

From: Shaun Dinubilo <sdinubilo@squaxin.us>
Sent: Thursday, June 2, 2022 9:33 AM
To: Nicole Floyd
Subject: West Bay Yards-Lack of Addressing the SIT's Cultural Resource Departments comments
Attachments: West Bay Yards-CRD Recommendations

Hello Nicole,

Thank you for keeping us in the loop about this project. After reviewing the documents, it has become clear to the Cultural Resource Department of the Squaxin Island Tribe that the comments we provided your agency and the applicant's archaeologist were not addressed. I have reattached the comments that was sent to your agency on 8/16/2021. I have also noticed that this email was not part of your consultation/administrative record for the project. We do encourage your agency to add the attachment and this email to your consultation record.

Lastly, all cultural resource reports and cultural resource sites under RCW 42.56.300 are considered confidential and are not for public disclosure.



Shaun Dinubilo
Archaeologist
Cultural Resource Department
Squaxin Island Tribe
200 S.E. Billy Frank Jr. Way
Shelton, WA 98584
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Email is my preferred method of communication.

As per 43 CFR 7.18[a][1]) of the Archaeological Resource Protection Act, Section 304 of the National Historic Preservation Act, and RCW 42.56.300 of the Washington State Public Records Act-Archaeological Sites, all information concerning the location, character, and ownership of any cultural resource must be withheld from public disclosure.

From: Steinweg, Noll E (DFW) <Noll.Steinweg@dfw.wa.gov>
Sent: Tuesday, June 14, 2022 4:58 PM
To: Nicole Floyd
Subject: Is a drift sill a groin?

Hi Nicole,

During our last meeting there was a question about drift sills and if they are the same thing as a groin.

WDFW's Marine Shoreline Design Guidelines (MSDG) defines a drift sill as:

Drift sill: Low elevation groin, typically constructed of rock, installed along with beach nourishment filled up to height of sill which is sometimes used to hold or slow littoral transport of placed sediment.

You can find a copy of the MSDG on our website here, (drift sill definition on PDF page 16):

<https://wdfw.wa.gov/publications/01583>

Hope this helps,
Noll

Noll Steinweg
Habitat Biologist, Thurston County
Washington Department of Fish and Wildlife
360-628-2173 (cell)

From: Steinweg, Noll E (DFW) <Noll.Steinweg@dfw.wa.gov>
Sent: Tuesday, June 14, 2022 4:19 PM
To: Nicole Floyd
Subject: RE: West Bay Yards
Attachments: West Bay Yards WDFW comment 7.21.pdf

Hi Nicole,

Thank you for the opportunity to review the second round submittal documents for the proposed West Bay Yards project.

The proponent has address our July 2021 comments (attached) regarding their groin design rational (Attachment M, Preliminary Engineering Design Report). The proponent has also been in communication with WDFW regarding a shellfish survey at the site to better quantify impacts from the proposed actions. I believe the proponent is currently pursuing a scientific collection permit before they can complete the shellfish survey.

We have no other comments to offer at this time but remain available.

Thank you,
Noll

Noll Steinweg
Habitat Biologist, Thurston County
Washington Department of Fish and Wildlife
360-628-2173 (cell)

From: Nicole Floyd <nfloyd@ci.olympia.wa.us>
Sent: Friday, May 27, 2022 12:45 PM
To: Rothwell, Rebecca (ECY) <rebs461@ECY.WA.GOV>; Steinweg, Noll E (DFW) <Noll.Steinweg@dfw.wa.gov>; Clinton, Brandon C CIV USARMY CENWS (US) <Brandon.C.Clinton@usace.army.mil>; Shaun Dinubilo <sdinubilo@squaxin.us>; Middleton, Thomas (ECY) <tmid461@ECY.WA.GOV>; Serdar, Carol (ECY) <cser461@ecy.wa.gov>; Lawson, Rebecca (ECY) <rlaw461@ECY.WA.GOV>
Subject: FW: West Bay Yards

External Email

Dear Agency Reviewer,

You are receiving this email because you provided comment on the West Bay Yard project and it has been revised/resubmitted to address all code related issues. Please access the project documents via the project website and let me know if your initial comments have been addressed and if have any new comments by **June 10, 2022**.

Website Link: https://www.olympiawa.gov/news_information/construction_in_olympia/west_bay_yards.php

Shaun – can you forward to anyone else at the tribe you think might be interested such as folks on the environmental team?

