

A Shoreline Substantial Development Permit Narrative for CJ Dens Subdivision

Date: November 2020

Submitted to: City of Camas
Community Development
616 NE 4th Avenue
Camas, WA 98607

Applicant: CJ Dens Lacamas II LLC
PO Box 2239
Kalama, WA 98625

AKS Job Number: 5504



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Shoreline Substantial Development Permit Application for CJ Dens Subdivision

Submitted to:	City of Camas Community Development 616 NE 4 th Avenue Camas, WA 98607
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Site Location:	715 SE Leadbetter Road Camas, WA 98607 Parcel #: 177906-000, 178172-000, and 178236-000
Site Size:	49.62 Acres (2,161,423 SF)
Land Use Districts:	R-7.5 (Single-Family Residential)



I. Executive Summary

Through this application, CJ Dens Lacamas II, LLC (Applicant) requests approval from the City of Camas (City) to subdivide the subject site, described below, into 152 single-family lots for the future construction of detached single-family homes. The site is located at the east end of Lacamas Lake, on the north side of SE Leadbetter Road and is addressed 715 SE Leadbetter Road, Camas, WA 98607. The site is identified as Clark County Parcels 177906-000, 178172-000, and 178236-000. The development will gain access from SE Leadbetter Road and N Adams Street and will provide access to the individual lots with an internal street network. Future circulation will be provided to the north, to connect to the future arterial in the City of Camas Six Year Transportation Improvement Program. The Applicant will also ensure protection of the existing critical areas on site, including two streams and a wetland, as well as the shoreline buffer for Lacamas Lake. The applicant will also provide a trail parallel to SE Leadbetter road, which is identified as a portion of the T-3 trail in the City of Camas Park, Recreation, and Open Space (PROS) Plan.

In addition to this narrative, the application package includes the materials necessary for the City to review and approve this submittal, including Preliminary Plans, Stormwater Technical Information Report (TIR), updated Geotechnical Site Investigation Report, updated Traffic Impact Study, updated Wetland and Habitat Report, and an amended State Environmental Policy Act (SEPA) checklist.

The highlights of this project that will be discussed further in this narrative include:

- Platting of 152 single-family lots.
- Construction of the public internal street network for lot access and circulation.
- Construction of a multi-use path based on the PROS Plan.
- Protection of existing critical areas and central open space.
- Construction of an overlook to provide views of Lacamas Lake and the surrounding hills.
- Common parking areas throughout the development for additional guest parking.
- Construction of water, sanitary sewer, and stormwater utilities for the development.
- Construction of water transmission line from south boundary to north boundary.

The project is to be constructed in a maximum of 3 phases as follows:

- Phase 1 – Construct 51 lots with development access from SE Leadbetter Road, create the large central open space, construct the multi-use trail, and construct necessary roadways and utilities.
- Phase 2 – Construct 64 lots and the development access from N Adams Street, construct the overlook, and construct necessary roadways and utilities.
- Phase 3 – Construct 37 lots and the remaining roadways and utilities.

The written narrative includes findings of fact demonstrating that the application complies with all applicable approval criteria. These findings are supported by substantial evidence, including Preliminary Plans and other written documentation. This information, which is included in this application package, provides the basis for the City to approve the application.

II. Site Description/Setting

The subject site consists of three parcels and is ±49.62 acres in size. The site is addressed as 715 SE Leadbetter Road, Camas, WA 98607. The included properties are identified as Clark County Parcel Number 177906-000 of the northeast ¼ of Section 34 and Parcel Numbers 178172-000 and 178236-000 of the northwest ¼ of Section 35, Township 2 North, Range 3 East, Willamette Meridian. The site is zoned Residential – 7.5 (R-7.5) with an Airport Overlay. Neighboring properties are zoned R-7.5 and Business Park to the north, R-7.5 to the northeast and southeast, Community Commercial to the east and west, and Residential – 12 (R-12), Parks/Open Space (P/OS), and Water to the south. Properties to the north and northeast are vacant. The property to the east is in use as large-lot residential and the properties to the southeast are in use as single-family residential. One property to the south across SE Leadbetter Road is in use as large-lot residential, with the remaining parcels south of the site covered by Lacamas Lake. The property to the west is in use as large-lot residential and the Camas Washougal-Wildlife League clubhouse.

The site has frontage on SE Leadbetter Road along the south boundary and N Adams Street is stubbed to the site from the south, in the east portion of the site. SE Leadbetter road is classified as an existing 2-lane local road without sidewalk, curb, or gutter. Frontage improvements are not proposed for SE Leadbetter road because the City plans to close the road to vehicle traffic west of the site in the future. N Adams Street is classified as a 2 Lane Local/Sprinklered (52-foot right-of-way (ROW)) and will be extended into the site.

The site is hilly with steep slopes in the south and northeast portions of the site. The site generally slopes from north to south, with a small portion in the northwest sloping from southeast to northwest into a valley containing a wetland and stream. Shallow bedrock exists throughout the site, with a few rock outcroppings on site. The existing vegetation on site consists of stands of evergreen trees interspersed deciduous trees along the north, south, west, and portions of the east boundary, as well as a stand in the south-central portion of the site. Shrubs and grasses make up the remainder of the vegetation on site. A wetland is located in the northeast portion of the site and continues off site to the northwest. An unnamed stream, classified as a Type Np stream by the Washington State Department of Natural Resources (DNR) Water Typing System, flows through the wetland from the northeast to the southwest, and generally follows the north property line. There is also an unnamed Type Ns stream in the southeast corner of the site, flowing from off site, southwesterly across the site. Both streams cross under SE Leadbetter Road and drain to Lacamas Lake. The Clark County GIS archaeological predictive model ranges from Low-Moderate to High across the site. The site is not within a City of Camas mapped critical aquifer recharge area (CARA).

III. Applicable Review Criteria

CITY OF CAMAS SHORELINE MASTER PROGRAM

CHAPTER 2 APPLICABILITY, SHORELINE PERMITS AND EXEMPTIONS

To be authorized, all uses and development activities in shorelines shall be carried out in a manner consistent with this Program and the policy of the Act as required by RCW 90.58.140(1), regardless of whether a shoreline permit, statement of exemption, shoreline variance, or shoreline conditional use is required.

