

February 14, 2023

Caleigh Belkoff Environmental Manager Georgia-Pacific Consumer Operations IIC 401 NE Adams Street Camas, WA 98607

Subject: Frequently Flooded Areas Report and Flood Hazard Assessment for Demolition of Encroachments Camas, Washington

This report addresses requirements in Camas Ordinance Chapter 16.57 "Frequently Flooded Areas," including a frequently flooded areas report and flood hazard assessment, pertinent to the proposed demolition of approximately 3,000 pilings plus dolphins and other structures along Camas Slough and the north bank of the Columbia River at the Camas Mill.

The demolition would occur in the special flood hazard area (SFHA) of the Columbia River, including portions in the floodway, as mapped by the Federal Emergency Management Agency (FEMA) in the Flood Insurance Study (FIS) of Clark County, Washington and incorporated areas (two volumes, dated effective January 19, 2018 [FEMA 2018]) and its attached Flood Insurance Rate Maps (FIRMs).

The proposed activity consists entirely of removing existing encroachments to flow, and no new construction of any structures is involved. Almost no ground elevations will change in the channel and floodplain (SFHA). However, small areas of net fill (and others of net cut) would occur within the floodway and result from the demolition.

The project also includes demolition of one dolphin located in unincorporated Clark County approximately 65 feet downstream of the city-county line, which is addressed in a separate no-rise certification submitted to the county.

FLOOD HAZARD DESCRIPTION

The area of proposed activity lies in the SFHA and floodway on the north bank of the Columbia River (including Camas Slough, which is treated as part of the Columbia River in the FIS). This reach has been studied in detail by the FEMA as part of the FIS dated June 19, 2018 (FEMA, 2018) and the accompanying FIRMs.

The proposed demolitions would be in an area that lies in FIRM Panels 529 (downstream of Lady Island), 533 (most of Lady Island and Camas Slough), and 534 (the eastern portion of Lady Island and upstream) published by FEMA dated effective September 5, 2012 (panels 529 and 533), and January 19, 2018 (panel 534).

The area includes the north bank of the Columbia River and both banks of Camas Slough upstream of FEMA crosssection "AB" (base flood elevation [BFE] 34.2 feet relative to the North American Vertical Datum of 1988 [NAVD88]) and downstream of section "AD" (34.9 feet NAVD88), and includes cross-section "AC" (34.6 feet NAVD88, for the Columbia River, but not Camas Slough).

The reach lies entirely within the City of Camas (FEMA community \mathbb{D} 530026) except for one dolphin being removed about 2,200 feet downstream of section "AB" and 65 feet downstream of the city-county boundary. This single dolphin lies just inside the jurisdiction of unincorporated Clark County (community \mathbb{D} 530024), and a separate certification of no-rise is being made to the County.

The cross-section labels and BFEs are from the latest FEMA national flood hazard map layer (accessed July 2020) and the FEMA FIS report (FEMA 2018).

Attachment 1 presents the following information reproduced from the FIS:

FIRM panels 529,533, and 534. Proposed activity begins at the city boundary near river mile 117.5 (measured at the profile baseline near the river centerline) and extends upstream to about mile 120.4

vsp

- Flood Profile 22P of the Columbia River from river mile 117.0 to river mile 122.2, which includes the reach of proposed activity.
- Floodway Data Table (FIS Table 9) highlighting lettered cross-sections AB through AD that includes the reach of proposed activity.

Attachment 2 presents this same information from the FIS overlaid on site plans for the proposed demolition. Areas of net cut and net fill are also shown (Attachment 2, Figure 5).

Attachment 3 presents project plan sheets.

PROJECT DESCRIPTION

Georgia-Pacific Consumer Operations IIC (GP) is planning to remove and/or demolish several structures associated with GP's prior operations in the City of Camas, Washington. The structures to be removed are located in-water and/or over water on the Columbia River and Camas Slough and are located within the City of Camas or Clark County Shoreline Management Zones. The structures to be removed and/or demolished are no longer supporting current operations at the Camas Mill.

The project footprint includes areas along the shoreline at the Camas Mill, several other locations in the Camas Slough, and approximately 3 miles of shoreline near the Camas Mill.

