



November 6, 2017

City of Kalama
Attn: Adam Smee, City Administrator
195 North First Street
Kalama, Washington 98625

Re: Port of Kalama Central Port Infiltration Pond Critical Area Determination

Ecological Land Services, Inc. (ELS) prepared this letter on behalf of the Port of Kalama (Port) regarding a critical areas determination at their Central Port Infiltration Pond site. The project is located at approximately 1253 NW 3rd Street, in Kalama and includes portions of Parcels 41029 and 41118. ELS biologists met onsite with Port representatives on September 20, 2017 to observe site conditions and gather information needed for the critical areas determination.

The Central Port Infiltration Pond area consists of asphalt and gravel lots containing a variety of obsolete buildings, utility poles and a transformer, and concrete barriers from previous industrial tenants, with the Columbia River flowing north along the western boundary. Shoreline jurisdiction extends 200 feet landward of the ordinary high water mark (OHWM) of the river. Additionally, a portion of the site is within the 100-year floodplain (Figure 1). Stormwater is currently captured in lower elevations on the property and drained to a common asphalt-lined linear pond that conveys water to the Columbia River. A stormwater overflow connection to the river exists for high water events.

The primary purpose of the project is to re-direct stormwater to a new infiltration pond for 100 percent infiltration and avoid direct discharge of stormwater to the Columbia River. The goal of the project is to improve water quality from an existing industrial area. Construction is proposed to begin in early 2018 and will consist of:

- Constructing a stormwater infiltration pond with three cells (1. Primary Settling, 2. Secondary Settling, 3. Infiltration);
- Replacing three existing stormwater pump systems located throughout the project area,
- Capping two storm pipes,
- Demolishing two buildings,
- Removing three utility poles,
- Relocating a transformer,
- Removing concrete barriers and various blockades from a previous industry,
- Removing an obsolete backup pump,
- Minor filling and paving areas of low elevation on the property,
- Maintaining infiltration ponds, including vegetation and soil management, post-construction to ensure continued functionality of the system as designed.

The project will involve approximately 7,400 cubic yards of excavation and 2,500 cubic yards of fill to create the new pond and to level and fill the existing pond area. All stormwater will be pumped to the new infiltration pond, which will be located at the north end of the project area. The pond will be excavated from an area consisting of historic fill comprised of gravel and other material that is considered effectively impervious surface. Stormwater within the pond will fully infiltrate; no water will leave the site. All construction activities will occur above the OHWL of the Columbia River.

All elements of the project will occur on existing impervious surfaces which are underlain by historic fill. The area has been in heavy industrial use for decades, including log storage and handling, vehicle transport cueing, laydown, and other industrial uses, and except for the Columbia River to the west, is surrounded by ongoing heavy industrial uses. The attached photoplate shows surrounding industry, lack of established vegetation, and ponding in areas that have been disturbed by machinery. The only vegetation present is regularly maintained and consists of scattered weedy annuals and mosses capable of growing in highly disturbed conditions. The Columbia River bank is nearly vertical and is covered with large rip-rap. There are no wetlands on the project site. According to the Washington Department of Fish and Wildlife Priority Habitat and Species on the Web interactive website, there are no endangered, threatened, candidate, or sensitive species points near the project site; however, there are listed fish species in the Columbia River. A portion of the project activities will occur within the 100-year floodplain. WEST Consultants, Inc. prepared a technical memo dated October 27, 2017 and provided a No-Rise Certification stating that the stormwater improvement project will not cause a rise in the FEMA base flood elevation for the Columbia River.

We believe the proposed project is exempt from the provisions of the City's Critical Areas Protection according to Kalama Municipal Code (KMC) Chapter 15.02.070 (E). KMC Chapter 15.02.070 (E) identifies "maintenance, operation, reconstruction of existing public and private roads, streets, driveways, utilities, and existing public buildings and facilities provided that reconstruction of any such facilities does not extend outside the previously disturbed portions of the right-of-way or building lot lines" as exempt. The proposed project is a public utility located entirely on existing impervious surface underlain by fill and will not extend outside of previously disturbed areas. Furthermore, the riparian area should be considered functionally isolated as it is entirely composed of rip-rap, historic fill, existing structures, and existing impervious surfaces, providing no habitat functions. The project will not impact critical areas (including the floodplain) or listed species and will ultimately provide a net benefit to the environment improving water quality, as stormwater will no longer discharge directly into the Columbia River.

If you have questions or need additional information, please call me at (360) 578-1371 or email at steff@eco-land.com.