2.1 Applicability

1. This Program shall apply to all of the shorelands and waters within the City of Camas that fall under the jurisdiction of RCW 90.58. Such shorelands shall include those lands extending two hundred (200) feet in all directions as measured on a horizontal plane from the ordinary high water mark (OHWM), floodways and contiguous floodplain areas landward two hundred feet from such floodways, associated wetlands, critical areas with associated buffer areas, river deltas associated with the streams, and lakes and tidal waters that are subject to the provisions of this program, as may be amended; the same to be designated as to location by Ecology, as defined by RCW 90.58.

Within the City of Camas the following waters are considered “shorelines” and are subject to the provisions of this Program: Lacamas Creek; Fallen Leaf Lake; Lacamas Lake; and Round Lake. The Columbia and Washougal Rivers are further identified as shorelines of statewide significance. A copy of the *Camas Shoreline Designations Map* and its UGA is shown in Appendix A.

The City is pre-designating shorelines within its adopted UGA. Until annexation occurs, all development in these areas will continue to be regulated by the Clark County Shoreline Master Program. The City’s SMP will apply concurrent with annexation and no additional procedures are required by Ecology at the time of annexation (WAC 173-26-150) unless a re-designation is occurring as specified per Table 4-1 of this Program.

Response: The subject site is located on the north side of SE Leadbetter Road, across from Lacamas Lake, which is a shoreline of the state, and falls within the 200-foot Urban Conservancy shoreline. Therefore, the Shoreline Master Program applies.

2.2 Shoreline Substantial Development Permit Required

Response: This application is for a 152-lot subdivision on a site within the shoreline jurisdiction for Lacamas Lake. A Shoreline Substantial Development Permit is required.

CHAPTER 3 SHORELINE MASTER PROGRAM GOALS AND POLICIES

3.1 General Shoreline Goals

The general goals of this Program are to:

- Use the full potential of shorelines in accordance with the opportunities presented by their relationship to the surrounding area, their natural resource values, and their unique aesthetic qualities offered by water, topography, and views; and

Response: This application is for a 152-lot subdivision within the shoreline jurisdiction for Lacamas Lake. The site is on the opposite side of SE Leadbetter Road from the lake, creating a physical separation of the site from the lake. The shoreline does provide unique aesthetic qualities and views. The development also protects mature trees within the shoreline jurisdiction to maintain the natural separation of the neighborhood and the shoreline to maintain the aesthetic qualities of the shoreline and help maintain the views of the shoreline.

- Develop a physical environment that is both ordered and diversified and which integrates water and shoreline uses while achieving a net gain of ecological function.

Response: The Lacamas Lake shoreline along the site frontage contains existing SE Leadbetter Road and an existing sanitary sewer pump station, reducing ecological function of the shoreline. The development will provide two large natural area tracts along SE Leadbetter Road adjacent to the shoreline which will help protect the existing ecological function of the shoreline. The development will also construct a portion of the T-3 trails as identified in the City of Camas Parks, Recreation and Open Space (PROS) Plan. The trail section will provide additional access to the shoreline's aesthetic value.

3.2 Shorelines of Statewide Significance

Within the City of Camas, the Columbia River and the Washougal River are designated shorelines of statewide significance (SSWS). Shorelines of statewide significance are of value to the entire state. In accordance with RCW 90.58.020, SSWS will be managed as follows:

Response: The site is not within the shoreline jurisdiction for the Columbia River or Washougal River, this section does not apply.

3.3 Archaeological, Historic, and Cultural Resources

3.3.1 Goal

The goal for archaeological, historic, and cultural resources is to preserve and prevent the destruction of or damage to any site having historic, cultural, scientific, or educational value. Such sites include those identified by affected Indian tribes, the Department of Archaeology and Historic Preservation, Clark County Historic Preservation Commission, and other appropriate authorities.

Response: Archaeological Investigations Northwest, Inc (AINW) completed an archaeological predetermination on site as part of the originally approved subdivision application (SUB10-03). As part of the predetermination it was determined that no additional archaeological work would be required on site. If additional archaeological materials are discovered during construction, appropriate measures to protect these resources will be taken.

3.4 Conservation

3.4.1 Goal

The goal of conservation is to protect shoreline resources, vegetation, important shoreline features, shoreline ecological functions and the processes that sustain them to the maximum extent practicable.

Response: The development will provide two large natural area tracts along SE Leadbetter Road adjacent to the shoreline which will help protect the existing ecological function of the shoreline. The development will also construct a portion of the T-3 trails as identified in the City of Camas Parks, Recreation and Open Space (PROS) Plan. The trail section will provide additional access to the shoreline's aesthetic value.

3.5 Economic Development

3.5.1 Goal

The goal for economic development is to create and maintain an economic environment that is balanced with the natural and human environment.

Response: The proposed project will allow for the economic development of the site while provided tracts to protect critical areas and native mature vegetation on site and within the shoreline jurisdiction.

3.6 Flood Prevention and Flood Damage Minimization

3.6.1 Goal

The goal for flood hazards is to promote public health, safety, and general welfare, and to minimize public and private losses due to flood conditions in specific areas.

Response: The proposed lots and roads are generally to be constructed outside of the shoreline jurisdiction and no portion of the site is within a flood plain. The development will also provide tracts to protect critical areas and mature native vegetation, as well as collecting, treating, and detaining stormwater to help prevent potential flooding.

3.7 Public Access and Recreation

3.7.1 Goal

The goal of public access and recreation is to increase the ability of the general public to enjoy the water's edge, travel on the waters of the state, and to view the water and the shoreline from adjacent locations.

Response: The development will provide two large natural area tracts along SE Leadbetter Road adjacent to the shoreline which while help protect the existing ecological function of the shoreline. The development will also construct a portion of the T-3 trails as identified in the City of Camas Parks, Recreation and Open Space (PROS) Plan. The trail section will provide additional access to the shorelines aesthetic value. No existing public or recreational access to the lake will be negatively impacted by the development.

3.8 Restoration

3.8.1 Goal

The goal of restoration is to re-establish, rehabilitate and/or otherwise improve impaired shoreline ecological functions and/or processes through voluntary and incentive-based public and private programs and actions that are consistent with the SMP Restoration Plan and other approved restoration plans.

Response: Restoration of the shoreline is not proposed with this project. The development will provide two large natural area tracts along SE Leadbetter Road adjacent to the shoreline which while help protect the existing ecological function of the shoreline.

