield expansion is not a substantive change and does not affect the DMNS associated with the original permit.

Water

The proposed project will encroach approximately 0.30 acres into the RHA of the Kalama River, and thus proposes work adjacent to a surface water body. The ballfield expansion will also occur within the 100-year floodplain of the Kalama River and a portion will occur within the floodway. However, the proposed ballfield expansion will not require in-water work and mitigation at a 2:1 ratio is proposed for RHA impacts between the area of impact and the Kalama River for an overall ecological lift post construction. While construction will occur within the 100-year floodplain and a portion will occur within the floodway, the proposed work consists entirely of cut and no fill. Additionally, the original

Haydu Park project proposed impacts within this portion of the RHA; thus, the effect of impacts to this portion of the RHA have previously been evaluated and permitted. A reconfigured stormwater facility is also proposed for this project and will infiltrate surface water flows. As the minor amount of impact occurring near a surface water body is being mitigated, impacts in this portion of the RHA have already been evaluated and permitted, and proposed stormwater is being amended to compensate for the ballfield expansion, the proposed ballfield expansion does not affect the DMNS issued with the original permit.

Plants

The proposed ballfield expansion will require the removal of approximately 0.30 acres of native and non-native forested and scrub-shrub vegetation in the RHA. However, no rare or endangered plant species occur within the impact area and the proposed impact will be mitigated at a 2:1 ratio and includes installation of native willows. A five-foot planting strip will also be established around the outside of the ballfield. In this way, the removal of vegetation and the compensatory mitigation for this removal does not affect the DMNS issued with the original permit.

Recreation

The proposed ballfield expansion will displace recreational use temporarily for the southern ballfield (the ballfield proposed for expansion) during construction of the expansion. As this is a temporary displacement, it does not cause a substantial affect to the DMNS issued with the original permit.

Conclusion

Per the description and the discussion of the proposed Haydu Park ballfield expansion and how the project is within the scope and intent of the original Haydu Park permit, it is ELS opinion that the project does not constitute a substantial change to the original Haydu Park permit and its associated environmental documents. Any minimal changes from the proposed ballfield expansion to the 2014 SEPA Checklist prepared for the original Haydu Park project have been addressed in the section titled "Discussion of Non-Substantial Changes to SEPA Checklist" and do not cause a substantial effect to the DMNS issued with the original permit.

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