The structures to be removed include approximately 3,000 piles and dolphins, one building-like industrial structure, three docks/piers, an oil storage tank and its pumps, and a conveyor housing. Where piles, dolphins, and structures are to be removed, the river bank will not be changed, except in the area of the PECO Dock, where the bank will be graded back more gradually than existing, and at the large concrete foundation of the former Berger Crane, where the concrete will be removed to well below water surface and the riverbank regraded to bury the remaining obstruction. **Attachment** 2 shows in detail the locations of the structures to be removed in relation to the SFHA, floodway boundary, and lettered FIS cross-sections AB and AC

The proposed project will require work below the ordinary high water of the Columbia River and Camas Slough. Some of the structures to be removed are located on State-owned land currently leased by CP through the Washington Department of Natural Resources (WDNR).

GP is the sole organization responsible for maintaining, developing, removing, and deconstructing facilities at the Camas Mill.

CITY OF CAMAS REQUIREMENTS FOR FREQUENTLY FLOODED AREAS

The City of Camas Code 16.57 addresses frequently flooded areas. Portions that relate to the proposed demolition project state the following.

Chapter 16.57-FREQUENTLY FLOODED AREAS

16.57.010- Applicability.

A. Frequently Flooded Areas" The areas of <u>special flood hazard</u> identified by the Federal Insurance Administration in a scientific and engineering report entitled "The Flood Insurance Study for Clark County, Washington, and incorporated areas" dated September 5, 2012, and any revisions thereto, with accompanying Flood Insurance Rate Maps (FIRM). ...



16.57.020-Uses and activities prohibited.

E Development in Floodways.

1. New Development Requires Certification by an Engineer. Encroachments, including new construction, substantial improvements, fill, and other development, are prohibited within designated floodways <u>unless certified</u> by a registered professional engineer. Such certification shall demonstrate through hydrologic and hydraulic analyses, performed in accordance with standard engineering practice that the <u>proposed encroachment will not result in any increase in flood levels</u> during the occurrence of the base flood discharge. ...

16.57.030-Critical area report-Additional requirements.

In addition to the items listed in CMC 16.51.140 Critical Area Reporting, the following is required:

A. Prepared by a Qualified Professional. <u>A frequently</u>, <u>flooded areas report</u> shall be prepared by a qualified professional who is a hydrologist, or engineer, who is licensed in the state of Washington, with experience in preparing flood hazard assessments.

B. Area Addressed in Critical Area Report. The following areas shall be addressed in a critical area report for frequently flooded areas:

1. The site area of the proposed activity;

2 All areas of a special flood hazard area, as indicated on the flood insurance rate map(s), within three hundred feet of the project area; and

3. All other flood areas indicated on the flood insurance rate map(s) within three hundred feet of the project area.

C. <u>Flood Hazard Assessment</u> Required. A critical area report for a proposed activity within a frequently flooded area shall contain a flood hazard assessment, including the following site- and proposal-related information at a minimum:

1. Site and Construction Plans. A copy of the site and construction plans for the development proposal showing:

a. Floodplain (one hundred-year flood elevation), ten- and fifty-year flood elevations, floodway, other critical areas, management zones, and shoreline areas;

b. Proposed development, including the location o fexisting and proposed **structures**, fill, storage o fmaterials, and drainage facilities, with dimensions indicating distances to the floodplain; ...

D. Information Regarding Other Critical Areas. Potential impacts to wetlands, fish and wildlife habitat, and other critical areas shall be addressed in accordance with the applicable sections of these provisions. ...

16.57.050-Performance standards-General requirements.

H Fill and Grading. Fill and grading within the floodplain shall only occur upon a determination from a registered professional engineer that the fill or grading will not block side channels, inhibit channel migration, increase flood hazards to others, or be placed within a channel migration zone, whether or not the City has delineated such zones as of the time of the application. If fill or grading is located in a floodway, CMC Section 16.57.020 applies.



16.57.080-Variations-Additional considerations for frequently flooded areas.

A. Additional Variation Considerations. In review of variation requests for activities within frequently flooded areas, the City shall consider all technical evaluations, relevant factors, standards specified in this chapter, and:

1. The danger to life and property due to flooding, erosion damage, or materials swept onto other lands during flood events;

B. Variations shall only be issued upon a determination that the granting of a variation will not result in increased flood heights, additional threats to public safety, ...

