CITY OF CASTLE ROCK SUBSTANTIAL SHORELINE DEVELOPMENT PERMIT APPLICATION

LANDING ON THE COWLITZ STORMWATER OUTFALL

PARCEL NO. 308120500 LANDING ON THE COWLITZ

APPLICANT:

CT6, LLC P.O. Box 1419 Battle Ground, WA 98604-1419 Contact: Ingrid Friedberg, Special Projects Manager Email: <u>ingridf@tapani.com</u> Phone: 360.907.553.9144

ENVIRONMENTAL CONSULTANT:

Ecological Land Solutions 1157 3rd Avenue, Suite 220A Longview, WA 98632 Contact: Elizabeth Vaughn, Biologist Email: <u>elizabeth@eco-land.com</u> Phone: 360.578.1371



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I. DEVELOPMENT SUMMARY INFORMATION

Property Owner &: Applicant:	CT6, LLC P.O. Box 1419				
	Battle Ground, WA 98604-1419				
	Contact: Ingrid Friedberg, Special Projects Manager				
	Email: <u>ingridf@tapani.com</u>				
	Phone: 360.553.9144				
Request:	Shoreline Substantial Development Permit Application Approval				
Anticipated					
Applications Required:	Binding Site Plan Application and Shoreline Permit Application				
Location:	The existing property is adjacent to Parcel 6143801, 3081501 and 308140200 (privately owned property outside of the Landing on the Cowlitz (LOTC) Master Plan) and Larsen Lane SW, LOTC BLA Parcel 7 (Parcel 30684), State of Washington Department of Land and Natural Resources (DNR) property, and the Cowlitz River.				
Parcel ID:	308120500 (ref. Boundary Line Adjustment (BLA) Survey Parcel No. 3, recorded on December 5, 2024, Auditor's File No. (AFN) 3762029)				
Area:	Parcel Size: 15.37 Acres (669,622 Square Feet)				
Approximate					
Grading Volumes:	It is anticipated that this proposal will require approximately 113 cubic yards (cy) of fill, 121 cy of cut, resulting in 8 cy of net cut within the shoreline jurisdiction.				
Zoning Designation:	Industrial (I)				
Landing on the Cowlitz Land Use					
Area Designation:	Recreation and Open Space				
Shoreline Environmental					
Designation (SED):	High-Intensity				

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II. PROJECT DESCRIPTION

This project involves the construction of a stormwater outfall and associated infrastructure within the shoreline buffer, shoreline jurisdiction, and the regulatory floodway and the 100-year floodplain of the Cowlitz River to facilitate a centralized discharge location for the Landing on the Cowlitz (LOTC) Master Plan. The stormwater outfall and conveyance pipes have been sized sufficiently to accommodate for the full build out of the LOTC Master Plan and have been designed to include corrugated polypropylene pipe (CPP) which range in size from shall include one (1) thirty- (30) inch to 48-inch CPP. Runoff intercepted from roadway surfaces will undergo preliminary water quality treatment through bioretention planters positioned along the roadways outside of the shoreline area. For each individual phase of the LOTC Master Plan, final treatment methodologies will be specified at the development stage integrating bioretention systems and mechanical filtration via catch basins to achieve regulatory compliance. The treated stormwater will be directed into an onsite conveyance system, channeling flows towards the outfall and facilitating discharge into the shoreline buffer of the Cowlitz River for infiltration. Additionally, an integrated infiltration strategy will be implemented at each capture point, optimizing upland infiltration and minimizing runoff volumes entering the conveyance system.

CONSTRUCTION METHODS

Stormwater infrastructure will be installed primarily through trenching for accurate pipeline placement. All onsite runoff will receive treatment though roadside bioretention rain gardens before discharge. Outfall construction will be completed with landward-based excavation, beginning at the OHWM of the Cowlitz River and moving progressively away from the river. Biodegradable jute erosion matting will be placed within the proposed restoration and enhancement area to stabilize soils prior to habitat features such as rootwads and rootwad logs are installed reducing the need for further equipment access for final planting. Construction traffic will use the existing gravel road connection to Huntington Avenue S., avoiding access from Larson Lane SW.

To construct the proposed stormwater outfall conveyance system, equipment to be used may include, but is not limited to, excavators, bull dozers, dump trucks, concrete trucks, compacting equipment, and hand tools. All staging and stockpile areas will be located outside of critical areas and buffers, and all project construction is proposed to be completed in a single phase during the dry season. All plant installation will be conducted during the appropriate planting windows as specified in this report.

The following details the general construction sequence:

- 1. All work limits will be clearly demarcated with silt fencing or construction fencing.
- 2. All appropriate best management practices (BMPs) will be installed.
- 3. Topsoil will be cleared and grubbed.
- 4. Infiltration areas will be marked to avoid heavy equipment from compacting soils and affecting infiltration.
- 5. Stormwater outfall will be graded to designed elevations.
- 6. Install signage prohibiting access to mitigation area.
- 7. Install biodegradable erosion control jute matting.
- 8. Install habitat features in shoreline jurisdiction.
- 9. Install riparian habitat and shoreline vegetation enhancement and restoration plantings.

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IMPACT AVOIDANCE AND MINIMIZATION METHODS

This proposal involves the construction of water-dependent critical infrastructure and as such avoidance is not possible. Impacts associated with the construction of the stormwater infrastructure are unavoidable even if they were to be sited elsewhere. Therefore, this proposal includes minimization measures to the greatest extent practicable the inclusion of mitigation for this proposal which is described in greater detail within the onsite mitigation section included below.

The following construction best management practices (BMPs) are recommended by the Habitat Management, Mitigation and Monitoring Plan:

- 1. Construction will occur mainly during the dry season (May-October) as feasible.
- 2. Native vegetation will be retained to the greatest extent possible within shoreline jurisdiction where improvements are not proposed.
- 3. Only three trees within the project area will be removed to accommodate the installation of the outfall system.
- 4. Clearly demarcate the job site and critical areas that must be avoided prior to ground disturbing activities.
- 5. Install silt fencing on the waterward side of land disturbing activities in shoreline jurisdiction.
- 6. No equipment will enter below the OHWM of the Cowlitz River.
- 7. Vehicle and equipment maintenance, repair, and/or service will be performed at designated repair facilities whenever possible.
- 8. All equipment will be maintained or fueled up, a minimum of 200 feet from the Cowlitz River.
- 9. All bare soils within shoreline jurisdiction will be mulched with certified weed-free straw after ground disturbing activities.
- 10. Signage will be installed along the boundary of Area 1 and Area 3 to notify the public of mitigation locations and access restrictions (Figure 7).
- 11. Install large woody material rootwads and horizontal logs to deter entrance from the public to the stormwater outfall.