3.9 Shoreline Modification and Stabilization

3.9.1 Goal

The goal for shoreline modification and stabilization is to avoid or minimize the need for shoreline armoring along shorelines of the state, and when it is necessary, achieve it in a way that best protects ecosystem processes, shoreline functions, and downstream properties. Shoreline stabilization activities should also be reviewed in balance with the provisions of Section 3.6 - Flood Prevention and Flood Damage Minimization of this Program.

Response: Restoration of the shoreline is not proposed with this project.

3.10 Shoreline Use and Development

3.10.1 Goal

The goal for shoreline use and development is to balance the preservation and development of shorelines in a manner that allows for mutually compatible uses. Resulting land use patterns will be compatible with shoreline designations and sensitive to and compatible with ecological systems and other shoreline resources. To help with this balance, shoreline and water areas with unique attributes for specific long term uses such as commercial, residential, industrial, water, wildlife, fisheries, recreational and open space shall be identified and reserved.

Response: The subject site is within the Urban Conservancy shoreline jurisdiction, which allows for the development of single family residential. The development will provide two large natural area tracts along SE Leadbetter Road adjacent to the shoreline which will help protect the existing ecological function of the shoreline. The development will also construct a portion of the T-3 trails as identified in the City of Camas Parks, Recreation and Open Space (PROS) Plan. The trail section will provide additional access to the shorelines aesthetic value.

3.11 Transportation, Utilities, and Essential Public Facilities

3.11.1 Goal

The goal for transportation, utilities, and essential public facilities is to provide for these facilities in shoreline areas without adverse effects on existing shoreline use and development or shoreline ecological functions and/or processes.

Response: SE Leadbetter Road runs through the Lacamas Lake shoreline jurisdiction and fronts the subject site. As part of the development, no improvements are proposed to SE Leadbetter Road because the City will be permanently closing the road to vehicle traffic at some point west of the subject site in the near future.

3.12 Views and Aesthetics

3.12.1 Goal

The goal for views and aesthetics is to assure that the public's opportunity to enjoy the physical and aesthetic qualities of shorelines of the state, including views of the water, is protected to the greatest extent feasible.

Response: The development will provide two large natural area tracts along SE Leadbetter Road adjacent to the shoreline which will help protect the existing ecological function of the shoreline. The development will also construct a portion of the T-3 trails as identified in the City of Camas Parks, Recreation and Open Space (PROS) Plan. The trail section will provide additional access to the shorelines aesthetic value.

3.13 Water Quality and Quantity

3.13.1 Goal

The goal for water quality and quantity is to protect and enhance the quality and quantity of the region's water resources to ensure there is safe, clean water for the public's needs and enjoyment; and protect wildlife habitat.

Response: The proposed lots and roads are generally to be constructed outside of the shoreline jurisdiction and no portion of the site is within a flood plain. The development will also provide tracts to protect critical areas and mature native vegetation, as well as collecting, treating, and detaining stormwater prior to releasing it.

CHAPTER 4 SHORELINE DESIGNATIONS

4.3 Shoreline Designations

The City classification system consists of shoreline designations that are consistent with and implement the Act (RCW 90.58), the Shoreline Master Program Guidelines (WAC 173-26) and the City of Camas Comprehensive Plan. These designations have been assigned consistent with the corresponding criteria provided for each shoreline designation. In delineating shoreline 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 five shoreline designations are:

- Aquatic;
- Natural;
- Urban Conservancy;
- Medium Intensity; and
- High Intensity

4.3.3 Urban Conservancy Shoreline Designation

Response: According to the Camas Shoreline Designations Map dated August 24, 2012, the subject site is within the Urban Conservancy shoreline jurisdiction.

4.3.3.1 Purpose

The purpose of the “Urban Conservancy” shoreline designation is to protect and restore ecological functions of open space, floodplains, and other sensitive lands, where they exist in urban and developed settings, while allowing a variety of compatible uses.

Response: The Urban Conservancy shoreline jurisdiction allows for the development of single family residential. The development will provide two large natural area tracts along SE Leadbetter Road adjacent to the shoreline which will help protect the existing ecological function of the shoreline. The development will also construct a portion of the T-3 trails as identified in the City of Camas Parks, Recreation and Open Space (PROS) Plan. The trail section will provide additional access to the shoreline's aesthetic value. The subject site is outside of the flood plain and SE Leadbetter Road is an existing road that separates the site from the Lacamas Lake shoreline.

CHAPTER 5 GENERAL SHORELINE USE AND DEVELOPMENT REGULATIONS

5.1 General Shoreline Use and Development Regulations

1. Shoreline uses and developments that are water-dependent shall be given priority.

Response: The shoreline for Lacamas Lake adjacent to the subject site is a steep slope immediate off the shoulder of SE Leadbetter road. No water access or water depended uses are available adjacent to the site. The development will construct a portion of the T-3 trail near SE Leadbetter Road that will provide views of the water from the subject site. This standard is met.

2. Shoreline uses and developments shall not cause impacts that require remedial action or loss of shoreline functions on other properties.

Response: The shoreline is located on the south side of SE Leadbetter Road and the subject site is located on the north side. No impacts will be caused by the development. This standard is met.

3. Shoreline uses and developments shall be located and designed in a manner such that shoreline stabilization is not necessary at the time of development and will not be necessary in the future for the subject property or other nearby shoreline properties unless it can be demonstrated that stabilization is the only alternative to protecting public safety and existing primary structures.

Response: The shoreline is located on the south side of SE Leadbetter Road and the subject site is located on the north side. No shoreline stabilization will be required with this development. This standard is met.

4. Land shall not be cleared, graded, filled, excavated or otherwise altered prior to issuance of the necessary permits and approvals for a proposed shoreline use or development to determine if environmental impacts have been avoided, minimized and mitigated to result in no net loss of ecological functions.

Response: No work will be done within the shoreline jurisdiction prior to approval of this shoreline substantial development permit. This standard will be met.

5. Single family residential development shall be allowed on all shorelines except the Aquatic and Natural shoreline designation, and shall be located, designed and used in accordance with applicable policies and regulations of this Program.

Response: The proposed application is for the development of a 152-lot subdivision within the Urban Conservancy shoreline designation. The proposed project will meet the requirement of the City of Camas Shoreline Master Program. This standard is met.

