



City of Kalama

Incorporated 1890



Staff Report and Recommendation

Date: January 11, 2017
To: Kalama City Council
From: Mark Person, City Planner
Re: Port of Kalama -
Shoreline Substantial Development Permit

Proposal

The Port of Kalama proposes reconstructing a parking lot, adjacent roadway, and pedestrian trail, which serve the marina and a professional office building. The project is located within 200 feet of the Columbia River, and therefore requires a Substantial Shoreline Development Permit.

Project Location

The site is located at approximately 110 W Marine Drive in Kalama, Washington. The site is located within Section 18, Township 6 North; Range 1 West of the Willamette Meridian. The site lies east of the W Marine Drive and west of N Hendrickson Drive. The project site is within and adjacent to parcel number 412640100.

City Council Action Required: Yes

Possible Actions:

1. **Approve** the request for a Shoreline Substantial Development Permit.
2. **Deny** the request for a Substantial Shoreline Substantial Development Permit.
3. **Continue** to a future date to obtain additional information or to consider information presented. The next available meeting date is February 1, 2017, beginning at 7:00 p.m.

Staff Recommendation

Approve the Shoreline Management Shoreline Substantial Development Permit, with conditions provided in the Recommendation section (pages 12-13) of this staff report.

Overview

To perform routine maintenance and enhance safety, ADA accessibility, aesthetics, and overall attractiveness of the existing 1970s era marina, improvements are being proposed by the Port of Kalama to replace existing abutments, gangways, floats, fuel dock, and piles and construct a sewer pump-out float and new visitors' floats. Under the existing floating moorage houses, repairs on floats and the timber roof structure are also proposed. Additionally, upgraded or new potable water service, fire suppression systems, and electrical service will be provided to existing and new floats.

Specifically, the project includes the following improvements:

Vicinity of Existing Boat Ramp (North)

- Remove existing concrete abutment and 920 square feet (SF) of concrete floats, salvage two (2) steel piles, replace in-kind with new concrete abutment, and replace with aluminum-grated floats
- Remove existing abutment/gangway and 1,360 SF of concrete fuel dock and floats, salvage eight (8) steel piles, replace in-kind with new concrete abutment, and replace with aluminum-grated gangway, monolithic concrete dock float, and aluminum-grated access float
- Reestablish fuel dispenser and service lines to new fuel dock float
- Upgrade potable water service and pedestals with freeze protection
- Upgrade fire suppression system to dry fire line with upland fire department connections and standpipes along floats
- Upgrade electrical service to 30- and 50-amp power pedestals and dock lighting

Vicinity of Existing Marginal Floats (West and South)

- Remove existing 7,200 SF concrete marginal floats, remove eight (8) creosote timber piles, leave in-place six (6) steel piles, and replace with new aluminum-grated marginal floats
- Install new sewer pump-out float adjacent to marginal floats near central gangway and reinstall sewer pump-out equipment
- Remove existing steel gangway at south end and replace with new concrete abutment and ADA-compliant aluminum-grated gangway and gangway float south of existing location
- Upgrade potable water service and pedestals with freeze protection
- Upgrade fire suppression system to dry fire line with upland fire department connections and standpipes along floats
- Upgrade electrical service to 30- and 50-amp power pedestals and dock lighting

Vicinity of Existing Transient Floats (South)

- Install new potable water service and pedestals with freeze protection
- Install new fire suppression system of dry fire line with upland fire department connections and standpipes along floats
- Install new electrical service, 30- and 50-amp power pedestals and dock lighting

Under Existing Moorage Houses (Center)

- Repair existing concrete floats, including replacement of walers and thru-rods, repair or replacement of pile hoops, repair of concrete surfaces, and other miscellaneous repairs
- Repair timber roof structure framing as needed
- Upgrade potable water service and pedestals with freeze protection
- Upgrade fire suppression system to dry fire line with upland fire department connections and standpipes along floats
- Upgrade electrical service to 30- and 50-amp power pedestals and dock lighting

Vicinity of New Visitor Floats (East)

- Install new aluminum-grated visitor floats
- Install new concrete abutment and ADA-compliant aluminum-grated gangway
- Install new potable water service and pedestals with freeze protection
- Install new fire suppression system of dry fire line with upland fire department connections and standpipes along floats
- Install new electrical service, 30- and 50-amp power pedestals and dock lighting

A barge-mounted crane with a vibratory hammer will be used to remove and install prefabricated floats, gangways, and steel piles. A total of thirty-six (36) steel piles, ten (10) salvaged and twenty-six (26) new, will be installed below ordinary high water mark (OHWM) for the project.