C. Variations shall not be issued within a designated floodway if any increase in flood levels during the base flood discharge would result.

Summarized below are our conclusions regarding how these sections of the Camas Code relate to GP's proposed demolition:

- The demolition affects frequently flooded areas because proposed fill (defined as "Development" in Camas Code) would occur in the SFHA and the floodway of the Columbia River. No other development is proposed because no construction is proposed, and the removal of encroachments in the floodway and SFHA are not defined as development by Camas Code.
- Certification by a registered professional engineer will be required that the proposed fill, together with
 proposed cut and removal of encroaching piles and structures, will not result in any increase in flood levels
 during the occurrence of the base flood (100-year) discharge. This certification will be based on hydraulic
 analysis comparing the existing regulatory model to one that incorporates the proposed activity. This
 certification will be documented separate from this memorandum.
- A frequently flooded areas report prepared by a qualified professional engineer or hydrologist will be required that includes site plans showing location of the proposed activity in relation to the FEMA SFHA (floodplain) and floodway, other critical areas, management zones, and shoreline areas. **This memorandum is intended to satisfy this requirement.**
- This proposed project consists only of demolition with no new development or redevelopment and no construction of new structures. As such, the project does not represent a "Development Proposal" as described by Camas Code 16.57.030 Cl, and no development is proposed for which a flood hazard assessment is required beyond the frequently flood areas report included in this memorandum.
- Information regarding other critical areas shall be addressed in separate documents in accordance with the
 applicable sections of those provisions, including potential impacts to wetlands, fish and wildlife habitat, and
 other critical areas.
- Fill and grading within the SFHA (floodplain), both inside and outside the floodway, will require determination from a registered professional engineer that the fill or grading will not block side channels, inhibit channel migration, increase flood hazards to others, or be placed within a channel migration zone. This determination will be documented separate from this memorandum.
- A variation to the Camas Code (variance) cannot be issued to avoid determination of the no-rise requirement for fill in the floodway. 1

FREQUENTLY FLOODED AREAS REPORT

Attachment 2 presents site and construction plans that show the location of the proposed activity in relation to the FEMA SFHA (floodplain) and floodway. The figures in Attachment 2 show the same FEMA information shown

¹ Camas, Washington. May 19, 2020. Code of Ordinances. Title 16-Environment Critical Areas. Chapter 16.57-Frequently Flooded Areas. Retrieved July 21, 2020, from:

https://library.municode.com/wa/camas/codes/code_of_ordinances?nodeid=TIT16EN_CRAR_CH16.57FRFLAR

wsp

in **Attachment 1** but projected onto the site plans. **Attachment 2** shows the FEMA SFHA information within at least 300 feet of areas of proposed activity.

The site plans in Attachment 2 includes the following sheets, numbered as Figure 1 through Figure 6:

- Figure 1 shows the full extent of the site plans; demolition extends from approximately river mile 117.51 (the boundary of Camas and unincorporated Clark County) to river mile 121.1. Figure 1 also provides a spatial index for the other site plans shown in Figures 2 thorough 6.
- Figure 2 shows approximately river mile 117.51 to 118.2, downstream of Lady Island, including project demolition sites LA-2 (dolphin removal) and LA-3 (area of piles and dolphin removals). Area LA-1 is also shown, but it is a pile demolition outside the city limit that will be addressed under a separate application to Clark County; its removal will be included in the no-rise analysis for the City of Camas. Figure 2 also shows FEMA cross-section "AB" and the boundary of the City of Camas and unincorporated Clark County. The sites shown are only removals of encroaching structures with no change in grade and no construction.
- Figure 3 shows approximately river mile 118.2 to 118.7, mostly showing Camas Slough and the downstream portion of Lady Island, including project demolition sites LA-4, LA-5, and LA-6, where dolphin structures will be removed along with a floating wooden walkway. An area of temporary fill will occur in the lower-right, outside (above) the SFHA. The sites shown are only removals of encroaching structures with no change in grade and no construction.
- Figure 4 shows approximately river mile 118.7 to 119.6 along Camas Slough, including project demolition sites LA-8 through LA-13. Site LA-12 is an area of dolphins and piles; the other sites are single dolphins. The sites shown are only removals of encroaching structures with no change in grade and no construction.
- Figure 5 shows approximately river mile 119.6 to 120.4 (the upstream extent of the project) along Camas Slough, including project demolition sites LA-14 through LA-19 plus three wastewater lines that will not be removed. Sites LA-17 and LA-19 are areas of dolphins and piles; the other sites are single dolphins. The three wastewater lines protrude above the bottom to various degrees and are included in the existing conditions. Areas that will be dredged as part of the removal are shown in green hatching. In addition, small areas of net fill are shown. In the western portion of IA 17, the large concrete foundation of the Berger Crane will be mostly removed, and the remainder buried by fill. The Tug Dock just west of the Berger Crane foundation will also be removed. Grading, including cut and fill, is proposed to smooth a bank underneath where an existing encroaching structure (the PBCO dock) and associated buildings will be removed in part of the central and eastern portion of LA-17. No construction is proposed at these sites.
- **Figure 6** shows approximately river mile 120.3 to 121.0 along Camas Slough including project LA-21, where an existing water intake structure and building will not be removed but are included as part of existing conditions. The figure shows the confluence with the Washougal River, which is upstream of the area of activity. The figure is for context.