6. Unless otherwise stated, no development shall be constructed, located, extended, modified, converted, or altered or land divided without full compliance with CMC Title 17 Land Development and CMC Title 18 Zoning.

Response: The proposed application will be reviewed and approved by the City following the Type III Subdivision review process to determine that the proposed project will meet the requirement of CMC Titles 17 and 18. This standard will be met.

7. On navigable waters or their beds, all uses and developments should be located and designed to: (a) minimize interference with surface navigation; (b) consider impacts to public views; and (c) allow for the safe, unobstructed passage of fish and wildlife, particularly species dependent on migration.

Response: Lacamas Lake is not designated as navigable water. This standard does not apply.

8. Hazardous materials shall be disposed of and other steps be taken to protect the ecological integrity of the shoreline area in accordance with the other policies and regulations of this Program as amended and all other applicable federal, state, and local statutes, codes, and ordinances.

Response: The proposed project does not contain any know hazardous materials. Any hazardous materials found on site during construction will be disposed on properly. Grading for the proposed project will require blasting of bed, which will follow all local, state, or federal regulations to ensure that no hazardous material leaves the site and is disposed of appropriately. This standard is met.

9. 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: The propose project will not require any in-water work. This standard does not apply.

10. The applicant shall demonstrate all reasonable efforts have been taken to avoid, and where unavoidable, minimize and mitigate impacts such that no net loss of critical area and shoreline function is achieved. Applicants must comply with the provisions of Appendix C with a particular focus on mitigation sequencing per Appendix C, Section 16.51.160 *Mitigation Sequencing*. Mitigation Plans must comply with the requirements of Appendix C, Section 16.51.170 *Mitigation Plan Requirements*, to achieve no net loss of ecological functions.

Response: The application proposed three large natural area tracts to project on-site critical areas, include a wetland, Type Np stream, and Type Ns stream, and project existing native mature vegetation. A Critical Areas Report is included with this application for review and approval by the City. This standard is met.

11. The effect of proposed in-stream structures on bank margin habitat, channel migration, and floodplain processes should be evaluated during permit review.

Response: The project does not propose in-stream structures. This standard does not apply.

12. Within urban growth areas, Ecology may grant relief from use and development regulations in accordance with RCW 90.58.580, and requested with a shoreline permit application.

Response: No relief from development regulations are requested with this application.

5.2 Archaeological, Cultural and Historic Resources

When a shoreline use or development is in an area known or likely to contain archaeological artifacts as indicated on the *City of Camas Archaeological Probability* map, or as recorded at the state or county historical offices, then the applicant shall provide for a site inspection and evaluation by a professional archaeologist. Development permits may not be issued until the inspection and evaluation have been completed and the city has issued approval. If an item of possible archeological interest is discovered on site, all work shall immediately cease and notification of such a find will be sent to the City, the Office of Archaeology and Historic Preservation, and affected Native American tribes. Activities on site may resume only upon receipt of the City's approval.

Response: Archaeological Investigations Northwest, Inc (AINW) completed an archaeological predetermination on site as part of the originally approved subdivision application (SUB10-03). As part of the predetermination it was determined that no additional archaeological work would be required on site. If additional archaeological materials are discovered during construction, appropriate measures to protect these resources will be taken.

5.3 Critical Areas Protection

Critical Areas Regulations are found in Appendix C of this program, and are specifically at Chapters 16.51 through 16.61. Provisions of the Critical Areas Regulations that are not consistent with the Shoreline Management Act, RCW Chapter 90.58, and supporting Washington Administrative Code chapters shall not apply in shoreline jurisdiction. These regulations are integral and applicable to this Program, except that:

Response: The application proposed three large natural area tracts to project on-site critical areas, include a wetland, Type Np stream, and Type Ns stream, and project existing native mature vegetation. A Critical Areas Report is included with this application for review and approval by the City. This standard is met.

5.3.1 Applicable Critical Areas

For purposes of this Program, the following critical areas, as defined in Appendix C 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 application proposed three large natural area tracts to project on-site critical areas, include a wetland, Type Np stream, and Type Ns stream, and project existing native mature vegetation. A Critical Areas Report is included with this application for review and approval by the City. The subject site has historic landslide areas on site. Multiple geotechnical reports are included in the application and a geotechnical engineer will be on site during construction to ensure slope stability. This standard is met.

5.3.2 General Provisions

1. 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.
2. Provisions of the Critical Areas Regulations that are not consistent with the Shoreline Management Act Chapter, 90.85 RCW, and supporting Washington Administrative Code chapters shall not apply in shoreline jurisdiction.
3. Where appropriate, new or redevelopment proposals shall integrate protection of wetlands, fish and wildlife habitat, and flood hazard reduction with other stream management provisions, such as retention of channel migration zones, to the extent they are within the shoreline jurisdictional area to ensure no net loss of ecological functions.
4. Critical areas within the shoreline jurisdiction shall be regulated for any use, development or activity, as provided in accordance with this Program, and Appendix C, whether or not a permit or written statement of exemption is required.
5. If provisions of Appendix C and other parts of this Program conflict, the provisions most protective of ecological and historic resources shall apply.

6. Unless otherwise stated, critical area buffers shall be protected and/or enhanced in accordance with this Program and Appendix C. These provisions do not extend the shoreline jurisdiction beyond the limits specified in this Program as defined in Section 2.1 Applicability.
7. In addition to compensatory mitigation, unavoidable adverse impacts may be addressed through restoration efforts.

Response: The application proposed three large natural area tracts to project on-site critical areas, include a wetland, Type Np stream, and Type Ns stream, and project existing native mature vegetation. The buffers for the wetland will be modified, as allowed by the Camas Municipal Code (CMC). A Critical Areas Report and Buffer Modification Plan are included with this application for review and approval by the City. This standard is met.

5.4 Flood Prevention and Flood Damage Minimization

Response: The subject site is not within the flood plain. This standard does not apply.

5.5 Public Access

1. Provisions for adequate public access shall be incorporated into all shoreline development proposals that involve public funding unless the proponent demonstrates public access is not feasible due to one or more of the provisions of Section 5.5 Regulation 2.a-e.

Response: The proposed project will not involve public funding. Direct public access cannot be provided to the shoreline due to the site being separated from the shoreline by SE Leadbetter Road. The development will construct a portion of the T-3 trail that will provide visual access to the shoreline and lake from the site. This standard is met.