Nicole Floyd, AICP

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SQUAXIN ISLAND TRIBE

June 16, 2022

Nicole Floyd
Principal Planner
City of Olympia

Dear Nicole:

On behalf of the Squaxin Island Tribe Natural Resources Department, I am submitting comments concerning the West Bay Yards 2nd round submittal documents. These comments do not represent the views of any other department of the Squaxin Island Tribe.

The Department is supportive of what we perceive as the objective of the project- to place development within an urban area and restore almost 1/4 mile of marine shoreline.

Protecting and restoring natural resources, including fish and shellfish for Tribal members, is the fundamental mission of the Natural Resources Department. It has become clear over the years that business-as-usual will not get us there. It is going to take creative policies to turn the loss of resources, and thus the loss of treaty-protected rights, around.

We view the use of development, where it is already allowed, in conjunction with restoration as a creative way to achieve a net gain in shoreline function.

- The existing shoreline consists of concrete, asphalt rip-wrap rock placed over fill. The intertidal area consists of highly degraded mudflats.
- The proposed voluntary restoration will functionally remove almost 1/4 mile of shoreline armoring and provide substrate for marine intertidal vegetation, a habitat feature lacking in Budd Inlet due to past land-use practices.
- The proposed voluntary restoration is consistent with the City Of Olympia West Bay Environmental Restoration Assessment. Final Report. 2016. The Tribe participated in producing this document.
- The proposed voluntary restoration incorporates the City of Olympia sea level rise projections.
- The proposed construction and restoration sites will be raised by two feet to incorporate sea-level rise. This will result in 0.77 acres of area designated as aquatic being converted to upland. However, this aquatic area consists of concrete, boulders, and severely degraded landscape that provides little beneficial habitat. The placement of beach material will provide a clear environmental benefit compared to existing conditions.

Specific comments include:

- The proposed beach sill, as part of the restoration, is characterized as temporary. If the anticipated restoration to the south does not happen in a timely fashion, we recommend designing the sill so that it could be buried using beach material analogous to what is being proposed for the shoreline armoring.
- What methodology will be used and over what time period will the ordinary high water mark (OHWM) be measured?

The proposal to remove concrete debris, derelict pilings, and metal combined with the shoreline restoration and creation of a 30-foot Vegetative Conservation Area provided a unique opportunity to improve shoreline function along a significant portion of West Bay.

Scott Steltzner
Environmental Program Manager
Squaxin Island Tribe

**Natural Resources Department • 200 S.E. Billy Frank Jr. Way. • Shelton, WA 98584
Phone (360) 426-9781 • Fax (360) 426-3971**

From: Hunt, Joe (ECY) <johu461@ECY.WA.GOV>
Sent: Friday, June 17, 2022 9:39 AM
To: Nicole Floyd
Cc: Mullin, Tim (ECY); Lawson, Rebecca (ECY)
Subject: RE: West Bay Yards

Hi Nicole,

Thanks for your email and the links! And yes, we are in receipt of the documents you've listed. I've informally reviewed them all although we have yet to receive a formal request for opinion from the customer as according to their consultant Pioneer, they are still in the process of completing the remedial investigation (RI) phase which is required to define the nature and extent of contamination within all impacted media (e.g. soil, groundwater, soil vapor, and aqueous regime sediment) at the site. As we previously discussed, once Ecology receives, reviews and approves their RI report, the customer would then be required to prepare a feasibility study (FS) whereby several remedial (cleanup) alternatives would be compared against a standard suite of parameters such as cost-effectiveness, implementability, implementation risk, to name a few - with the ultimate goal of selecting their proposed remedial alternative. As with the RI, Ecology would then need to review and approve the FS based on how well the selected alternative best addresses the combined alternatives. Once Ecology approves the FS, the customer would then develop and submit a cleanup action plan (CAP) to Ecology for review and approval.

That being said, let me respond to your specific queries as follows:

1. Nicole: "I am looking mostly at the section that says due to the past clean up – excavation into the uplands is not viable because it would unacceptably threaten the integrity of the remedial action. Is that accurate?"

Ecology response: No that is not an accurate conclusion at the present time as the RI, FS, and CAP have yet to be completed and approved by Ecology. Only with Ecology review/approval through each of the 3 phases can a final remedial action be chosen, designed, and implemented. That being said, the statement as written with specific reference to removal of the existing rip-rap armoring as not being implementable may or may not ultimately be true and can be considered as speculation at this point. The actual validity of said statement could only be verified after Ecology approval of the FS and CAP.