PROJECT IMPACT SUMMARY

All impacts have been minimized to the greatest extent possible. All mitigation for impacts to the shoreline buffer and shoreline jurisdiction of the Cowlitz River is proposed onsite. Most project impacts come from the proposed grading and fill, and the installation of the proposed dual outfall piping system. Proposed impacts to critical areas onsite are included in the table below.

Shoreline Buffer Impacts									
Habitat Area	Proposed Impact	Size of Impact							
Shorolino Ruffor for	Permanent Shoreline Buffer Impact	0.002 acres/108 square feet							
Cowlitz River (RHA)	Temporary Shoreline Buffer Impact	0.217 acres/9,444 square							
		feet							
Shoreline Impacts									
Habitat Area	Proposed Impact	Size of Impact							
Shoreline Jurisdiction for	Tomporary Sharaling Jurisdiction	0.014 acres/629 square feet							
the Cowlitz River									
(outside of RHAs)	inipact								

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ONSITE MITIGATION

The applicant is proposing project impacts be compensated for through onsite, in-kind mitigation. The goal of onsite mitigation is to ensure no net loss of ecological functions and meet vegetation conservation standards established in the SMP. The generally accepted mitigation ratio for permanent impacts and temporary impacts to shoreline buffers and shoreline jurisdiction impacts, in ELS experience, has been generally accepted at 1:1 mitigation ratio. CT6, LLC proposes a comprehensive onsite mitigation plan to address project impacts within the shoreline buffer and shoreline jurisdiction of the Cowlitz River. The plan includes:

- <u>Permanent Impacts</u>: Mitigation at a 2:1 ratio for permanent impacts to the shoreline buffer resulting from the installation of a gabion wall.
- <u>Temporary Impacts</u>: Mitigation at a 1:1 ratio for temporary impacts to the shoreline buffer and shoreline jurisdiction caused by grading and the installation of an outfall pipe system.
- <u>Tree Removal</u>: Mitigation at a 4:1 stem count ratio for the removal of three black cottonwood trees within the shoreline buffer to accommodate the outfall system installation.

Mitigation includes a combination of restoration and enhancement with an upland native grass seed application and installing native trees and shrubs. In addition to these measures, CT6, LLC will install habitat features within the shoreline buffer of the Cowlitz River to ensure no net loss of ecological function. Performance standards, monitoring, maintenance, and contingency methods will be discussed in subsequent sections of this report to ensure the mitigation areas are successful.

III. EXISTING SITE CONDITIONS

The site consists of undeveloped area within the recreation land use designated for recreation use in the approved Landing on the Cowlitz (LOTC) Master Plan and subsequent minor modification (Ordinance No. 2021-10 and Resolution No. 2024-03) (Master Plan). The site is further identified as Parcel 308120500 (BLA Parcel No. 3, CR-BLA-24-01 - AFN3762029 and AFN 3763318).

The site primarily consists of mudflow derived from the 1980 eruption of Mount St. Helen's or by dredge from the Cowlitz River. The site features sporadic vegetation consisting of deciduous native trees, herbaceous grasses and weeds, and non-native invasive species including scotch broom (*Cytisus scoparius*) and Himalayan blackberry (*Rubus armeniacus*). The site itself requires the removal of three (3) black cottonwood (*Populus trichocarpa*) trees in order to facilitate the grading and installation of the stormwater outfall system. Existing site slopes are less than 2:1. For more information, see the Habitat Management, Mitigation and Monitoring Plan dated December 4, 2024, prepared by Ecological Land Services, Inc.

IV. CONFORMANCE WITH THE CITY OF CASTE ROCK SHORELINE MASTER PROGRAM (ORD. 2022-03, MAY 9, 2022)

The following narrative addresses the way in which the proposed stormwater outfall has been designed in compliance with the City of Castle Rock Shoreline Master Program (SMP). Only applicable Sections of the SMP are included below and text appearing in italics denotes information contained within the SMP. Response text follows each SMP section. Ellipses ([...]) that appear to denote a truncation of SMP code text which does not apply.

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[...]

5. <u>Shoreline Environment Designations and Shorelines of Statewide Significance</u> [...]

5.4 Shoreline Environment Designations

The City classification system consists of shoreline environment designations that are consistent with and implement the Act, the Program, and the City of Castle Rock Comprehensive Plan. These designations have been assigned consistent with the corresponding criteria provided for each shoreline environment designation. In delineating shoreline environment designations, the City aims to ensure that existing shoreline ecological functions are protected with the proposed pattern and intensity of development. Such designations should be consistent with the policies for restoration of degraded shorelines. The shoreline environment designations are, High-Intensity, Residential, Aquatic, and Recreation.

5.4.1 High-Intensity Environment

[...]

Management Policies

A. Priority should be given to water-dependent, water-related, and water-enjoyment uses in that order of preference. Non-water-oriented uses within the High-Intensity shoreline environment designation are appropriate on sites where there is no direct access to the shoreline because of another property separating it from the shoreline or an intervening public right-of-way.

Response: This proposal involves a water-dependent use within the High-intensity shoreline buffer. The purpose of the stormwater project is to facilitate the inclusion of critical infrastructure and does not include the provision of direct vehicular or pedestrian access to the shoreline. This proposal has been designed to enhance the ecological functions of the site. Existing undeveloped site conditions deciduous native trees, herbaceous grasses and weeds, and non-native, invasive species including sporadic scotch broom (*Cytisus scoparius*) and Himalayan blackberry (*Rubus armeniacus*). Site conditions are not resultant from previous degradation.

B. Non-water-oriented uses on sites adjacent to the water should provide public benefit in the form of ecological enhancement and/or public access in compliance with the provisions of this Program.

Response: Not applicable. This proposal involves a water-dependent use and as such the criteria for non-water-oriented uses does not apply.

c. Where unavoidable impacts to ecological functions occur, appropriate mitigation should be provided in accordance with this Program to achieve no-net-loss. Where applicable, development should include environmental cleanup and restoration of the shoreline in accordance with relevant state and federal law.