These improvements will improve deteriorated and/or inadequate marina facilities and help meet the demands for temporary moorage space, as well as improving habitat function by reducing shaded areas for predatory fish species that threaten juvenile salmon.

The project is anticipated to begin early 2017, with repairs of existing slips and construction of the visitors' floats beginning as funding becomes available, and completed by 2022. Site and construction plans, project narrative, critical areas report and habitat management plan, biological evaluation, and construction best management practices are attached as Exhibits A, B, C, D, and E respectively.

Findings:

1. **Site Description:** The project is primarily located in the marina harbor, which is located at approximately RM 75.2 and separated from the main channel of the Columbia River to the west with an artificial berm. The 200' wide constructed berm is primarily flat, graveled, and asphalted, and almost completely lacks vegetation and pervious areas. The upland project site was created by the U.S. Army Corps of Engineers (USACE) from the placement of clean dredged sand materials. The embankments are armored and create the outer wall of the existing marina harbor, which is connected to the Columbia River on the north end only. The public marina, boat launch, former Port administrative building, and parking are the primary uses of the area.

2. **Zoning**: Properties within and adjacent to the project area are zoned I-1 Industrial and located within the Public and Quasi-Public Overlay. The proposed uses comply with Chapter 17.28 Kalama Municipal Code (KMC) – I-1 Industrial Use District.

3. **Parking**: The proposal does not include any modifications to the existing marina parking lot, which includes the reconstruction of a parking lot, which was reconstructed in 2015. Nor does the proposal include any modifications to the marina that will expand permanent moorage capacity. Therefore, compliance with Chapter 17.44 KMC – Parking and Sidewalk Requirements is not applicable.

4. **Comprehensive Plan**: The Comprehensive Plan designates the property as Industrial. The project proposal advances several goals and policies outlined in the Comprehensive Plan and the Parks and Recreation Plan adopted by reference, including:
 - **Environmental Goal 6**: Seek to restore natural systems and environmental functions that have been lost or degraded, when feasible.
 - **Environmental Goal 9**: Conserve and protect groundwater and maintain good quality surface water.
 - **Environmental Policy 7**: Prevent or limit the release of substances into the air, water and soil that may degrade the quality of natural resources and ensure that all such releases are in accordance with local, state and federal law.
 - **Environmental Policy 8**: Require mitigation measures in accordance with applicable regulatory standards and requirements if environmental alteration is unavoidable.
 - **Environmental Policy 9**: Give lands with high natural value and limited development potential consideration as parks, recreational areas, wildlife corridors and open space.
 - **Environmental – Critical Areas Goal 1**: Preserve or enhance critical areas with the overt intent of protecting public health, welfare and safety and providing protection to important ecological features and functions.
 - **Environmental – Critical Area Goal 2**: Protect critical wildlife habitat and preserve the integrity of important corridors from development, while minimizing unavoidable impact.
 - **Environmental – Critical Area Policy 6**: Actively enforce the city’s excavation and grading regulations to make certain that acceptable development practices and erosion control efforts are in place and functioning prior to the start of ground-disturbing activities.
 - **Land Use Goal 1**: Promote the health, safety and welfare of the residents of Kalama through the encouragement of sound growth and development of residential, commercial, industrial and recreation/open space areas.
 - **Land Use Policy 2**: Consistent with the adopted Kalama Park and Recreation Plan, enhance and support recreational facilities and encourage new residential growth to

contribute towards said development.

- Transportation Goal 2: Plan and develop a transportation system that contributes to community livability, recognizes and respects the features of the natural environment and minimizes the negative effects on adjoining land uses.
- Transportation Goal 4: Maintain, enhance and expand public access to the waterfront.
- Transportation Policy 19: Continue partnership with the Port of Kalama regarding access to riverfront and marina trail.
- Economic & Commercial – Commercial/Industrial Development Policy 8: Work with the Port of Kalama to encourage industries to preserve public access to the Columbia and Kalama river shorelines whenever possible.
- Parks, Recreation & Open Space Goal 1: Provide Kalama citizens and visitors with quality recreation opportunities.
- Parks, Recreation & Open Space Goal 7: Encourage the retention of open space and development of recreational opportunities, conserve fish and wildlife habitat, increase access to natural resource lands and water, and develop parks.
- Parks, Recreation & Open Space – Regional/Special Area Facilities Goal 1: Promote and encourage the development and use of Special Area Facilities throughout Kalama.
- Parks, Recreation & Open Space – Waterways Goal 1: To increase public access to and use of the Columbia and Kalama Rivers.
- Parks, Recreation & Open Space – Waterways Policy 3: The city will work closely with the Port of Kalama, Washington State Department of Fish and Wildlife, and other citizen volunteer groups to insure that provisions are made for special areas of water access for the region’s senior citizens and the handicapped.