If you have any questions, please do not hesitate to contact me.

Sincerely,

WSP USA Environment & Infrastructure Inc.



Seth Jelen, PE, CFM, CWRE Principal Engineer-Water Resources E-mail: sethJelen@wsp.com

Project Review by:

Tyler Marley, PE

Senior Project Engineer - Water Resources E-mail: tyler.marley@wsp.com

Attachments: Attachment 1: Flood Insurance Study Information Attachment 2: Flood Hazard Areas and Project Locations Attachment 3: Demo Plan Sheets

ATTACHMENT 1: FLOOD INSURANCE STUDY INFORMATION

NOTES TO USERS

This map is for use in administring the National Flaod Insurance Program. If does not necessarily identify all areas subject to fibeding, particularly from local drainage storders of amalities. This community map repeations should be consultar for possible updated or additional flood hazard information.

To chain now deputed information in answerkees **Boar Rood Resolution**, BPTER Load Rook (Rook (Ro) (Rook (Ro

Control face the Development of the second s

Boundaries of the **Roodways** were computed at cross sections and interpolated between cross sections. The floodways were stated on hydraulic considerations with regard as requirements of the National Flood Instance Program. Floodway widths and other centrent floodway data are provided in the Flood Insurance Study Report for this jurisdicture.

Centain areas not in Special Flood Hazard Areas may be protected by flood control structures. Rater to Section 2.4 "Flood Protection Measures" of the Flood Insurance Study Report for Information on flood control sinuctures for the jurisdiction.

The production used is the prevention of this may new Universal Transmost Neurostic (UTU) and TL. The Antonial dataway was 1480-035, GRS 1480-000 spheroid. Differences in dataway, spheroid, projection of UTM zones used in the production of FINNE for adjacent juncticities may available. In sight, positional differences in map features across juncticities boundaries. These differences do rid affect the accuracy of the FINN.

Fixed elevations on this map are referenced to the North American Vertical Desart of fiber node of the same vertical desarts of the same set of the same set of the same vertical desarts of the same vertical desarts. For information and gradual desarts the same vertical desarts are same set of the same set of the same vertical desarts are same set of the same set of the same set of the same vertical desarts are same set of the sam

NCS Information Services NCAA, N/NGS12 National Goodetic Survey SSMC-3, 19202 1315 East-Wesk Highway Silver Spring, Maryland 20910-3262 (301) 713-3242

To obtain current elevation, description, and/or location information for bench market shown on this map, please contact the Information Services Branch of the Nationa Geodelic Survey at (301) 713-3242, or visit its wobsite at <u>into Aware role nona new</u>.

Base Map information shown on this FIRM was derived from the U.S.D.A. Farm Service Agency Netional Agriculture imagery Program (NAIP) produced at a scale of 1:12.000 from photography dated 2009.

The profile baselines decided on this map represent the hydroulic modeling baselines that match the flood profiles in the TIS report. As a result of improved teographic data, the profile baseline, in some cases, may deviate significantly 'rom the channel controlline or appear outside the SPT/A.

