

Staff Response to CTTA hearing presentation document and Feb 26, 2021 letter:

The County would agree to remove the last sentence of condition number 20 as listed in the staff report because the management agreement and the recorded conservation easement can be satisfied with one document. CTTA has indicated they will provide the County with an amended Campground Recreational and Building Handbook (CRBH) establishing the restricted allowed uses of trails within the new expanded buffer. This information will be added to condition number 20 as a requirement.

Condition number 21 timeframe would remain as listed in the staff report. The County cannot accept the proposal to authorize any development before the conservation easement is recorded. It can be clarified in the condition that the recorded easement can be similar to the draft conservation covenant Ecology document as attached to the February 26, 2021 letter from CTTA.

For condition number 22 & 23, the county would consider modification to these conditions based on the submitted alternative planting plan in CTTA's hearing presentation document. Planting areas 1 & 2 shall be planted prior to authorizing any development, along with monitoring requirements for these plantings such as annual reports; the remaining planting areas (3, 4 & 5) are to be completed following the phased schedule within the first permit timeframe. For the county to recommend an approval of the project, the project has to ensure "no net loss" and mitigation-sequencing rationale. If any development were to begin before the applicant complete the mitigation (or at least one phase of it), then project has gone from avoiding/minimizing the impact up front to rectifying/reducing/compensating for the impact afterwards which does not follow the mitigation-sequencing rationale.

The County would agree to replace condition number 24 to read as follows: "Prior to future development of any of the camping lots located within the 100-year floodplain, the individual camping lot members at the time of requested development shall submit a flood development permit application for the development and comply with LCC 15.35."

To answer the clarifying question from CTTA's February 26, 2021 letter about camping lots that already exceed the proposed maximum coverage: If the camping lot already exceeds the maximum coverage, the county would not agree to issue new building permits or agree for CTTA issued structures be allowed to be constructed even underneath an existing cover, until the camping lot comes into and stay in compliance. The County will clarify condition 2 from the staff report, by adding the following sentence to end of condition number 2: "If the camping lot already exceeds the maximum coverage, no new building permits shall be issued nor shall CTTA issued structures be allowed to be constructed even underneath an existing cover, until the camping lot comes into and stays in compliance with the maximum coverage established in this programmatic shoreline permit (SHD19-0009)."

Modified Conditions of Approval – Replacing Conditions 2, 20, 21, 22, 23, 24 of the Staff Report with the following:

2. Camping lots with existing structures exceeding the currently proposed camping lot's maximum allowed coverage are allowed to retain existing structures (as long as they are not already indicated as non-compliant structures on Table 1 of Appendix C, Staff Exhibit 2) but cannot expand the structures or build new structures. If existing structures are demolished due to damage or any other reason, they may not be reconstructed if the reconstruction would result in camping lot coverage over the allowed amount. If the camping lot already exceeds the maximum coverage, no new building permits shall be issued nor shall CTTA issued structures

be allowed to be constructed even underneath an existing cover, until the camping lot comes into and stays in compliance with the maximum coverage established in this programmatic shoreline permit (SHD19-0009).

20. Prior to future development of any of the 258 camping lots within the shoreline jurisdiction, the portion of the trail system that would be located in the new expanded shoreline buffer area shall be closed to all uses except for walking and non-motorized bike riding, and CTTA shall provide the Lewis County Community Development and Ecology with an amended Campground Recreational and Building Handbook (CRBH) establishing the restricted allowed uses of trails within the new expanded buffer.
21. Prior to future development of any of the 258 camping lots within the shoreline jurisdiction, CTTA shall record in the Lewis County Auditor's records an expanded shoreline buffer area permanent conservation easement on parcels 028128000000, 028127000000, 028127001000 and 028126000000 for permit mitigation (SHD19-0009). A copy of the recorded conservation easement shall be provided to Lewis County Community Development and Ecology. The recorded easement shall be similar to the draft conservation covenant Ecology document (Hearing Exhibit ____).
22. Prior to future development of any of the 258 camping lots within the shoreline jurisdiction, CTTA shall plant Restoration Areas 1 & 2 of the phased restoration schedule in Fall 2021 and Spring 2022 as shown on Hearing Exhibit _____. The planting of Restoration Areas 3, 4 & 5 will continue as shown on the phased restoration schedule with planting occurring in Fall 2023. The performance standards of the full 6.87 acres of restoration as identified in Staff Exhibit 2, Appendix D – Shoreline Mitigation Plan composed of planting areas 1 through 5 and the phased timing schedule shown on Hearing Exhibit ____ shall be achieved by the December 31, 2027.
23. CTTA shall provide monitoring reports to Lewis County Community Development and Ecology as outlined in the phased restoration schedule as shown in Hearing Exhibit ____ with the first monitoring report due June 30, 2022. Failure of CTTA Management to provide monitoring reports as identified in the phase schedule will be considered a violation of permit approval.
24. Prior to future development of any of the camping lots located within the 100-year floodplain, the individual camping lot members at the time of requested development shall submit a flood development permit application for the development and comply with LCC 15.35.