5. **Shoreline Master Program (SMP) and Shoreline Management Act (SMA)**: All proposed developments in or adjacent to state shorelines must be consistent with the goals, policies, and regulations of the SMP and the SMA (RCW 90.58). A shoreline substantial development permit is required for the project because it meets the definition of substantial development and it lies within the jurisdictional area of the Columbia River, a shoreline of statewide significance. Therefore, the following review includes an analysis of the project’s consistency with the goals and policies for development along shorelines of statewide significance and the regulatory criteria in the Recreation, Roads, and Construction and Operation Regulations SMP Use categories.

Construction and Operation Regulations: All shoreline projects must be constructed in accordance with the SMP construction and operation regulations, which include:

1. No construction equipment shall enter any shoreline body of water, except as authorized under the terms of a substantial development permit.
2. Vegetation along the water shall be left in its natural condition unless the substantial development permit allows otherwise.
3. During construction, care will be taken to assure that waste material and foreign

matter are not allowed to enter the water.

4. All fuel and chemicals shall be kept, stored, handled, and used in a fashion which assures that there will be no opportunity for entry of such fuel and chemicals into the water.
5. Protection from siltation and erosion shall be provided for on all earthworks projects.
6. Land being prepared for development shall have an adequate drainage system to prevent runoff from entering water bodies.
7. Side casting of excess road building material into streams will not be permitted.
8. All construction debris such as fuel and oil containers and barrels and other miscellaneous litter shall be removed from the shoreline area. No equipment shall be abandoned within the shoreline area.
9. State and federal water quality standards for both inter-state and intra-state waters already are established. These shorelines regulations need only allude to these and other regulations already in effect. Any activities within the shorelines must, as a minimum, meet all these other regulations.

Analysis: The only construction equipment proposed to enter the water is a barge-mounted crane which will remove and install steel piles with a vibratory hammer as permitted by the terms and conditions of the Shoreline Substantial Development Permit contained herein.

There is little to no existing native vegetation on the artificial rip-rap berm, which provides no habitat function for the river or wildlife, beneath areas of the proposed gangway. Minimal vegetation will be removed to install concrete abutments for the gangways as permitted by the terms and conditions of the Shoreline Substantial Development Permit contained herein.

During construction, construction best management practices (BMPs) will be utilized to assure that waste material, fuel, chemicals, and silts and eroded earth material (associated with replacement and new concrete abutments and removal of creosote timber piles) are not allowed to enter the water. These BMPs are specified in the Basic Erosion Control Measures Memorandum, prepared by Ecological Land Services, Inc. and dated October 31, 2016, as follows:

1. "New" floats will be primarily be manufactured offsite, delivered, splashed, floated, and assembled final in place.
2. All manmade construction debris will be collected and not allowed to enter waters of the state/US.
3. Methods for containing debris during overwater demolition work may include use of tarps or shrouds. Other methods may be identified by the City, Engineer, or Contractor.
4. Land-based equipment will not be operated on the substrate below the waterline.

5. Project construction will be completed in compliance with Washington State Water Quality Standards WAC 173-201A.
6. Contractor will use vegetable-oil based hydraulic fluid for equipment working over or in the water.
7. Contractor will check equipment for leaks and other problems that could result in discharge of petroleum-based products, hydraulic fluid, or other material to the waterway.
8. Contractors conducting in-water and overwater work, including demolition, will be familiar with BMP implementation and permit conditions typical of working in the aquatic environment.
9. The contractor will have a spill containment kit, including oil-absorbent materials, onsite to be used in the event of a spill or if any oil product is observed in the water.
10. Piles will be removed using vibratory extraction to greatest extent possible. Piles which cannot be extracted will be cut below the mudline.
11. Piles will be removed slowly so as to minimize sediment disturbance and turbidity in the water column.
12. Where possible, extraction equipment will be kept out of the water to avoid “pinching” the pile below the waterline to minimize creosote release during extraction.