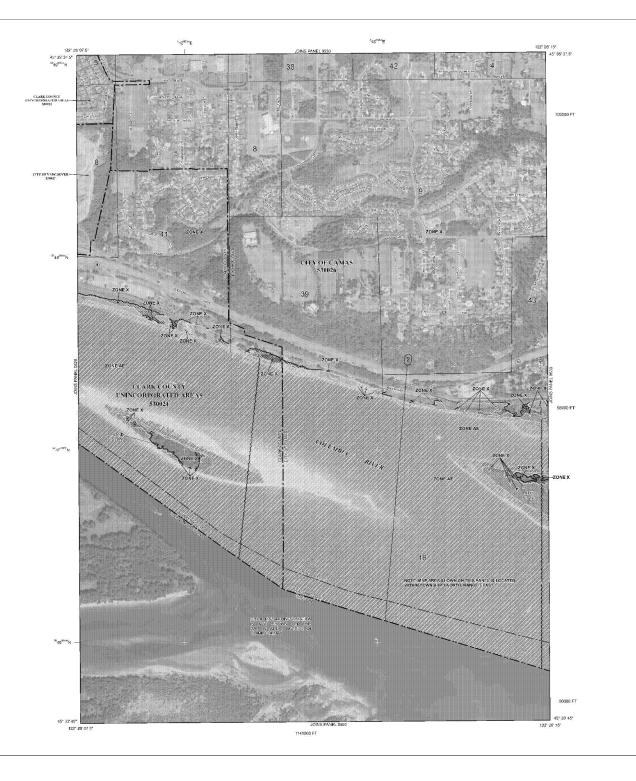
This map reflects more detailed and up-to-date stream channel configurations have those shown on the previous FMM for this junction. The isopatients and localizes that are translated them the previous FRM may then bear equated to contern to these new stream channel configurations. As a result, the FROM Photos and Pocksway, Data base for multiple streams in the FROM Insurance Study Report, pixel, contain card to failed in plaquet tabulance stream channel datasets that fill frame with a stream of the map.

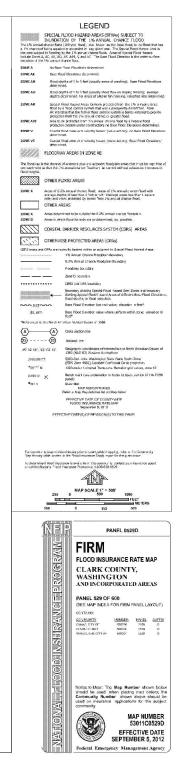
Corporate limits shown on this map are based on the best data available at the time of publication. Because changes due to annexistione or de-enexatinate may have occurred after this map was publicited, map users should contact appropriate community officials to varify count corporate limit locations.

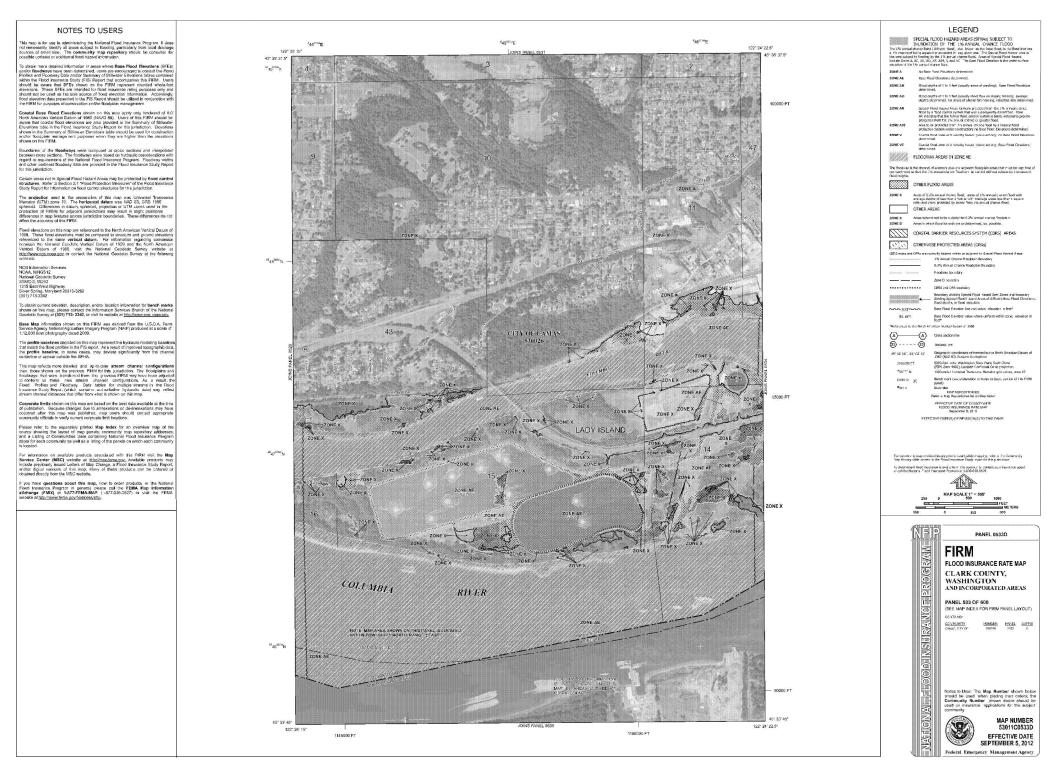
Please refer to the separately plinited Map Index for an overview map of the county showing the layout of map panels; community map repository addresses; and a Listing of Communities sub-containing Martinal Flood insurance Program does for each community as well as a leting of the panels on which each community is located.