2. Nicole: "Similarly, I was wondering if you could help me understand the likelihood of the next bit that says MTCA would likely require cap/cover. When we were talking, I was thinking you were saying that there are various approaches and it would depend on what types of contaminants are onsite but this would likely be a voluntary clean up which is slightly different than a required clean up."

Ecology response: Again with reference to the RI-FS-CAP approval process under MTCA and their current RI place within that process, that statement is speculative at this point and as such, it may or may not ultimately be the correct conclusion, likely or otherwise. Your conclusion is correct though regarding our discussion that there are typically several cleanup alternatives that are assessed, compared, and contrasted in the FS against the standard suite of parameters with the alternative that best satisfies the parameters as being the one that is proposed for further development in the CAP.

Hope this answers your questions but feel free to contact me as always for additional discussion/clarification.

V/r,
Joseph B. Hunt, LHG

VCP Project Manager/Hydrogeologist
Southwest Region – Toxics Cleanup Program
Washington Department of Ecology
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From: Nicole Floyd <nfloyd@ci.olympia.wa.us>
Sent: Thursday, June 16, 2022 3:22 PM
To: Hunt, Joe (ECY) <johu461@ECY.WA.GOV>
Subject: West Bay Yards

THIS EMAIL ORIGINATED FROM OUTSIDE THE WASHINGTON STATE EMAIL SYSTEM - Take caution not to open attachments or links unless you know the sender AND were expecting the attachment or the link

Hey Joe,

Since our last conversation I have been digging into the project documents a little. I have found the following section particularly interesting. I was wondering if you could provide some feedback on the conclusions they have drawn here.

reef (CHE 2016). The restoration proposed herein is based on this concept. Additionally, the shoreline restoration project will also provide a clean sediment cap to eliminate or minimize potential aquatic exposures to known chemical constituents in West Bay sediment (e.g., dioxins/furans, polycyclic aromatic hydrocarbons) that may be present near the property.

The nearshore ecosystem and upland areas of the site have ecological and economic significance for the community, and the existing state of the site is degraded. The elements of the voluntary shoreline restoration will facilitate the transition towards enhanced shoreline uses and improve the existing degraded shoreline area. The proposed voluntary restoration would occur through the placement of sand and gravel over the existing riprap. This will lead to 0.77 acres of unavoidable loss of aquatic habitat. Though shoreline restoration by fill placement is not ideal, this is the only feasible restoration option at this site. Because of this history at the site as a cleanup site, beach restoration by excavation into the uplands is not possible without removing existing riprap armoring, which would unacceptably threaten the integrity of the remedial action. Without removing the riprap, the only feasible option for shoreline restoration at the site is the placement of habitat fill over the top of the riprap. With regard to the uplands and maintaining the integrity of the

riprap armoring, installing and maintaining an upland cap/cover will most likely be a requirement of the selected Model Toxics Control Act (MTCA) remedy for the site (Pioneer 2021).

The proposed upland improvements will improve existing site conditions and create a functional use of the property. The proposed use is permitted at the site and will only enhance the property and existing area. Overall, the existing site is degraded and holds areas of sparse low-quality vegetation. The existing use of the site offers no viable ecosystem functions or advantageous services for habitat or the community. The voluntary shoreline restoration and upland improvements will promote ecosystem services and community enhancement, consistent with the goals and objectives of the City's Shoreline Master Program (Appendix A of Olympia SMP) and the Thurston Regional Planning Council's Lacey, Olympia, and Tumwater Shoreline Analysis & Characterization Report (ESA Adolfson 2008).

I am looking mostly at the section that says due to the past clean up – excavation into the uplands is not viable because it would unacceptably threaten the integrity of the remedial action. Is that accurate? Similarly, I was wondering if you could help me understand the likelihood of the next bit that says MTCA would likely require cap/cover. When we were talking, I was thinking you were saying that there are various approaches and it would depend on what types of contaminants are onsite but this would likely be a voluntary clean up which is slightly different than a required clean up.