Additionally, the project shall conduct post-dredging sediment sampling and analysis to determine the presence of polychlorinated biphenyls (PCBs) and need for sand cover subsequently. Sand cover will be needed if the PCBs are present in the post-dredge sample at a concentration greater than the SL1 criteria (110 ppb).

Compliance with the above BMPs will be required by the terms and conditions of the Shoreline Substantial Development Permit contained herein.

Regulations 6-7 are not applicable as no land is proposed to be developed, no road-building is proposed.

Per the Port of Kalama – Marina Renovations Narrative, prepared by Ecological Land Services, Inc. and dated August 18, 2016, and as required by the terms and conditions of the Shoreline Substantial Development Permit contained herein, no construction debris or equipment will be abandoned within the shoreline area.

Compliance with state and federal water quality standards for interstate and intrastate

waters will be required by the terms and conditions of the Shoreline Substantial Development Permit contained herein.

Conclusion: Staff finds the project meets the SMP's Construction and Operation Regulations, as conditioned.

Marinas: Marinas are permitted along shorelines in the urban district, when the proposal meets the following conditions:

1. Any person proposing to undertake a marina development, construction, expansion and/or alteration, or any phase thereof which constitutes a complete project, shall apply for a permit.
2. A permit for marina development, construction, expansion and/or alteration, or any phase thereof, which constitutes a complete project, may be granted subject to the following regulations:
 - a. The latest revision "Criteria Governing the Design of...Marinas...for Protection of Fish and Shellfish Resources" adopted by the Washington State Department of Fisheries in 1971, which criteria are incorporated herein by reference, and are to be adjusted to local tidal levels.
 - b. Parking facilities shall be set back from the ordinary high water mark at its location following marina development by a minimum of twenty (20) feet measured on a horizontal plane to provide public access to and viewing from the immediate shoreline area.
 - c. Sewage pump-out and treatment facilities shall be installed within two years of the establishment of U. S. Coast Guard regulations on marine sanitation devices or at the beginning of operations of any new marina or of an expansion of any "existing" marina, whichever date is latest.
 - d. Development of marinas shall comply with state and local health agencies, regulations.
 - e. A single, joint-use moorage facility shall be required of any subdivisions, motels, multifamily residences, or commercial and industrial enterprises in close proximity to each other.
 - f. Special attention shall be given to the design development of operational procedures for fuel handling and storage in order to minimize accidental spillage and provide satisfactory means for handling those spills that do occur.

Analysis: A Shoreline Substantial Development Permit application was submitted on August 24, 2016.

Regulation 2a-e does not apply, as there is no expansion of marina area, there are no alterations of existing parking facilities are proposed, there is existing sewage pump-out equipment, there are no health department concerns as living in moored boats (live-aboards) is not permitted by the Port of Kalama, and the marina is not associated with any subdivision, motel, multifamily residence, or commercial and industrial enterprise.

The proposed fuel system, including tanks, fuel lines, and fuel dispensers, will have leak

detection capabilities and automatic cut-off switches to protect the water from inadvertent fuel spills. The proposed fuel system will also meet the WA State Department of Ecology's response requirements.

Conclusion: Staff finds the project meets the SMP's Marina Regulations, as conditioned.

Recreation: Recreational uses, including trails, are permitted along shorelines in the urban district, when the proposal meets the following conditions:

1. Facilities or structures do not detract from the character of the local environment;
2. Access roads comply with regulations under the use activity Roads;
3. Parking facilities are not located within 20 feet of the shoreline as measured on a horizontal plane and surface runoff must meet all city, county, and state requirements in view of water quality;
4. There are little or no major changes of environment by man-made structures, or contrivances.

Analysis: The proposed marina facilities and structures are compatible with the character of the existing marina. The replacement structures also enhance the character of the existing marina, whose facilities have exceeded their typical design life, including severe decay on existing timber walers, surface cracks, and signs of corrosion on reinforcing steel within the float units.

Regulations 2-4 do not apply as there are no new access roads or parking facilities proposed, and minimal changes and no net loss of ecological functions will be caused by the project per analysis of consistency with criteria applicable to proposals located on Shorelines of Statewide Significance, below.

Conclusion: Staff finds the project meets the SMP's Recreation Regulations, as conditioned.