Response: This proposal involves unavoidable impacts to a portion of the Cowlitz River shoreline buffer area and the regulatory floodplain and as such, is required to include mitigation measures to ensure no-net-loss is achievable for the area.

This proposal has been designed to include onsite compensatory mitigation in order to achieve no net loss of habitat function:

- 2:1 ratio for permanent impacts associated with the installation of the gabion wall for the stormwater outfall;
- 1:1 ratio for temporary impacts associated with the installation of a stormwater outfall gabion wall, and;
- 4:1 stem count ratio for permanent impacts associated with tree removal

The mitigation that has been designed for this proposal exceed the 1:1 ratio which is generally accepted for permanent and temporary impacts within critical areas.

C. Visual and/or physical public access should be provided, where feasible.

Response: Not applicable. This proposal involves the construction of stormwater infrastructure on a privately owned site devoid of public access roads.

D. Aesthetic objectives of this Program should be in character with high intensity development and include height limits, screening, and other standards consistent with the primary purpose of accommodating high-intensity uses.

Response: This proposal has been designed in conformance with the aesthetic objectives of this Program. While topography renders the proposed stormwater outfall imperceivable from the nearest development located adjacent to Larsen Lane SW, the mitigation plan includes plantings which shall obstruct visibility of the stormwater outfall. The proposed plantings will further shield the Cowlitz River from any upland development in the vicinity of the outfall.

E. Existing urban areas appropriate for intensive development should be fully utilized before expanding intensive development into other areas.

Response: Not applicable. The site is not located within an existing urban area nor does the installation of essential stormwater infrastructure constitute an expansion of an existing intensive development into other areas.

Designation Criteria

The High-Intensity environment designation is given to shoreline areas within the City of Castle Rock if they currently support or are planned for high-intensity uses related to commercial, industrial, or transportation.

Response: The site is planned for adjacent high intensity uses in the future.

6. General Shoreline Regulations

This Chapter describes general regulations which apply to all shorelines of the state that are located in the City of Castle Rock. The general regulations Section is used in conjunction with the use and modification regulations found in Chapter 7.

6.1 No Net Loss of Ecological Function

A. All shoreline use and development, including preferred uses and uses that are exempt from permit requirements, shall be located, designed, constructed, conducted, and maintained in a manner that maintains shoreline ecological functions, in accordance with the mitigation sequencing provisions of the Program.

Response: This proposal has been designed to avoid and minimize impacts to the buffer by limiting the area of impact to the shoreline buffer involving 108 square feet (0.002 acres) of permanent impact and 9,444 square feet (0.217 acres) of temporary impact, and 629 square feet (0.014 acres) outside of the shoreline buffer but within shoreline jurisdiction. In addition, this proposal includes compensatory mitigation of 2:1 for permanent impacts, exceeding the generally accepted ratio of 1:1. Furthermore, non-native invasive species shall be cleared from the project area which shall enhance environmental conditions and result in no net loss of ecological function onsite within the area of impact. The small project footprint, BMPs, and proposed mitigation measures will maintain ecological functions.

B. Shoreline ecological functions that shall be protected include, but are not limited to, fish and wildlife habitat, food web support, and water quality maintenance.

Response: This proposal involves the installation of a stormwater system landward of the ordinary high water mark (OHWM) which shall avoid direct impacts to aquatic life. The native plantings included as part of the proposed mitigation plan shall provide an enhanced environmental quality within an area which currently features non-native, invasive plant species. Furthermore, this proposal includes a stormwater system with water quality treatment outside of the regulatory shoreline wherein which only treated and controlled stormwater runoff shall be discharged within the shoreline buffer of the Cowlitz River. The installed vegetation will slow surface runoff, reduce the potential for erosion, and promote infiltration, which protects water quality functions of the shoreline buffer. Additionally, the proposed vegetation and habitat features will provide nesting, roosting, and foraging opportunities.

C. Shoreline processes that shall be protected include, but are not limited to, water flow; erosion and accretion; infiltration; groundwater recharge and discharge; sediment delivery, transport, and storage; large woody debris recruitment; organic matter input; nutrient and pathogen removal; and stream channel formation/maintenance.

Response: This proposal has been designed to minimize impacts to shoreline processes by including a stormwater outfall above the OHWM with a permanent impact area limited to 108 square feet (0.002 acres) within the Cowlitz River shoreline buffer. The limited area of impact along with the proposed shoreline stabilization associated with the onsite mitigation shall reduce interruption to the shoreline processes. Erosion control and stabilization measures for the onsite restoration and enhancement shall include the installation of biodegradable jutte matting prior to the installation of habitat features such as rootwads and rootwad logs. The area proposed for the outfall is not significantly downcut and does not appear to have frequent erosion. Sediment transport and accretion will be maintained. Groundwater recharge will be supported through stormwater discharge to the riparian buffer. Because the proposed outfall is located landward of the OHWM, large woody material recruitment will not be impacted.

D. In-water work shall be scheduled to protect biological productivity (including but not limited to fish runs, spawning, and benthic productivity). In-water work shall not occur in areas used for commercial fishing during a fishing season unless specifically addressed and mitigated for in the permit.

Response: Not applicable. This proposal does not include or require in-water work.

- E. An application for any permit or approval shall demonstrate all reasonable efforts have been taken to provide sufficient mitigation such that the activity does not result in net loss of ecological functions. Mitigation shall occur in the following prioritized order:
 - 1. Avoid the adverse impact altogether by not taking a certain action or parts of an action or by moving the action.

Response: The project has been designed to avoid impacts to the shoreline buffer and shoreline jurisdiction to the greatest extent practicable. Due to the landscape position of the Phase 1a boundary and the water-related/water orientated nature of the stormwater outfall, complete avoidance of impacts to shorelines was not possible.

2. Minimize adverse impacts by limiting the degree or magnitude of the action and its implementation by using appropriate technology and engineering, or by taking affirmative steps to avoid or reduce adverse impacts.

Response: Permanent impacts from the proposed gabion wall are limited to 0.002 acres (108 sq. ft.) and will be offset with a 2:1 onsite mitigation ratio. Additionally, permanent impacts from grading and installation of the outfall system within the shoreline buffer necessitates the proposed removal of three black cottonwood (*Populus trichocarpa*) trees. Neither of these permanent impacts could be avoided to accommodate project design. Alternative locations for the outfall would result in the same amount of vegetation removal or more.