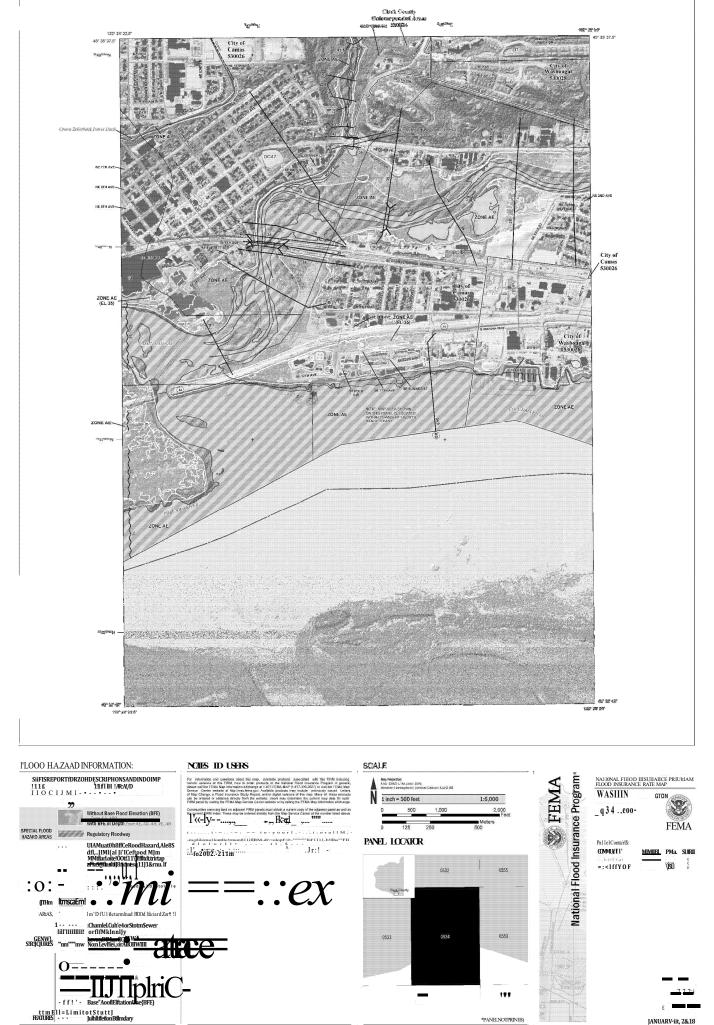
For information on available products associated with this FIRM visit the Map Service Center (MSC) website at <u>http://nec.lena.gov</u>, Available products may include providual issued Lettors of Man Change, at Boto Haustino's Stuly Report, and/or digital versions at their map. Many of these products can be ontered or obtained directly from the MSC website.