2. Provisions for adequate public access shall be incorporated into all land divisions and other shoreline development proposals, unless this requirement is clearly inappropriate to the total proposal. The nexus, proportionality, need and support for such a connection shall be based on the policies of this Program. Public access will not be required where the proponent demonstrates one or more of the following:

Response: Direct public access cannot be provided to the shoreline due to the site being separated from the shoreline by SE Leadbetter Road. The development will construct a portion of the T-3 trail that will provide visual access to the shoreline and lake from the site. This standard is met.

3. Public access sites shall be connected to a barrier free route of travel and shall include facilities based on criteria within the Americans with Disabilities Act Accessibility Guidelines.

Response: Direct public access cannot be provided to the shoreline due to the site being separated from the shoreline by SE Leadbetter Road. The development will construct a portion of the T-3 trail that will provide visual access to the shoreline and lake from the site. The proposed trail will be designed to meet the requirements of the Americans with Disabilities Act (ADA). This standard is met.

4. Public access shall include provisions for protecting adjacent properties from trespass and other possible adverse impacts to neighboring properties.

Response: The proposed T-3 trail will connect to the existing sidewalk at the SE Leadbetter Road and N Adams Street on the east side of the project. The trail will temporarily end at the west site boundary and will eventually extend to the west on City owned property. The trail will be located downhill from all private property and will be separated by slopes that will help prevent trespass. Private properties will also have privacy fenced installed along the rear yard to provide separation. This standard is met.

5. A sign indicating the public's right of access to shoreline areas shall be installed and maintained in conspicuous locations.

Response: Direct public access cannot be provided to the shoreline due to the site being separated from the shoreline by SE Leadbetter Road. Therefore, signs will not be installed.

6. Required public access shall be developed at the time of occupancy of the use or activity.

Response: The T-3 trail will be constructed during subdivision construction as required by the City. This standard will be met.

7. Public access shall consist of a dedication of land or a physical improvement in the form of a walkway, trail, bikeway, corridor, viewpoint, park, deck, observation tower, pier, boat launching ramp, dock or pier area, or other area serving as a means of view and/or physical approach to public waters and may include interpretive centers and displays.

Response: Direct public access cannot be provided to the shoreline due to the site being separated from the shoreline by SE Leadbetter Road.

8. Public access easements and permit conditions shall be recorded on the deed of title and/or on the face of a plat or short plat as a condition running contemporaneous with the authorized land use, as a minimum. Said recording with the County Auditor's Office shall occur at the time of permit approval.

Response: The T-3 will be constructed within tracts that will be owned by the private homeowners' association. An easement will be granted to the City of Camas for the trail that will provide public access to the trail and views of the shoreline. This standard is met.

9. Future actions by the applicant, successors in interest, or other parties shall not diminish the usefulness or value of the public access provided.
10. Maintenance of the public access facility shall be the responsibility of the owner unless otherwise accepted by a public or non-profit agency through a formal agreement approved by the Shoreline Administrator and recorded with the County Auditor's Office.

5.6 Restoration

Response: The proposed application will not have impacts to the existing shoreline. Therefore, there will be no restoration required related to the project. This standard does not apply.

5.7 Site Planning and Development

5.7.1 General

1. Land disturbing activities such as grading and cut/fill shall be conducted in such a way as to minimize impacts to soils and native vegetation.

Response: The Applicant will submit an Erosion Control plan for approval by the City and install approve erosion control best management practices (BMPs) prior to beginning site

grading. Grading near the shoreline jurisdiction will be kept as minimal as possible and generally be limited to grading for the T-3 trail and some home sites.

2. Impervious surfaces shall be minimized to the extent feasible so as not to jeopardize public safety.

Response: Impervious surfaces created by the development will include roads, sidewalks, houses, and driveways. The total impervious surface for the site will be ±20.90 acres, or 42% of the site. Large natural area tracts, landscape planter island, and open space tracts will help break up the impervious surfaces and stormwater collection, treatment, and detention systems will protect the home sites, neighboring properties, and the shoreline. This standard is met.

3. When feasible, existing transportation corridors shall be utilized.

Response: The subject site has frontage along, and will gain access from, existing SE Leadbetter Road. No frontage improvements are proposed for SE Leadbetter Road. The intersection of proposed N Elk Drive with SE Leadbetter Road and a small portion of N Elk Drive will be constructed within the shoreline jurisdiction to provide primary access to the site. This standard is met.

4. Vehicle and pedestrian circulation systems shall be designed to minimize clearing, grading, alteration of topography and natural features, and designed to accommodate wildlife movement.

Response: The intersection of N Elk Drive has been located to minimize the grading and vegetation removal for the site. The proposed T-3 trail section is located to minimize the grading required to construct the ADA trail. See the Preliminary Plans included with this application for more information. This standard is met.

5. Parking, storage, and non-water dependent accessory structures and areas shall be located landward from the OHWM and landward of the water-oriented portions of the principle use.

Response: Parking and storage will generally be located on individual private lots and not for public use. All these areas will be located landward of the shoreline to the greatest extent practicable. The majority of the lots are located outside of the shoreline jurisdiction. This standard is met.

6. Trails and uses near the shoreline shall be landscaped or screened to provide visual and noise buffering between adjacent dissimilar uses or scenic areas, without blocking visual access to the water.

Response: The proposed T-3 trail section will be screened from SE Leadbetter Road by existing mature trees along the north side of the road. The trail will also be located in large natural area tracts within the development and will be separated from the private lots with grade, fencing, and natural vegetation and this standard is met.

7. Elevated walkways shall be utilized, as appropriate, to cross sensitive areas such as wetlands.

Response: No elevated walkways are proposed with this application. This standard does not apply.

8. Fencing, walls, hedges, and similar features shall be designed in a manner that does not significantly interfere with wildlife movement.

Response: The proposed application will provide three large open space tracts that will have large open section that will allow for the movement of wildlife. Some fencing of the private lots will occur along portion of the natural areas but will not fully enclose any natural areas. This standard is met.

9. Exterior lighting shall be designed, shielded and operated to: a) avoid illuminating nearby properties or public areas; b) prevent glare on adjacent properties, public areas or roadways; c) prevent land and water traffic hazards; and d) reduce night sky effects to avoid impacts to fish and wildlife.

Response: Proposed lighting will be limited to required street lighting within the development and typical private lot residential lighting. All private lots adjacent to the shoreline will direct light away from the shorelines and shielded to prevent light pollution. This standard is met.