3. Rectify the adverse impact by repairing, rehabilitating, or restoring the affected environment.

Response: The affected environmental shall be restored to pre-project conditions and further enhanced with the inclusion of erosion control measures including jutte matting and hydroseeding of all disturbed areas. Native trees and shrubs as well as habitat features will be installed to result in no net loss of ecological functions. A total of 0.268 acres of the shoreline will be restored and enhanced with native trees and shrubs. Furthermore, the habitat mitigation plan includes the removal of non-native invasive species. For more details about the proposed onsite restoration and enhancement, see Table 2 and 5 within the Habitat Management, Mitigation and Monitoring Plan by Ecological Land Services.

4. Reduce or eliminate the adverse impact over time by preservation and maintenance operations during the life of the action.

Response: This proposal has been designed to include a monitoring and maintenance plan for three (1) restoration areas over the course of five (5) years to ensure the mitigation goals, objective, and performance standards are being met. Native vegetation will be monitored for overall success including survival and percent cover. Maintenance to the mitigation areas will include invasive vegetation removal, competing vegetation removal, and irrigation. Over the long term, the stormwater outfall and associated facility will be maintained for the life of the project to ensure proper function and to avoid impacts to the shoreline buffer and water quality.

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5. Compensate for the adverse impact by replacing, enhancing, or providing similar substitute resources or environments. Preference shall be given to measures that replace the impacted functions on site or in the immediate vicinity of the impact. However, alternative compensatory mitigation within the watershed that addresses limiting factors or identified critical needs for shoreline resource conservation based on watershed or comprehensive resource management plans may be authorized.

Response: The compensatory mitigation included in the Habitat Management, Mitigation and Monitoring Plan serves to replace and enhance the impacted environment within the area of temporary and permanent impact associated with the installation of the stormwater outfall. Onsite mitigation will ensure the impacted functions are replaced onsite and will result in no net loss of ecological function.

6. Monitor the adverse impact and take appropriate corrective measures.

Response: This proposal includes a five- (5) year monitoring plan and includes corrective measures, if they are needed. The outfall will be monitored regularly to ensure proper function.

F. Applicants for permits have the burden of proving that the proposed development is consistent with the criteria set forth in this Program and the Act, including demonstrating all reasonable efforts have been taken to provide sufficient mitigation such that the activity does not result in net loss of ecological functions.

Response: This proposal includes a Habitat Management and Mitigation Plan (Plan) and Monitoring Plan which details the proposed mitigation for anticipated permanent impacts in exceedance of the generally accepted mitigation ratio of 1:1. The Plan also includes 1:1 restoration and enhancement for temporary impacts.

G. Uses and development activities that comply with the provisions of the Castle Rock Comprehensive Plan and the Castle Rock Municipal Code may be permitted landward of levees, dikes, revetments, roads, railways, and rights-of-way, in accordance with the provisions of the Shoreline Management Act and this Program, including but not limited to the provisions requiring no net loss of ecological function and mitigation sequencing.

Response: This proposal includes the provision of critical infrastructure and includes no net loss of ecological function and mitigation sequencing in conformance with the different City- and State-level regulatory requirements of the Comprehensive Plan, Castle Rock Municipal Code, City's SMP and the State Shoreline Management Act. The mitigation plan developed in conjunction with the proposed stormwater outfall includes an overall lift in ecological function within the existing riparian and shoreline habitat through the proposed plantings and habitat features, removal of non-native and invasive plant species, and the proposed compensatory mitigation ratios meeting and exceeding the generally accepted mitigation ratio.

- 6.2 Archaeological, Cultural, and Historic Resources
 - A. If historic, cultural, or archaeological sites or artifacts are discovered in the process of development, work shall be stopped immediately in accordance with the provisions of federal, state, and local laws, the site secured, and the find reported as soon as possible to the City. The property owner also shall notify the Washington State

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> Department of Archaeology and Historic Preservation (DAHP) and affected tribes. The City may provide for a site investigation by a qualified professional and may provide for avoidance or conservation of the resources in coordination with appropriate agencies. All shoreline permits shall contain a special provision notifying permittees of this requirement. Failure to comply with this requirement shall be considered a violation of the shoreline permit and shall subject the permittee to legal action.

> **Response:** The Applicant acknowledges that adherence to federal, state and local laws. Pursuant to the Developer's Agreement Exhibit C, Notice of Modifications to the Mitigated Determination of Non-Significance, Item 13, requires consultation between the City and Project Sponsor and the Cowlitz Tribe prior to the initiation of any ground disturbing activities. Consultation took place prior to the initiation of the approved Landing on the Cowlitz Master Plan mass grading.

This proposal is subject to the Inadvertent Discovery Plan (Report No. 4820) dated July 18, 2022, by the Archaeological Investigations Northwest, Inc. for the Landing on the Cowlitz Master Plan. Refer to the Inadvertent Discovery Plan for more details.

B. Prior to approval of development in an area of known or probable cultural resources, the City shall require a site assessment by a qualified professional archaeologist in coordination with affected tribes. Conditions of approval may require preservation or conservation of cultural resources as provided by applicable federal, state, and local statutes. All permits issued for development in areas known to be archaeologically significant shall provide for monitoring of any development activity for previously unidentified cultural resources.

Response: The Applicant has satisfied this site assessment requirement with the approved Master Plan and involved a scope inclusive of the overall site. Should any cultural resources or archaeological items of significance be discovered with any ground disturbing activities, all work shall be required to immediately cease and protocol included in the Inadvertent Discovery be adhered to.

6.3 Critical Areas Protection

Critical Areas Regulations are in Appendix B. 6.3.1 Applicable Critical Areas

For purposes of this Program, the following critical areas, as defined in Appendix B, will be protected under this Program: Wetlands; Critical Aquifer Recharge Areas; Frequently Flooded Areas; Geologically Hazardous Areas; and Fish and Wildlife Habitat Conservation Areas.

Response: The site is located within frequently flooded areas including the regulatory floodway and the 100-year floodplain of the Cowlitz River, and within fish and wildlife habitat conservation areas in the shoreline buffer. As such, the Critical Areas Regulations contained within the City of Castle Rock Municipal Code (CRMC) Chapter 15.24, Chapter 18.10.130, and Chapter 18.10.140 apply to this proposal.

6.3.2 General Provisions

A. Shoreline uses, activities, developments and their associated structures and equipment shall be located, designed and operated to protect the ecological processes and functions of critical areas. Provide a level of protection to critical areas located within shoreline jurisdiction that assures no

net loss of shoreline ecological functions necessary to sustain shoreline natural resources.