6. Shorelines of Statewide Significance: Proposals located on shorelines of statewide significance must meet six criteria listed on page 2 of the SMP and in the Revised Code of Washington (RCW 90.58.020), as follows:

- a. *Recognize and protect statewide interest over local interest.*

Analysis: State and local jurisdictions have an interest in maintaining public health, safety, and welfare, maintaining public access to rivers of statewide significance, and preserving aquatic and riparian resources. To advance the state and local jurisdiction's mutual goals, the City of Kalama has adopted the Cowlitz County SMP to regulate shoreline use, activities, and development consistent with the State of Washington's Shoreline Management Act, which recognizes and protects statewide interest over local interest. The project is consistent with the SMP's use-specific regulations and general goals per the analysis provided above and below, respectively.

Conclusion: Staff finds the project meets Criterion #6.a, as conditioned.

b. *Preserve the natural character of the shoreline.*

Analysis: The shoreline within the project scope has been previously disturbed with the construction of the marina and associated marina berm. The artificial rip-rap berm provides no habitat function, contains no native vegetation, and will have minimal vegetation removed for proposed gangway abutments. Per the analysis for consistency with Criterion #6.d below, no net loss of ecological function is anticipated from the project. Project-specific construction BMPs, as conditioned herein, and the City's erosion and sedimentation control regulations will also protect the shoreline from further disturbance during construction.

Conclusion: Staff finds the project meets Criterion #6.b, as conditioned.

c. *Address uses that result in long-term benefit.*

Analysis: The project, through consistency with the SMP and as conditioned herein, provides the following long-term benefits: enhanced safety and environmental protection by replacing and upgrading deteriorated floats, fuel dock, and utilities that have exceeded their typical design life, ADA accessibility, additional temporary moorage to meet projected demand, enhanced overall attractiveness of the marina, and enhanced access to public shorelines on the Columbia River.

Conclusion: Staff finds the project meets Criterion #6.c, as conditioned.

d. *Protect the resources and ecology of the shoreline.*

Analysis: While short-term impacts are anticipated, natural resources and ecology of the shoreline will not be adversely impacted in the long-term.

Short-term impacts include potential release of contaminants during construction. Per the analysis with consistency for Construction and Operation Regulations of the SMP above, project-specific construction BMPs, as conditioned herein, the City's erosion and sedimentation control regulations, and post-dredging PCB-testing will be utilized during construction to prevent waste material, fuel, chemicals, and silts and eroded earth material from entering the water. Short-term impacts anticipated also include noise impacts associated from vibratory pile driving used to remove and install piles. The elevated noise levels are not anticipated to exceed injury thresholds for known fish species in the vicinity and are anticipated to last 25 days only. The elevated noise levels will not therefore permanently cause migratory obstruction through behavioral changes or permanently adversely impact fish species.

Long-term impacts include the increased potential for release of contaminants from vessels due to the increased availability of temporary moorage. The potential for release of contaminants from vessels, however, is minimized by continued adherence

to the Port of Kalama's operations and maintenance programs and standards. In the context of the marina's location and size relative to the entire lower Columbia River waterbody, adverse impacts to essential fish habitat is not anticipated. Long-term impacts also include additional shading from temporarily moored vessels, floats, gangways, and pilings, which increases the potential for predatory fish species that threaten juvenile salmon.

That being said, existing 8,025 SF of concrete floats and gangways will be replaced with grated aluminum floats and gangways, and all 6,490 SF of new floats and gangways will be grated aluminum. Additionally, the marina's offset location and size relative to the Columbia River reduces impacts to insignificant levels. Between the grated aluminum floats and gangways proposed, the Biological Evaluation prepared by Ecological Land Services, Inc. and dated August 18, 2016, and preliminary feedback from the National Marine Fisheries Service (NMFS) and Washington State Department of Fish and Wildlife (WDFW), this project self-mitigates the short-term and long-term impacts described above.

Conclusion: Staff finds the project meets Criterion #6.d, as conditioned.

e. *Increase public access to publicly owned shoreline areas.*

Analysis: The existing marina is publicly owned and provides public access. By replacing and upgrading deteriorated facilities that have exceeded their typical design life, providing ADA accessibility, and adding temporary moorage to meet projected demand, the project thereby increases the appeal of the existing marina and accessibility to this portion of the Columbia River shoreline.

Conclusion: Staff finds the project meets Criterion #6.e, as conditioned.

f. *Increase the public's recreational opportunities on these shorelines.*

Analysis: The existing marina is publicly owned and provides recreational opportunities on the Columbia River shoreline. These opportunities are increased per the analysis of consistency with Criterion #6.e, above.