10. Utilities shall be located within roadway and driveway corridors and rights-of-way wherever feasible.

Response: Proposed utilities within the shoreline jurisdiction will be located within the roadway. Within the development, some utilities will run through private tracts due to grade restrictions, and easements will be granted to the City for these areas. This standard is met.

11. A use locating near a legally established aquaculture enterprise, including an authorized experimental project, shall demonstrate that such use would not result in damage to or destruction of the aquaculture enterprise, or compromise its monitoring or data collection.

Response: The subject site is not located adjacent to an aquaculture. This standard does not apply.

5.7.2 Clearing, Grading, Fill and Excavation

1. Clearing and grading shall be scheduled to minimize adverse impacts, including but not limited to, damage to water quality and aquatic life.

Response: The proposed project will provide appropriate erosion control BMPs will be in place during site grading and grading is anticipated to generally occur outside of the wet season. This standard is met.

2. Clearing and grading shall not result in substantial changes to surface water drainage patterns off the project site and onto adjacent properties.

Response: Currently, surface water drainage flow directly to the ditch along SE Leadbetter Road or to the wetland, which then drains to SE Leadbetter Road. Drainage from the ditch passes under SE Leadbetter Road into Lacamas Lake through culverts. The proposed development will collect and treat surface runoff on site, and either be released to the wetland or directly to Lacamas Lake under a large water body exemption as allowed by CMC, maintain the general predevelopment drainage pattern. This standard is met.

3. Developments shall include provisions to control erosion during construction and to ensure preservation of native vegetation for bank stability.

Response: The Applicant will submit an Erosion Control plan for approval by the City and install approved erosion control BMPs prior to beginning site grading. Erosion control BMPs will remain in place until site construction is complete. This standard is met.

4. Grading and grubbed areas shall be planted with a cover crop of native grasses until construction activities are completed.

Response: All grading areas will be seeded with native grass seed mix. This standard is met.

5. Clearing, filling, or excavation shall not be conducted where shoreline stabilization will be necessary to protect materials placed or removed. Disturbed areas shall be stabilized immediately and revegetated with native vegetation.

Response: No grading will occur in a location where shoreline stabilization will be necessary. This standard is met.

6. Fills shall be permitted only in conjunction with a permitted use, and shall be of the minimum size necessary to support that use. Speculative fills are prohibited.

Response: Some fill will occur within the shoreline jurisdiction for trail construction, lot grading, and construction of the N Elk Drive and SE Leadbetter Road intersection. No speculative fills are proposed. This standard is met.

7. Soil, gravel or other substrate transported to the site for fill shall be screened and documented that it is uncontaminated. Use of polluted dredge material or materials normally disposed of at a solid waste facility is prohibited.

Response: Fill areas will use on-site materials for fill. A temporary use permit will be obtained for a mobile rock crusher to crush on-site bed rock for use as gravel fill. If off-site materials are used, they will be screened as required by this section. This standard will be met.

8. Fills shall be designed and placed to allow surface water penetration into groundwater supplies where such conditions existed prior to filling.

Response: Currently, surface water does not generally penetrate into groundwater supplies due to shallow bedrock throughout the site. The on-site wetland and creeks will be protected, and natural water flows will be maintained within the critical areas. This standard is met.

9. Fills must protect shoreline ecological functions, including channel migration processes.

Response: No fill will impact the ecological functions of the shoreline or channel migration. This standard is met.

10. Fill waterward of OHWM shall only be allowed as a conditional use (except for beach nourishment or enhancement projects) and then only when necessary for the following activities: to support a water-dependent or public access use; cleanup and disposal of contaminated sediments as part of an interagency environmental clean-up plan; expansion or alteration of transportation facilities of statewide significance under specific circumstances; mitigation action; and environmental restoration.

Response: No fill will occur waterward of the ordinary high-water mark (OHWM). This standard does not apply.

11. Fills for beach nourishment or enhancement projects are subject to a substantial development permit. In the Columbia River, fills shall be prohibited between the OHWM and minus fifteen (-15) feet CRD, unless shallow water habitat will be created as mitigation.

Response: No fills for beach nourishment or enhancement are proposed with this project. This standard does not apply.

12. Excavation below the OHWM is considered dredging and subject to provisions under that section in Chapter 6.

Response: No excavation will occur below the OHWM. This standard does not apply.

13. Upon completion of construction, remaining cleared areas shall be replanted with native species as approved by the city. Replanted areas shall be maintained such that within three (3) years' time the vegetation is fully re-established.

Response: All cleared areas will be replanted with native species and maintained to ensure vegetation is established within three years. This standard is met.

14. For the purposes of this Program, preparatory work associated with the conversion of land to non-forestry uses and/or developments shall not be considered a forest practice and shall be reviewed in accordance with the provisions for the proposed non-forestry use, the general provisions of this Program, and shall be limited to the minimum necessary to accommodate an approved use.

Response: The site was previously converted from forestry land to residential land under a forest practices permit. All preparatory work will not be associated with forest practices. This standard is met.

5.7.3 Building Design

1. Structures shall be designed to conform to natural contours and minimize disturbance to soils and native vegetation

Response: The proposed development will provide homes that respond to the general grade of the site by using daylight basement houses, garage-under (up-slope) houses, and single-story houses. The development will also provide three large natural area tracts to protect native soils and vegetation. This standard is met.

2. Non-single family structures shall incorporate architectural features that provide compatibility with adjacent properties, enhance views of the landscape from the water, and reduce scale to the extent possible.

Response: All structures within the development will be single-family structures. This standard does not apply.

3. Building surfaces on or adjacent to the water shall employ materials that minimize reflected light.

Response: No buildings are proposed to be on or adjacent to the water. There will also be large native trees screening the proposed buildings from the water. This standard is met.

4. Façade treatments, mechanical equipment and windows in structures taller than two (2) stories, shall be designed and arranged to prevent bird collisions using the best available technology. Single-family residential structures shall be exempt from this provision.

Response: All structures within the development will be single-family structures. This standard does not apply.