Response: This proposal involves the inclusion of critical infrastructure and has met mitigation sequencing, including proposed mitigation measures which are designed to result in no net loss of shoreline ecological functions necessary to sustain shoreline natural resources.

B. New and/or expanded development proposals shall integrate protection of wetlands, fish and wildlife habitat, and flood hazard reduction with other stream management provisions to ensure no net loss of ecological functions.

Response: This proposal includes the construction of stormwater infrastructure and integrates enhancement and long-term protection measures to result in a no net loss of ecological functions.

C. Critical areas within the shoreline jurisdiction shall be regulated for any use, development, or activity as provided in accordance with this Program and Appendix B.

Response: The Applicant acknowledges that the proposed stormwater outfall is subject to shoreline and critical areas regulations.

D. If provisions of Appendix B and other parts of this Program conflict, the provisions most protective of ecological resources shall apply, as determined by the City.

Response: The Applicant acknowledges that should any provisions of the Appendix B and other parts of this Program conflict, the provisions of the most protective ecological resources shall apply, as determined by the City. Ecological resources have been protected and enhanced to the greatest extent practicable.

E. Unless otherwise stated, critical area buffers associated with jurisdictional shoreline areas shall be regulated in accordance with this Program and Appendix B, including but not limited to, Section 2.5, Table 7, and Table 8.

Response: The Applicant acknowledges that the critical areas associated with jurisdictional shoreline areas shall be regulated in accordance with this Program and Appendix B, including but not limited to, Section 2.5, Table 7, and Table 8. No wetlands are present within the project area. Shoreline buffers have been established according to Table 7, which refers to Table 8. The shoreline buffer for this reach code is 150 feet.

F. These provisions do not extend the shoreline jurisdiction beyond the limits specified in this Program as defined in Section 3.1, Applicability.

Response: The Applicant acknowledges that these provisions shall not extend the shoreline jurisdiction beyond the limits specified in this Program as defined in Section 3.1, Applicability.

G. All critical areas and critical areas buffers located outside of the jurisdiction of the Shoreline Management Act shall be subject to the provisions of the Castle Rock Municipal Code and the Washington State Growth Management Act.

Response: The Applicant acknowledges that all critical areas and critical areas buffers located outside of the jurisdiction of the Shoreline Management Act shall be subject to the provisions of the Castle Rock Municipal Code and the Washington State Growth Management Act. This proposal involves work within area designated as frequently flooded and as such must comply with all applicable regulations.

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6.4 Flood Prevention and Flood Damage Minimization

This Program addresses flooding in two different ways. This Section includes flood hazard reduction measures, including flood control works, intended to avoid increasing hazards and minimize damage. Section 6.3 includes flood hazard protections through the Critical Areas Regulations.

A Development or uses in floodplains shall avoid significantly or cumulatively increasing flood hazards, and shall be consistent with Chapter 15.24 of the CRMC.

Response: This proposal has been designed to reduce site flood hazards by facilitating appropriate drainage of the overall master plan site. In addition, the outfall has been designed to include an inline check valve outside of the outfall pipe which in the event of side flooding, shall facilitate the utilization of an existing on-site ditch on the western side of the property for emergency storage. This proposal has been designed to include a parallel thirty- (30) inch system which shall separately handle off-site flows captured.

B. New residential, commercial, or industrial development and uses, including subdivision of land, within shoreline jurisdiction are prohibited if it would be reasonably foreseeable that the development or use would require structural flood hazard reduction measures in the channel migration zone or floodway over the life of the development.

Response: Not applicable. This proposal includes a stormwater outfall and does not comprise new residential, commercial or industrial development and uses.

- C The following uses and activities may be authorized in floodways or channel migration zones when otherwise permitted by this Program:
 - 1. Actions and development with a primary purpose of protecting or restoring ecological functions and ecosystem-wide processes.

Response: Not applicable. This proposal does not include a use with a primary purpose of protecting or restoring ecological functions and ecosystem-wide processes.

2. Forest practices in compliance with the Washington State Forest Practices Act and its implementing rules.

Response: Not applicable. The site is not located within a forested area and does not include forest practice uses.

3. Existing and ongoing agricultural practices, provided that no new restrictions to channel movement occur.

Response: Not applicable. This proposal does not involve existing or ongoing agricultural practices.

4. Bridges, utility lines, public stormwater and wastewater facilities and their outfalls, and other public utility and transportation structures where no other feasible alternative exists, or where the alternative would result in unreasonable and disproportionate costs. Where such structures are allowed, mitigation shall address impacted functions and processes in the affected shoreline.

Response: This proposal involves the construction of stormwater utility lines and a stormwater outfall which shall be dedicated to the City of Castle Rock. There is no other feasible alternative for locating this infrastructure elsewhere as no other location could accommodate stormwater from both on- and off-site flows for the master plan.

5. Repair and maintenance of an existing legally established use, provided flood hazards to other uses are not increased and that the activity does not cause significant ecological impacts that cannot be mitigated.

Response: Not applicable. This proposal does not involve an existing use.

6. Development in Castle Rock, where structures exist that prevent active channel movement and flooding.

Response: Not applicable. The site is devoid of development.

7. Modifications or additions to an existing nonagricultural legal use, provided that channel migration is not further limited and that the new development includes appropriate protection of ecological functions.

Response: Not applicable. This proposal does not involve modifications or additions to an existing nonagricultural legal use.

8. Measures to reduce shoreline erosion provided that it is demonstrated that the erosion rate exceeds that which would normally occur in a natural condition, that the measures do not interfere with fluvial hydrological and geomorphological processes normally acting in natural conditions, and that the measures include appropriate mitigation of impacts to ecological functions associated with the river or stream.