I also wanted to make sure you knew that the following documents are available:

- Environmental Phase I and II
- Due Diligence Investigation Status Update Memo
- Methane Summary Memo

All of these are available at the following website – scroll to the very bottom:

https://www.olympiawa.gov/news_information/construction_in_olympia/west_bay_yards.php

Nicole Floyd, AICP

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**STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY**

Southwest Region Office

PO Box 47775, Olympia, WA 98504-7775 • 360-407-6300

June 30, 2022

City of Olympia
Attn: Nicole Floyd, Principal Planner
601 4th Ave E
Olympia, WA 98501
Via email: nfloyd@ci.olympia.wa.us

Re: West Bay Yards proposal

Thank you for providing the opportunity to comment on the second round of review for the West Bay Yards proposal. Based on our review of the documents provided on the City's website, we offer the following comments and recommendations, with more details outlined below:

- We recommend that the City require a CUP for the drift sill/groin.
- The current OHWM will require a determination from Ecology and must be depicted on project plans, along with the projected OHWM.
- We recommend that the City require a CUP for any mixed use/non-water-oriented uses within a 100 of the OHWM.
- We recommend that the City ensure it has complete information regarding the contamination at the site and the voluntary cleanup action before issuing a SEPA determination.
- We recommend that the City request additional information from the applicant to demonstrate compliance with the SMP's fill and restoration regulations.
- We recommend that the City request a demonstration of mitigation sequencing for the proposed restoration and that it address specific minimization issues we've identified below.

Drift Sill / Groin

The proposed "drift sill" meets the definition of a groin in the 2018 SMP. Further, the term "drift sill" comes from [WDFW's Marine Shoreline Design Guidelines](#), which define a drift sill as a "low elevation **groin**, typically constructed of rock, installed along with beach nourishment filled up to height of sill which is sometimes used to hold or slow littoral transport of placed sediment" (emphasis added). Groins require a CUP adjacent to the Urban Intensity SED, per SMP Table 7.1. Groins are also considered to be a type of hard armoring, per OMC 18.20.860, and hard armoring also requires a CUP, per SMP Table 7.1. and 18.20.860.A: "Hard structural shoreline stabilization (also referred to as 'hard' armoring) means erosion control measures using hardened structures that armor and stabilize the shoreline from further erosion. Examples of hard armoring include concrete, boulders, dimensional lumber or other materials to construct linear, sometimes vertical, faces. These include bulkhead, rip-rap, **groins**, revetments, **and similar structures**" (emphasis added).

The groin would also be considered as permanent as most other shoreline structures, even if it were to be eventually removed decades later (which can be the end result of many other shoreline structures as

City of Olympia
Attn: Nicole Floyd
June 30, 2022
Page 2 of 5

well). However, whether the groin would be permanent or not is not relevant. The requirement for a CUP is not dependent on whether the structure is permanent.

OHWM

The OHWM is to be determined by the Department of Ecology, per RCW 90.58.030(2)(d). **Please coordinate with me and the applicant to schedule a site visit to make this determination.**

After this determination is made, the figures need to clearly show the Ecology-determined OHWM. For compliance with OMC 18.20.280.B and WAC 173-27-180(9)(b and (c), the applicant will also need to provide a figure that shows the existing OHWM and projected OHWM that may result from the restoration project on one sheet for comparison. This figure needs to include all relevant dimensions.

Regarding the letter from Phillips Burgess to the City dated February 25, 2022, it is correct that the OHWM may change in accordance with permits issued by a local government or the department per RCW 90.58.030(2)(c). However, for this project, we don't know whether or to what extent the OHWM will shift. The restoration proposal is in preliminary form, and the nature of the final approval restoration is uncertain (see issues outlined below that could affect the final restoration proposal). Furthermore, if the OHWM were to shift waterward, it may take several years for the fill to settle and for reliable OHWM indicators to appear.

RCW 90.58.580 and WAC 173-27-215 are not relevant to the present proposal. The purpose of these regulations is only to grant relief from SMP development standards and use regulations in certain narrow circumstances when there is a **landward** shift in the OHWM due to an authorized restoration project. The regulations apply only in urban growth areas, and several other criteria have to be met.

Mixed Use/Non-Water-Oriented Use within 100 feet of OHWM

The applicant is proposing mixed uses and possibly non-water-oriented uses (restaurants/cafes and retail businesses are often not water oriented) within 100 feet of the OHWM. Non-water-oriented uses and mixed uses require a shoreline conditional use permit (CUP) in the Urban Intensity shoreline environment designation within 100' of the OHWM. I understand that the applicant would like to have a condition on the shoreline permit stating that the new OHWM can be used after the restoration project is done to determine whether a CUP would be necessary or not. There are two issues to be aware of concerning the existing site plans under this approach:

1. We do not know at this point whether or to what extent the OHWM will change as a result of the restoration project. See issues outlined below that could affect the proposed location of the OHWM.
2. Some mixed-use development in phase 2 (northeast section of building 3 and pool), is proposed within 100 feet of the existing OHWM and is proposed to occur prior to full implementation of the restoration project.