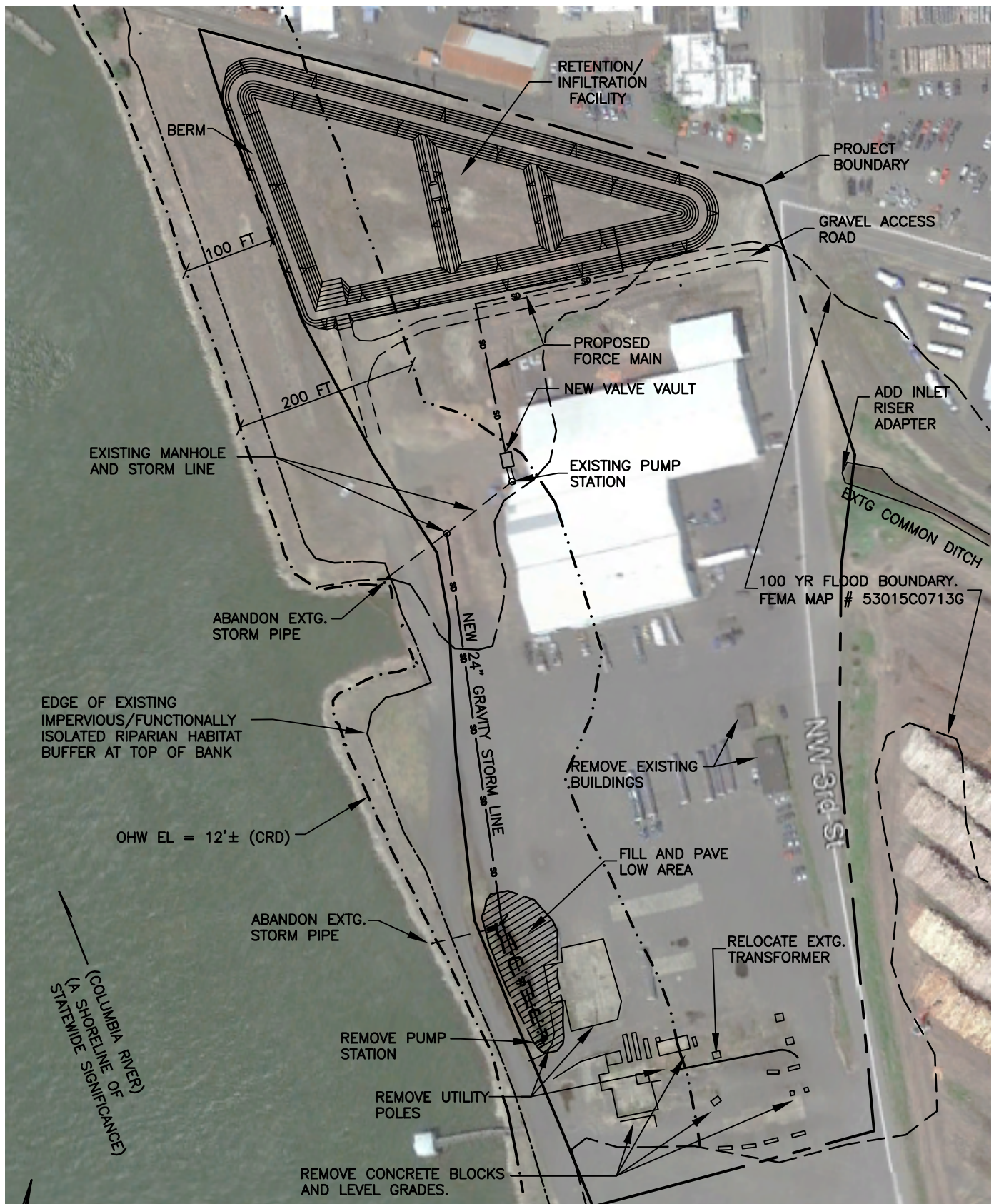
Sincerely,



Steffanie Taylor
Senior Biologist/Principal

ATTACHMENTS

Site Plan
Photoplate 1



EDGE OF EXISTING IMPERVIOUS/FUNCTIONALLY ISOLATED RIPARIAN HABITAT BUFFER AT TOP OF BANK

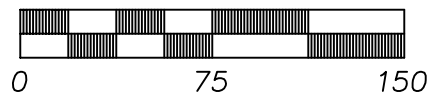
OHW EL = 12'± (CRD)

(COLUMBIA RIVER)
(A SHORELINE OF STATEWIDE SIGNIFICANCE)

- LEGEND:**
- PROJECT BOUNDARY
 - - - ORDINARY HIGH WATER
 - · - · - 200 FT SHORELINE
 - - - - 100 YR FLOOD LINE

SITE PLAN

1" = 150'



PROPERTY ADDRESS:
1253 N 3RD ST
KALAMA WA 98625
S7, T6N, R1W
PARCEL # 41029

**CENTRAL PORT
STORMWATER IMPROVEMENTS**

PORT OF KALAMA KALAMA, WA

DE CARPENTER
ENGINEERING, INC.

www.carpentereng.net

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FIGURE 1 OF 1



Storm pond area looking northeast.



Storm pond area looking east.



Picture of existing gravel fill material covering storm pond area.



Bank conditions along the Columbia River.



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DATE: 10/2/17
DWN: ST
PRJ. MGR MLM
PROJ.#: 1703.25

Photoplate 1
Port of Kalama
Central Port Storm Pond Project