Response: The proposed outfall is located landward of the OHWM and will not interfere with fluvial hydrological and geomorphological processes. This section of the Cowlitz River is linear and there is extremely minimal aggradation or degradation occurring in the area of the outfall. The proposed enhancements will not interfere with natural processes. This proposal has been designed to further include erosion control measures involving the installation of:

- (1) A gabion wall wherein which stormwater shall be discharged;
- (2) Biodegradable jutte matting
- (3) Large woody material for habitat enhancement and riparian bank stabilization
- (4) Native shrubs, and spreading native seed mix

In addition, the Erosion Control Notes as included in the Phase 1 Access and Utilities Plan (Sheet C0.1) shall be adhered to:

- 1. The contractor shall ensure that all erosion control measures are intact and in working condition prior commencement of drainage facility construction.
- 2. A high-visibility fence shall be installed and composed of a high-density polyethylene material and shall be at least four feet in height. Posts for the fencing shall be steel or wood and placed every 6 feet on center (maximum) or as needed to ensure rigidity. The fencing shall be fastened to the post every six inches with a polyethylene tie. On long continuous lengths of fencing, a tension wire or rope shall be used as a top stinger to prevent sagging between posts. The fence color shall be high-visibility orange. The fence tensile strength shall be 360 lbs/ft using the ASTM D4595 testing method. If appropriate install fabric silt fence in accordance with BMP C233: Silt fence to act as high-visibility fence. Silt fence shall be at least 3 feet high and must be highly visible to meet the requirements of this BMP. Metal fences shall be designated and installed according to the manufacturer's specifications. Metal fences shall be at least 3 feet high and must be highly visible. Fences shall not be wired or stapled to trees. If

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the fence has been damaged or visibly reduced, it shall be repaired or replaced immediately and visibly restored.

- 3. Approval of this Erosion/Sedimentation Control (ESC) Plan does not constitute an approval of permanent road or drainage design (e.g. size and location of roads, pipes, restrictors, channels, retention facilities, utilities).
- 4. The implementation of this ESC Plan and the construction, maintenance, replacement, and upgrading of these ESC BMPs is the responsibility of the Applicant until all construction is completed and approved and vegetation/landscaping is established.
- 5. Clearly flag the boundaries of the clearing limits shown on this plan in the field prior to construction. During the construction period, no disturbance beyond the flagged clearing limits shall be permitted. The flagging shall be maintained by the Applicant for the duration of construction.
- 6. Construct the ESC BMPs shown on this Plan in conjunction with all clearing and grading activities, and in such a manner as to ensure that sediment and sediment laden water do not enter the drainage system, roadways, or violate applicable water standards.
- 7. The ESC BMPs shown on this plan are the minimum requirement for anticipated site conditions. During the construction period, upgrade these ESCP BMPs as needed for unexpected storm events and to ensure that sediment and sediment-laden water do not leave the site.
- 8. The Applicant shall inspect the ESC BMPs daily and maintain them as necessary to ensure their continued functioning. Inspect and maintain the ESC BMPs on inactive sites a minimum of once a month or within the 48 hours following a major storm event (i.e. a 24-hour storm event with a 10-yr or greater recurrence interval).
- 9. At no time shall the sediment exceed 60-percent of the sump depth or have less than 6-inches of clearance from the sediment surface to the invert of the lowest pipe. All catch basins and conveyance lines shall be cleaned prior to pacing. The cleaning operation shall not flush sediment laden water into the downstream system.
- 10. Install stabilized construction entrances at the beginning of construction and maintain for the duration of the project. Additional measures may be required to ensure that all paved areas are kept clean for the duration of the project.
- D. Removal of materials for flood management purposes shall be consistent with an adopted flood hazard reduction plan in accordance with the mitigation sequencing provisions of this Program and shall only be allowed if a biological and geomorphological study demonstrates a long-term benefit to flood hazard reduction.

Response: This proposal does not include the removal of materials for flood management purposes.

E. Channel Migration Zones:

[...]

Response: Not applicable. Pursuant to the State of Washington Department of Ecology mapping, the site is not located in the Channel Migration Zones.

F. Flood Control Works:

[...]

Response: This proposal does not involve the inclusion of structural flood hazard reduction measures.

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6.5 Public Access

[...]

Response: Not applicable. This proposal does not include the provision of a public project, it is not a waterdependent proposal that increases demand for public access, and does not interfere with existing access or use of public waters subject to the Public Trust Doctrine. Furthermore, the site is physically separated by property that is current undeveloped.

6.6 Vegetation Conservation

A. All development shall minimize vegetation removal in areas of shoreline jurisdiction to the amount necessary to accommodate the permitted use.

Response: This proposal has been designed to minimize the amount of vegetation removal within the shoreline by limiting the overall area of permanent impact to 0.002 acres (108 square feet). The installation of the outfall necessitates the removal of vegetation consisting of non-native invasive species including Scotch broom (Cytisus scoparius) and Himalayan blackberry (Rubus armeniacus). The three black cottonwood trees to be removed will be replaced onsite at a 4.:1 stem count ratio. Temporary shoreline vegetation impacts are limited to herbaceous and non-native vegetation.

B. Unless otherwise specified, all shoreline uses and development shall comply with the setback and buffer provisions of this Program included in Table 7-1 and Appendix B, to protect and maintain shoreline vegetation.

Response: This proposal includes a stormwater outfall and as such meets the criteria for the utilities shoreline use included in Table 7-1. Utilities may be permitted through a Shoreline Substantial Development Permit (SSDP). Shoreline vegetation has been protected and maintained through mitigation sequencing and onsite enhancement. For more information, see the discussion included below in response to Section 7 of the City of Castle Rock Shoreline Master Program.



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[Source: Landing on the Cowlitz Stormwater Outfall Plan Set – Sheet C6.0, Outfall Enlargement]

C. Vegetation conservation standards of this Program shall not apply retroactively in a way which requires lawfully existing uses and developments, including residential landscaping and gardens, to be removed, except as required as mitigation for new and expanded development. Routine maintenance of existing landscaping and gardens is allowed.

Response: Not applicable. This proposal does not include the request to approve of vegetation conservation in response to retroactive removal of vegetation within the shoreline and associated buffer.

D. Vegetation may be removed or altered landward of shoreline buffers described in this Program provided that there is no net loss of ecological function.

Response: It is not anticipated that this proposal will require the removal or alteration of vegetation landward of shoreline buffers described in this Program. Temporary impacts to herbaceous vegetation will occur to install the underground pipers. This area will be restored through native seed installation.

E. Shoreline landowners are encouraged to preserve and enhance sustainable woody vegetation and sustainable groundcovers to stabilize soils and provide habitat. When shoreline uses or modifications require a planting plan (i.e., uses or modifications that require a mitigation plan), maintaining sustainable plant communities, replacing noxious weeds and avoiding installation of ornamental plants are preferred. Non- native vegetation requiring use of fertilizers, herbicides/pesticides, or summer watering is discouraged.