This doesn't necessarily mean that the proposed development cannot occur; it means that a CUP is necessary to allow the mixed use component within 100 feet of the OHWM.

Model Toxics Control Act Voluntary Cleanup Plan

The majority of the applicant's submittal documents to date that pertain to work at or near the OHWM and in-water work focus on the proposed restoration project. However, there is also a voluntary cleanup plan in development that concerns contaminated sediment within the substrate below the OHWM. The SEPA checklist and JARPA do not appear to mention the contamination or the cleanup. The Technical



City of Olympia
Attn: Nicole Floyd
June 30, 2022
Page 3 of 5

Memorandum from Grette to the City dated February 28, 2022, the subject line of which is “West Bay Yards: No Net Loss and Mitigation Sequencing Narrative,” briefly discusses cleanup. This document states that “... the proposed actions will provide a clean sediment cap to eliminate or minimize potential aquatic exposures to known chemical constituents in West Bay sediment (e.g., dioxins/furans, polycyclic aromatic hydrocarbons) that may be present near the property.” Page 14 of this document explains that an “...upland cap/cover will most likely be a requirement of the selected Model Toxics Control Act (MTCA) remedy for the site...”

The document goes on to specify particular dimensions of material placement for the aforementioned cap/cover. Input from Ecology’s Toxics Cleanup Program indicates that, as part of the Voluntary Cleanup Program, the project proponent is still completing the Remedial Investigation (RI) which will characterize the extent of the contamination. After this is completed, the proponent will then complete a Feasibility Study (FS) to analyze cleanup alternatives and select the preferred alternative. Prior to completion of these documents, presuming the depth, area, or materials that will be needed to satisfactorily address cleanup or containment of the contaminated sediments is premature. The results of these studies could greatly impact the amount of fill necessary and therefore the location of the future OHWM. In order for the City to make an informed decision under SEPA, we recommend that the SEPA checklist and associated documents include information from the RI and FS about the extent of contamination onsite and the preferred cleanup action before a threshold determination is made.

Once the voluntary cleanup plan is prepared according to MTCA requirements, the applicant will need to specify in detail which components of the project pertain to the restoration, the voluntary cleanup, and site development preparation so that these three components can be distinctly addressed during project review.

Restoration Project

The applicant has provided information on its proposed restoration project in the Shoreline Narrative, No Net Loss and Mitigation Sequencing memo, Restoration Mitigation Plan, and other documents. The restoration project must be consistent with all applicable policies and regulations in the City’s shoreline master program, including the following:

18.20.833.A. Fill shall be the minimum necessary to accommodate the proposed use or development or protect it from flooding, and allowed only in conjunction with approved shoreline use and development activities that are consistent with Olympia’s Shoreline Program.

The applicant must demonstrate that the fill is the minimum necessary to achieve the goals of the restoration in order to be consistent with this requirement. See some potential issues with minimization that we’ve identified below under Mitigation Sequencing.

18.20.833.F. Fill for the sole purpose of creating land area is prohibited.

Based on the applicant’s development plans, it appears that the layout is somewhat dependent on a waterward shift in the OHWM, which the applicant expects to be an outcome of the restoration project. Again, the applicant will need to demonstrate that the fill is the minimum necessary for the restoration project.



City of Olympia
Attn: Nicole Floyd
June 30, 2022
Page 4 of 5

18.20.833.K. *Fill shall not be located where shoreline stabilization will be necessary to protect materials placed or removed. Disturbed areas shall be immediately stabilized and revegetated to avoid erosion and sedimentation.*

The applicant is proposing a groin on the south side of the fill in order to retain the fill. This approach is inconsistent with 18.20.830.K.

18.20.855.H: *Restoration and enhancement projects shall be designed, constructed, and maintained to avoid the use of shoreline stabilization measures. Where such measures cannot be avoided, bioengineering shall be used rather than bulkheads or other stabilization measures, unless it can be demonstrated that there are no feasible options to achieve the intended result. Restoration and enhancement projects that include shoreline modification actions shall be authorized provided the primary purpose of such actions is clearly restoration of the natural character and ecological functions of the shoreline.*

The groin that is proposed to retain the gravel and sand fill is a shoreline stabilization measure. The burden of proof is on the applicant to demonstrate that bioengineering is not a feasible option instead of the groin.