5.8 Vegetation Conservation

1. Removal of native vegetation shall be avoided. Where removal of native vegetation cannot be avoided, it shall be minimized to protect ecological functions.
2. If native vegetation removal cannot be avoided it shall be minimized and mitigated as recommended by a qualified biologist within a Critical Area Report and shall result in no net loss of shoreline functions. Lost functions may be replaced by enhancing other functions provided that no net loss in overall functions is demonstrated and habitat connectivity is maintained. Mitigation shall be provided consistent with an approved mitigation plan per Appendix C.

Response: The proposed application will provide three large natural area tracts to protect as much native vegetation as practicable. Some native vegetation will need to be removed to construct the site access at N Elk Drive and SE Leadbetter Road and site grading. The majority of the existing native vegetation within the shoreline jurisdiction will be retained. This standard is met.

3. Clearing by hand-held equipment of invasive or non-native shoreline vegetation or plants listed on the State Noxious Weed List is permitted in shoreline locations if native vegetation is promptly re-established in the disturbed area.

Response: The proposed application does not propose the removal of vegetation in the shoreline. All vegetation removal will occur on the north site of SE Leadbetter Road. Native trees will be planted in the two large natural area tracts to replace the trees removed due to site grading within the natural areas. This standard is met.

4. If non-native vegetation is to be removed, then it shall be replaced with native vegetation within the shoreline jurisdiction.

Response: The proposed application does not propose the removal of vegetation in the shoreline. All vegetation removal will occur on the north site of SE Leadbetter Road. Native trees will be planted in the two large natural area tracts to replace the trees removed due to site grading within the natural areas. This standard is met.

5. Pruning of trees is allowed in compliance with the National Arborist Association pruning standards. Pruning must meet the following criteria:
6. Topping trees is prohibited.

Response: No trees are proposed to be pruned within the shoreline jurisdiction. No trees will be topped. This standard is met.

7. If the city determines that a tree is hazardous as verified by an arborist report, then only the hazardous portion shall be removed. Complete removal should be avoided to the extent possible. The remainder of the tree shall remain to provide habitat functions and slope stability. Mitigation may be required to compensate for reduced tree surface area coverage.

Response: AKS Engineering and Forestry has completed a Tree Report and Tree Plan as part of this application. The arborist identified some hazard trees within the shoreline jurisdiction that will need to be removed due to life-safety concerns. Mitigation measures for these hazard trees are included in the Tree Report. See the Tree Report and Tree Plan included with this application for more information. This standard is met.

8. Natural features such as snags, stumps, logs or uprooted trees, which do not intrude on the navigational channel or threaten or public safety, and existing structures and facilities, shall be left undisturbed.

Response: Any natural features within the shoreline jurisdiction that do not threaten public safety will be left in place. This standard is met.

9. Natural in-stream features such as snags, uprooted trees, or stumps should be left in place unless it can be demonstrated that they are not enhancing shoreline function or are a threat to public safety.

Response: The application does not propose to remove any features within the on-site streams or Lacamas Lake. This standard is met.

10. Aquatic weed control shall only occur to protect native 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: No aquatic weed control is proposed with application. This standard does not apply.

5.9 Visual Access

Visual access shall be maintained, enhanced, and preserved as appropriate on shoreline street-ends, public utility rights-of-way above and below the ordinary high water mark. Any new or expanded building or structure over thirty-five (35) feet in height above average grade level that obstructs the shoreline view of a substantial number of residences that are adjoining shorelines shall not be allowed in accordance with RCW 90.58.320.

Response: The proposed project will construct a portion of the T-3 trail along the southern portion of the site that will provide visual access

5.10 Water Quality and Quantity

1. The location, design, construction, and management of all shoreline uses and activities shall protect the quality and quantity of surface and ground water adjacent to the site.
2. All shoreline development shall comply with the applicable requirements of CMC Chapter 14.02 Stormwater Control. 3. Best management practices (BMPs) for control of erosion and sedimentation shall be implemented for all shoreline development in substantial compliance with CMC Chapter 14.06 Erosion and Sediment Control.

Response: Stormwater runoff generated by the proposed development will be collected on site. All pollution generating runoff will be treated by mechanical filters within the catch basins located in the streets. The majority of the treated stormwater will be conveyed and discharged directly to Lacamas Lake at existing discharge points using the large water body exemption for stormwater discharge. A small portion of the treated stormwater will be conveyed to a stormwater pond in Tract R for detention, prior to being released to Wetland A at rates permitted by Camas Municipal Code (CMC). The stormwater system is designed per the Stormwater Management Manual for Western Washington. See the Preliminary Stormwater Technical Information Report (TIR) and Preliminary Plan included with this application for more information. Preliminary erosion control plans are included with this application. A more detailed and site-specific erosion control plan will be provided with final construction plans for sediment and pollution control. This standard is met.

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4. Potentially harmful materials, including but not limited to oil, chemicals, tires, or hazardous materials, shall not be allowed to enter any body of water or wetland, or to be discharged onto the land except in accordance with CMC Chapter 14.04 Illicit Discharges, dumping and Illicit Connections. Potentially harmful materials shall be maintained in a safe and leak-proof condition

Response: No potentially harmful materials will enter any water body as a result of this project. This standard is met.

- 5 Herbicides, fungicides, fertilizers, and pesticides shall not be applied within twenty-five (25) feet of a waterbody, except by a qualified professional in accordance with state and federal laws. Further, pesticides subject to the final ruling in *Washington Toxics Coalition, et al., v. EPA* shall not be applied within sixty (60) feet for ground applications or within three hundred (300) feet for aerial applications of the subject water bodies and shall be applied by a qualified professional in accordance with state and federal law.

Response: This application does not propose the application of herbicides, pesticides, fungicides, or fertilizers within 25 feet of a water. This standard met.

6. Any structure or feature in the Aquatic shoreline designation shall be constructed and/or maintained with materials that will not adversely affect water quality or aquatic plants or animals. Materials used for decking or other structural components shall be approved by applicable state agencies for contact with water to avoid discharge of pollutants.

Response: No structure or feature are proposed in the Aquatic shoreline. This standard does not apply.

- 7 Conveyance of any substance not composed entirely of surface and stormwater directly to water resources shall be in accordance with CMC Chapter 14.02.

Response: The proposed application only proposed to discharge stormwater directly to Lacamas Lake as allowed by CMC. This standard is met.

8. Septic systems should be located as far landward of the shoreline and floodway as possible. Where permitted, new on-site septic systems shall be located, designed, operated, and maintained to meet all applicable water quality, utility, and health standards.

Response: No septic systems are proposed with this application. This standard does not apply.