Response: This proposal includes a shoreline use which necessitates mitigation plantings. The mitigation included with this proposal includes the enhancement of the shoreline area with the installation of large woody material rootwads and horizontal logs to deter entrance from the public to the stormwater outfall. Proposed native trees and shrubs are woody vegetation that will provide additional bank stability.

F. Mitigation plans shall be approved before initiation of other permitted activities, unless a phased schedule that ensures completion prior to occupancy has been approved.

Response: The Applicant acknowledges that the mitigation plan must be approved by the City of Castle Rock prior to the initiation of activities within the jurisdictional shoreline and associated buffer.

G. Aquatic weed control shall only occur to protect sustainable plant communities and associated habitats or where an existing water-dependent use is restricted by the presence of weeds. Aquatic weed control shall occur in compliance with all other applicable laws and standards and shall be done by a qualified professional.

Response: Not applicable. This proposal does not include or require alteration of aquatic weeds.

H. Limbing or crown thinning shall comply with the Tree Care Industry Association pruning standards, unless the tree is a hazard tree as defined by this SMP. No more than 25 percent of the limbs of any single tree may be removed and no more than 20 percent of the canopy cover in any single stand of trees may be removed for view preservation.

Response: Not applicable. This proposal does not involve the limbing or crowning of trees and instead necessitates the removal of three cottonwood trees.

I. The clearing of non-native vegetation is allowed as is routine landscape maintenance and family gardening, when conducted using hand-held equipment.

Response: While this proposal shall require the clearing of non-native vegetation it shall not be undertaken as part of routine maintenance and family gardening. The site is devoid of an existing garden.

J. Vegetation may be removed or altered landward of shoreline buffers described in this Program provided that there is no net loss of ecological function.

Response: It is not currently anticipated that this proposal will necessitate permanent vegetation removal landward of the shoreline buffers for the installation of the stormwater outfall.

6.7 Water Quality and Quantity

A. All shoreline development shall comply with the applicable requirements of the Castle Rock Comprehensive Plan, which identifies the 1992 Puget Sound Stormwater Management Manual, as approved by the City, as the guidance for the City's program, and best management practices to prevent impacts to water quality and stormwater quantity that would result in a net loss of shoreline ecological functions and/or a significant impact to aesthetic qualities or recreational opportunities.

Response: This proposal has been designed in conformance with the applicable requirements of the Castle Rock Comprehensive Plan, the 1992 Puget Sound Stormwater Management Manual.

B. Stormwater management structures including ponds, basins, and vaults shall be located outside of shoreline jurisdiction where possible, as far from the water's edge as feasible, and shall minimize disturbance of vegetation conservation buffers. Low impact development facilities (which do not substantially change the character of the shoreline) such as vegetation filter strips, grass-lined swales, and vegetated bioretention and infiltration facilities, are encouraged in association with development allowed in shoreline jurisdiction.

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Response: This proposal involves the installation of a stormwater outfall within the shoreline jurisdiction as no other location alternative is practicable which would avoid vegetation removal or impacts to the buffer associated with waterbodies. This proposal has been designed to minimize the disturbance of vegetation to the shoreline and associated buffer with anticipated total impacts of 0.22 acres (9,552 square feet) which is comprised of permanent impacts of 0.002 acres (108 square feet), 0.217 acres (9,444 square feet) of temporary impacts and the removal of three (3) black cottonwood trees. The proposed enhancements with native vegetation and habitat features will not substantially change the character of the shoreline, and will blend in with surrounding habitat.

- C. Sewage management. To avoid water quality degradation, sewer service is subject to the requirements outlined below.
 - 1. Any existing septic system or other on-site system that fails or malfunctions will be required to connect to an existing municipal sewer service system infeasible, or make system corrections approved by the Cowlitz County Environmental Health Unit.
 - 2. Any new development, business, single-family or multi-family unit will be required to connect to an existing municipal sewer service system if feasible, or install an on-site septic system approved by Cowlitz County Environmental Health Unit.

Response: Not applicable. This proposal does not involve sewage management facilities.

7. Specific Shoreline Use Regulations

The regulations in this Chapter apply to specific uses within shoreline jurisdiction. In many circumstances, more than one Section of use regulations will apply to a specific proposal. Guiding policies for uses and modifications are located in Chapter 4.

- 7.1 Shoreline Use, Modification, and Standards Tables
 - A. Table 7-1 Shoreline Use, Modification, Setbacks, and Heights, shall be used to determine which uses may be permitted (P), approved with conditions through the issuance of a Shoreline Conditional Use Permit (SCUP), or prohibited (X) in each shoreline environment. Specific regulations for each corresponding Use and Modification can be found in Chapters 7 of the SMP.

Response: This proposal includes utilities and is permissible through an approved Shoreline Substantial Development Permit (SSDP).

B. All uses and development activities proposed for jurisdictional shoreline areas must comply with all provisions of the Castle Rock Municipal Code, as determined by the City.

Response: This proposal has been designed in conformance with all applicable provisions of the City of Castle Rock Municipal Code. The Habitat Management, Mitigation and Monitoring Plan details the project compliance with critical areas regulations.

C. Setbacks shall be measured on a horizontal plane landward from the required feature described in Table 7-1 below. [NOTE: Excerpted portions of Table 7-1 is included herein:] Landing on the Cowlitz Stormwater Outfall Substantial Shoreline Development Permit Application – Narrative March 5, 2025 Page 19 of 22

Table Key: P = May be permitted through SSDP or SLE	Shoreline Environmental Designations					
Shoreline Use	High-Intensity	Residential	Recreation	Aquatic		
Utilities	Р	Р	Р	Р		
Dimensional						
Standards						
Buffer ⁽²³⁾	See Table 8, Appendix B [NOTE: High-Intensity Buffer for the Cowlitz River is 150 feet]					
Building setback from Buffer in Table 8, Appendix B, or Landward Toe of Levee Where Present ⁽²³⁾	10'	10'	10'	N/A		
Maximum Height	35'	35′	35′	35′		
Minimum River Frontage ⁽²²⁾	N/A	60′	N/A	N/A		

Response: This proposal will result in impacts to the 150-foot shoreline buffer. As such, an evaluation of the proposed impacts along with mitigation to result in no net loss of ecological function is required.

This proposal has been designed in conformance with the thirty-five- (35) foot maximum height with the provision of a two- (2) foot high gabion wall and the top of bank shall be reestablished minimizing the protrusion of the installed gabion wall. In addition, there are no river frontage requirements applicable to a high-intensity use included in Table 7-1.