Conclusion: Staff finds the project meets Criterion #6.f, as conditioned.

7. **Other Permits and Approvals:** Other known governmental approvals include Grading and Excavating Permit and Critical Area Permit (City of Kalama), Electrical permit (Washington State Department of Labor and Industries), Hydraulic Project Approval (WDFW), and Section 10 Permit (USACE). Additional permits or approvals may be required. It is the applicant's responsibility to ascertain the requisite permits and obtain them. Obtaining a Shoreline Substantial Development Permit does not relieve the applicant of the necessity of acquiring all requisite local, state and federal permits for this project.

8. **Critical Areas Determination:** The project includes work in areas identified as critical areas per Chapter 15.02 KMC – Critical Areas Protection. Per the Critical Areas Report and Habitat Management Plan prepared by Ecological Land Services, Inc. and dated August 18, 2016, fish and wildlife habitat conservation areas are present. No adverse impacts are anticipated as conditioned per the SEPA Mitigated Determination of Non-Significance (MDNS) issued on December 5, 2016 (Exhibit F), and per the Shoreline Substantial Development Permit as conditioned herein. Although no geologic hazard areas are identified in the Critical Areas Report and Habitat Management Plan, the slope of the existing artificial rip-rap berm exceeds 30% and per KMC 15.02.150.B.2, is considered a potential geologic hazard. Per the MDNS, a geotechnical report will need to be submitted prior to approval of any construction permit to evaluate potential impacts by the new gangways on the rip-rap berm. Additionally, the project is located in the special flood hazard area (SFHA) of the floodplain. Per KMC 15.02.140, frequently flooded critical areas are subject to the regulations of Chapter 14.16 KMC – Floodplain Management. A Floodplain Development Permit is required per Chapter 14.16 KMC. No wetland, aquifer recharge area, or other critical area has been identified.

9. **State Environmental Policy Act:** Staff issued an MDNS on December 5, 2016 (Exhibit F). The comment period ended on December 20, 2016. The Department of Ecology submitted correspondence dated December 20, 2016 (Exhibit H).

10. **Shoreline Public Notice and Comments:** Staff determined the Shoreline Substantial Development Permit application was complete on November 14, 2016, and issued a Notice of Application on November 18, 2016 (Exhibit I). Public notice of the application was posted on the property, distributed to agencies and parties of interest, and published in *The Daily News*. The comment period ended on December 20 2016.

Conclusions

The individual findings and conclusions stated above establish that this proposal either meets, or if conditioned as recommended below, will meet: 1) the standards established in the SMP; and 2) the six criteria for granting a substantial development permit on a shoreline of statewide significance. Completion of this project, if constructed as conditioned below, will therefore be consistent with the Shoreline Management Act, the SMP, and existing land uses in the project area.

Staff Recommendation

Staff recommends the Shoreline Substantial Development Permit be approved subject to the following conditions:

1. Prior to construction, final engineering plans shall be submitted for review and approval by the City. Any proposed changes or modifications to these plans and specifications,

including those required by other agencies, shall require additional regulatory review and approval by the Planning Department prior to implementation.

2. All construction must be completed in accordance with the approved plans and the City of Kalama Development Guidelines and Public Works Standards.
3. The project is within the shoreline jurisdiction and shall comply with guidelines set forth in the Cowlitz County Shoreline Master Program (SMP).
4. The project shall adhere to all conditions of the SEPA Mitigated Determination of Non-Significance (MDNS) issued on December 5, 2016 (Exhibit F).
5. The project shall adhere to all conditions of any required local, state, or federal permit.
6. No construction debris or equipment will be abandoned within the shoreline area
7. The proposed fuel system, including tanks, fuel lines, and fuel dispensers shall have leak detection capabilities and automatic cut-off switches to protect the water from inadvertent fuel spills.
8. The proposed fuel system shall meet the WA State Department of Ecology's response requirements.

List of Exhibits

- A. Site and Construction Plans
- B. Port of Kalama – Marina Renovations Narrative
- C. Critical Areas Report and Habitat Management Plan
- D. Biological Evaluation
- E. Basic Erosion Control Measures Memorandum
- F. SEPA Mitigated Determination of Non-Significance (MDNS)
- G. Notice of Application
- H. Washington State Department of Ecology Letter

cc: Adam Smee, City Administrator
Susan Junnikkala, Permit Technician
Coni McMaster, City Treasurer/Clerk
Kelly Rasmussen, Public Works Superintendent
Port of Kalama, Applicant