CHAPTER 6 SPECIFIC SHORELINE USE REGULATIONS

Table 6-1 Shoreline Use, Modification and Development Standards

Abbreviations: X = Prohibited P = Permitted N/A = Not Applicable C = Conditional Use	AQ	NT	US	MI	HI
Shoreline Designation	Aquatic	Natural	Urban Conservancy	Medium Intensity	High Intensity
Shoreline Uses					
Residential Uses					
Primary structure/house	X	X	P	P	C
• Building Setback	N/A	N/A	100' 2	35' 2	35' 2
• Building Height	N/A	N/A	35'	35'	45'
• Density	In accordance with the underlying zoning				
Accessory Structures					
• Building Setback	N/A	N/A	100' 2	35' 2	35' 2
• Building Height	N/A	N/A	15'	25'	25'
• Density	In accordance with the underlying zoning				
Signs					
Interpretive/Educational or similar	P	P	P	P	P
Commercial/industrial-related	C	X	X	C	P
Transportation Uses					
Secondary/Public Access Roads	X	X	C	P	P
• Right-of-Way Setback	N/A	N/A	100'	50'	50'
Utility Uses					
Underground Utilities (perpendicular to shoreline)	C	X	C	C	C
• Right-of-Way Setback	0'	N/A	100'	50'	50'

6.3 Use-specific Development Regulations

Response: The proposed application is for a 152-lot residential subdivision within the Urban Conservancy shoreline jurisdiction. Per Table 6-1, the proposed use is permitted.

6.3.12 Residential Development

1. Residential developments shall include provisions to ensure preservation of native vegetation and control erosion during construction.

Response: The application proposes three natural area tracts to protect on-site critical areas and native mature vegetation. During construction appropriate erosion control BMPs will be in place to protect the existing vegetation and prevent soil erosion. This standard is met.

2. New residential construction shall be located so as not to require shoreline stabilization measures.

Response: The proposed development will occur on the north side of SE Lacamas Road, across the street from the Lacamas Lake shoreline. The proposed development will not require shoreline stabilization measures. This standard is met.

3. New residential development shall be prohibited in, over, or floating on the water.

Response: The proposed development will not occur in, over, or floating on the water. This standard is met.

4. New residential development shall be located and designed that the bulk and density of structures minimizes view obstructions to and from the shoreline.
5. Clustering of residential units shall be allowed where appropriate to minimize physical and visual impacts on shorelines.

Response: The proposed development will be located north of Lacamas Lake. Residential blocks will be terraced up the hill and houses will meet the 35-foot maximum height. A portion of the T-3 trail will also be constructed in the south portion of the development. Views of the shoreline will be maintained for the T-3 trail, as well as the proposed houses, and minimize view impacts to properties to the north of the development. This standard is met.

6. In those areas where only onsite sewage systems are available, density shall be limited to that which can demonstrably accommodate protection of surface and groundwater quality.

Response: No on-site sewage systems are proposed with this development. This standard does not apply.

7. New residential development, including sewage disposal systems, shall be prohibited in floodways and channel migration zones.

Response: The proposed project with outside of any floodway or channel migration zone. This standard is met.

8. Appurtenances, accessory uses, and facilities serving a residential structure shall be located outside setbacks and critical areas and buffers unless otherwise allowed under this Program to promote community access and recreational opportunities.

Response: All accessory structures, uses, and facilities will be located outside of setbacks and critical areas. This standard is met.

9. New residential units or lots created through land division in the shoreline shall be sized and configured in accordance with the city's zoning ordinance and shall only be permitted when the following standards are met:
 - a. Flood hazard reduction measures are not required and will not be necessary during the life of the development or use in accordance with Appendix C, Chapter 16.55 Frequently Flooded Areas.
 - b. Shoreline stabilization measures are not required.

Response: All proposed lots are outside flood hazard areas and will not require shoreline stabilization. This standard is met.

6.3.13 Signs

1. Free-standing signs shall be for informational purposes such as directional, navigational, educational/interpretive, and safety purposes, unless otherwise allowed under this Program and as specified in Table 6-1.

2. Signs for commercial purposes shall be limited to fascia or wall signs and as regulated by CMC Chapter 18.15 Signs, unless otherwise provided for in this chapter for specific uses.
3. All signs shall be located and designed to minimize interference with vistas, viewpoints, and visual access corridors to the shoreline.
4. Overwater signs or signs on floats or pilings shall be prohibited, except when related to navigation or a water-dependent use.
5. Illuminated signs shall be limited to informational, directional, navigational or safety purposes and shielded so as to eliminate glare when viewed from surrounding properties or watercourses.

Response: No signs are proposed as part of this application. Any signs proposed in the future will meet this requirement of this section and be approved by the City. This standard will be met.

6.3.14 Transportation Uses

Response: The subject site has frontage along SE Leadbetter Road, which runs through the shoreline jurisdiction. The site will gain access from SE Leadbetter Road; however, no frontage improvements are proposed for the road. The access intersection at proposed N Elk Drive will be constructed within the shoreline jurisdiction. The construction of N Elk Drive will not require shoreline stabilization. The proposed development will not adversely impact any water-dependent uses or access to the shoreline. The development provides two natural area tracts along SE Leadbetter Road that helps to buffer the development from the shoreline. No transportation construction work is proposed in, over, or immediately adjacent to the water. This standard is met.

6.3.15 Utilities Uses

Response: The proposed development will provide underground utilities that will generally be within the road rights-of-way. Proposed utilities will connect to the existing utilities in SE Leadbetter Road and at the terminus of N Adams Street. All utilities will be constructed outside of the shoreline jurisdiction with exception of the connections at the existing sanitary sewer pump station and the intersection of SE Leadbetter Road and N Elk Drive. Stormwater facilities to be constructed with the development will not be installed in the shoreline jurisdiction. Two culverts that run under SE Leadbetter Road will need to be upsized with the development to meet current stormwater regulations. The culvert upsizing will be constructed to avoid impacts to native aquatic vegetation. This standard is met.

V. Conclusion

The required findings have been made and this written narrative and accompanying documentation demonstrate that the application is consistent with the applicable provisions of the Camas Municipal Code and Shoreline Master Program. The evidence in the record is substantial and supports approval of the application. Therefore, the Applicant respectfully requests that the City approve this Shoreline Substantial Development Permit application.