7.2 Shoreline Use

7.2.1 Commercial

[...]

Response: Not applicable.

7.2.2 Forest Practices

[...]

Response: Not applicable.
7.2.3 Industrial

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[...]
Response: Not applicable.
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7.2.4 In-stream Structures
[...]

Response: Not applicable. This proposal has been designed outside of the Cowlitz Stream and is located above the ordinary high water mark (OHWM).

7.2.5 Mining [...]

Response: Not applicable. This proposal does not include mining related uses.

7.2.6 Recreational Development
[...]

Response: Not applicable. This proposal does not include recreational development.

7.2.7 Residential Development [...]

Response: Not applicable.

7.2.8 Transportation Facilities
[...]

Response: Not applicable.

7.2.9 Utilities Uses

These provisions apply to services and facilities that produce, convey, store, or process power, water, sewage, stormwater, gas, communications, oil, waste, and similar services and functions. On-site utility features serving a primary use, such as a water, sewer, or gas line to a residence or other approved use, are accessory utilities and shall be considered a part of the primary use.

A. New or expanded non-water dependent utilities or parts thereof may be located within shoreline jurisdiction only when the applicant demonstrates based on analysis of alternative locations and technologies that:

[...]

Response: Not applicable. This proposal involves the provision of a non-water-dependent use.

B. Overhead electrical transmission lines should be located outside of shoreline jurisdictional areas, unless infeasible due to site constraints, including but not limited to topography or safety, as determined by the City.

Response: Not applicable. This proposal does not involve overhead electrical transmission lines.

C. Transmission, distribution and conveyance facilities shall be located in existing rights of way and corridors or shall cross shoreline jurisdictional areas by the shortest, most direct route feasible, unless such route would cause significant environmental damage.

Response: This proposal includes the provision of a stormwater conveyance and discharge facility which crosses the shoreline jurisdiction area by the shortest, most direct route feasible. Additionally, the majority of the facility in shoreline jurisdiction is below ground, which further avoids environmental impacts.

D. Utility crossings of waterbodies shall be attached to bridges where feasible. Where attachment to a bridge is not feasible, underground construction methods that avoid surface disturbance are preferred.

Response: Not applicable. This proposal does not include utility crossings of water bodies.

E. All underwater pipelines transporting liquids intrinsically harmful to aquatic life or potentially harmful to water quality shall be equipped with automatic shut off valves.

Response: Not applicable. This proposal does not include the provision of underwater pipelines.

F. Structural utility buildings, such as pump stations, electrical substations, waste facilities, or other facilities shall be located outside of jurisdictional shoreline areas, unless no other feasible location exists, in which case they shall be visually compatible in scale with surrounding development and landscape to provide compatibility with natural features and adjacent uses.

Response: Not applicable. This proposal does not include the provision of a structural utility building.

G. Stormwater outfalls may be placed below the OHWM to reduce scouring. New outfalls and modifications to existing outfalls shall be designed and constructed to avoid impacts to existing native aquatic vegetation attached to or rooted in substrate.

Response: Not applicable. This proposal involves the provision of a stormwater outfall above the ordinary high water mark (OHWM).

- H. The presence of existing utilities shall not justify more intense development. Rather, the development shall be consistent with the City Comprehensive Plan, Development Regulations, and this SMP, and shall be supported by adequate utilities.
 - 1. Existing facilities such as the City's Municipal Water System and Sewer System, that are located landward of a levee, may be improved in accordance with the mitigation sequencing provisions contained in this Program.

Response: Not applicable. The site is devoid of existing utilities.

7.3.1Fill and Excavation

A. Fill may be placed in flood hazard areas only when otherwise allowed by the Frequently Flooded Areas Regulations in this Program (Appendix 8) and where it is demonstrated in a hydrogeological report prepared by a qualified professional that adverse impacts to hydrogeologic processes will be avoided.

Response: This proposal has been prepared by a licensed professional Engineer in the State of Washington. Included with this proposal is a stormwater report which evaluated the potential impacts of the proposed fill. No habitable structures exist or are proposed near the proposed outfall; therefore, the evaluation of a hydrogeological professional is not anticipated to be required. Furthermore, the proposed fill is limited to a small area and shall not cause a change in flood hazard conditions.

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- B. Fill placed below the OHWM for any other use besides ecological restoration requires a Shoreline Conditional Use Permit.
 - 1. Accomplish an aquatic habitat restoration plan.
 - 2. Support a mitigation action, environmental restoration, beach nourishment or other enhancement project.
 - 3. Correct the adverse results of past shoreline modification that have disrupted natural stream geomorphic conditions and adversely affected aquatic or terrestrial habitat.
 - 4. Support a water-dependent use.
 - 5. Serve as part of a public access proposal.
 - 6. Support cleanup of contaminated sediments as part of an interagency environmental cleanup plan, or permitted under MTCA or CERCLA.
 - 7. Expand or alter transportation facilities of statewide significance currently located on the shoreline only when demonstrated that alternatives to fill are not feasible.

Response: Not applicable. This proposal does not include fill placed below the ordinary high water mark (OHWM).

C. Fill is restricted in wetlands or fish and wildlife habitat conservation areas in accordance with the critical areas standards in this Program, Section 6.3, and Appendix B.

Response: Not applicable. This proposal does not include or require fill n restricted wetlands or fish and wildlife habitat conservation areas.

D. Excavation of previously deposited dredge spoils above the OHWM may be permitted if the spoils site is part of a dredge materials management plan and the spoils were not originally placed as part of a beach nourishment or other shoreline restoration project.

Response: Not applicable. This proposal does not involve the excavation of previously deposited dredge spoils.

E. Excavation below the OHWM is considered dredging and is subject to provisions in Section 7.3.5, Dredging and Dredge Material Stockpiling.

Response: Not applicable. This proposal does not include excavation below the ordinary high water mark (OHWM).

7.3.2Dredging and Dredge Material Stockpiling [...]

Response: Not applicable. This proposal does not involve dredging or in-water disposal of material.

7.3.3 Shoreline Habitat and Ecological Enhancement Projects

[...]

Response: Not applicable.

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V. CONCLUSION

This Shoreline Substantial Development Permit (SSDP) application narrative along with accompanying information has successfully met the burden of proof demonstrating compliance with the City of Castle Rock Shoreline Master Program (SMP). The Applicant respectfully requests the City's approval of the SSDP application.