18.20.855.I: *Restoration and enhancement projects shall not extend water-ward more than the minimum necessary to achieve the intended result and **shall not result in the creation of additional upland area** (emphasis added).*

The burden of proof is also on the applicant to demonstrate that the restoration project does not extend waterward more than the minimum necessary. In addition, this criterion makes it clear that the creation of additional upland area is not allowed as part of a restoration project.

Mitigation sequencing

Mitigation sequencing is required for the restoration project, per 18.20.800.D: “Shoreline modifications shall not result in the loss of shoreline ecological functions or ecosystem wide processes. All proposals for shoreline modifications shall take measures to avoid or reduce ecological impacts in accordance with the mitigation sequencing priorities set forth in OMC 18.20.410(B).” 18.20.410(B) is the mitigation sequencing section.

In the appeal of the West Bay Yards Development Agreement, the Hearings Examiner’s Order Denying Appellants’ Motion for Summary Judgment and Granting Respondents’ Motion for Summary Judgment, dated February 17, 2021, states that “Both the City and West Bay acknowledge that the Restoration Plan* merely serves as a guide...” (p. 10, lines 8-9). There is no requirement that the project’s restoration plan adhere to the specifics of the City’s Restoration Plan for the site restoration.

Ecology recommends that the applicant examine alternatives to the project-specific restoration plan in order to comply with the SMP’s mitigation sequencing requirements. For example, the letter from Landau Associates to Milestone Companies West Bay Development Group, dated October 29, 2021, looks at the estimated stability of the shoreline slope under existing and proposed conditions. Three conditions were analyzed with the resulting factors of safety (FS):

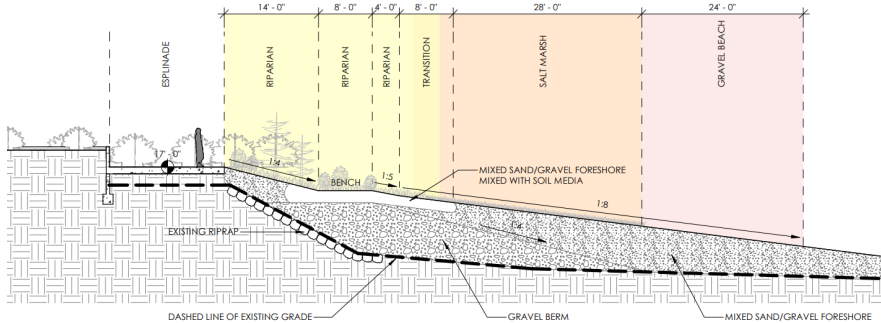


City of Olympia
Attn: Nicole Floyd
June 30, 2022
Page 5 of 5

- Existing slope, static conditions, with riprap (FS = 1.5).
- Existing slope, static conditions, without riprap (FS = 0.7).
- Proposed slope configuration, static conditions (FS = 3.0).

Based on the results of the shoreline slope stability analysis, Landau does not recommend removing riprap, as doing so could undermine the stability of the slope. However, Landau did not look at other options, such as removing the riprap, or just the upper portion of the riprap, and grading a gradual slope landward of the remaining riprap. If this approach is viable, then the fill for the restoration could start at a lower elevation, resulting in less conversion of area below the OHWM to uplands.

There appear to be other opportunities for the applicant to minimize the amount of fill and hence and the amount of area converted to uplands. For example, in the figure below, which is from Sheet A103 of the site plans in the Design Review Packet, the bench is horizontal and extends the fill eight feet waterward. The bench does not appear to advance the goals of the restoration project. This bench could be eliminated, shifting the transition zone, salt marsh, and gravel beach landward. This would minimize fill and reduce impacts to the aquatic environment.



*City of Olympia West Bay Environmental Restoration Assessment Final Report, by Coast & Harbor Engineering et al, February 26, 2016

Planting Requirements

Depending on what is ultimately authorized in terms of riprap (e.g., retention, removal, partial removal), trees should be specified for planting only outside of areas where remaining riprap underlies the soil within the area of expected root growth.

Please let me know if you have any questions or would like to discuss these comments.

Sincerely,

Rebecca Rothwell
Rebecca Rothwell
Shoreline Planner

cc: Sonia Wolfman, Assistant Attorney General
Maria Sandercock, Ecology
Zach Meyer, Ecology