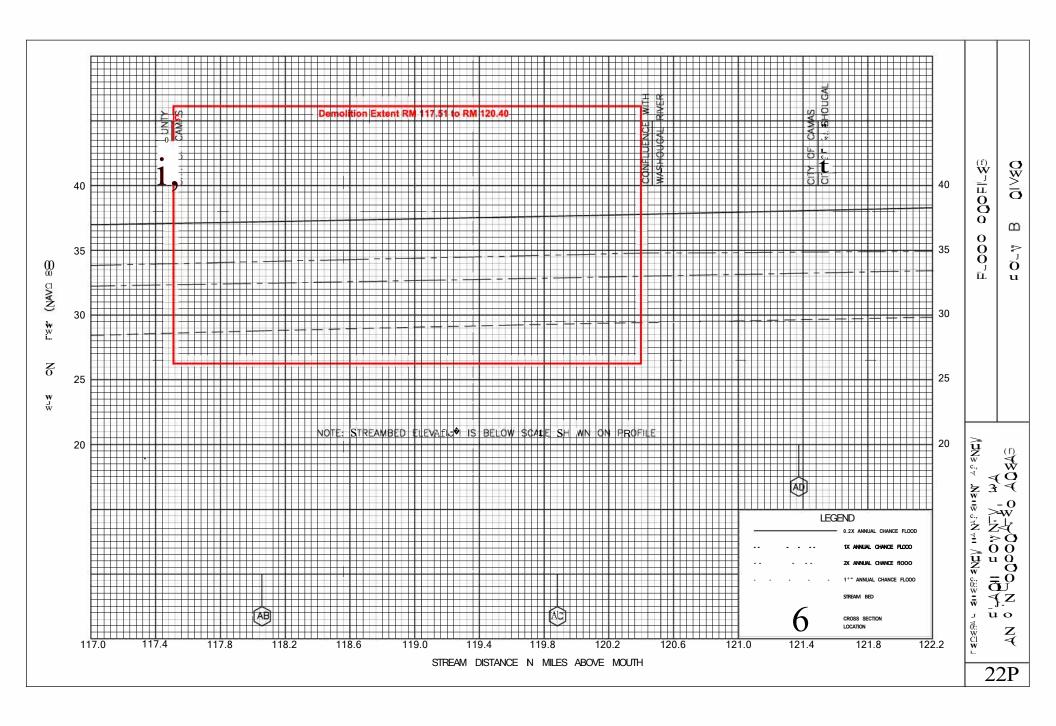
If you have questions about this map, how to order products, or the National Flood Insurance Program in general pixore call the FEMA Map Information eXchange (FMIX) or 1-877-FEMA-MAP (-977-366-2627) or visit the FEMA weaking at <u>http://www.fema.gov/business.nip</u>.











FLOODING SOURCE		FLOODWAY			1-PERCENT ANNUAL CHANCE FLOOD WATER SURFACE ELEVATION			
CROSS SECTION	DISTANCE ¹	WIDTH (FT.)	SECTION AREA (SQ.FT.)	MEAN VELOCITY (F. P.S.)	REGULATORY (NAVD88)	WITHOUT FLOODWAY (NAVD88)	WITH FLOODWAY (NAVD88)	INCREAS
COLUMBIA RIVER				<u>.</u>				
AA	116.10	4,773 <i>I</i> 1,206 ²	178,406	3.2	33.7	33.2	34.1	0.9
AB	118.06	6,731 / 3,745 ²	210,779	2.7	34.2	33.6	34.4	0.8
AC	119.88	2,280 I 1,367 ²	127,035	4.4	34.6	33.9	35.0	0.9
AD	121.37	4,250 / 1, 101 ²	157,277	3.6	34.9	34.3	35.1	0.8
AE	122.86	5,500 / 1,856 ²	189,310	2.9	35.1	34.7	35.5	0.8
AF	123.43	5,700 <i>I</i> 2,039 ²	197,499	2.8	35.3	34.8	35.7	0.9
AG	123.98	5,800 / 2,475 ²	206,916	2.7	35.4	34.8	35.7	0.9
AH	125.53	6,950 <i>I</i> 4, 728 ²	198,505	2.8	35.6	35.1	36.0	0.9
AI	126.58	5,900 <i>I</i> 5,498 ²	173,646	3.2	35.8	35.2	36.1	0.9
eam distance in miles above	mouth			4lwidth/width withi	n county limits			

m Fe

œ

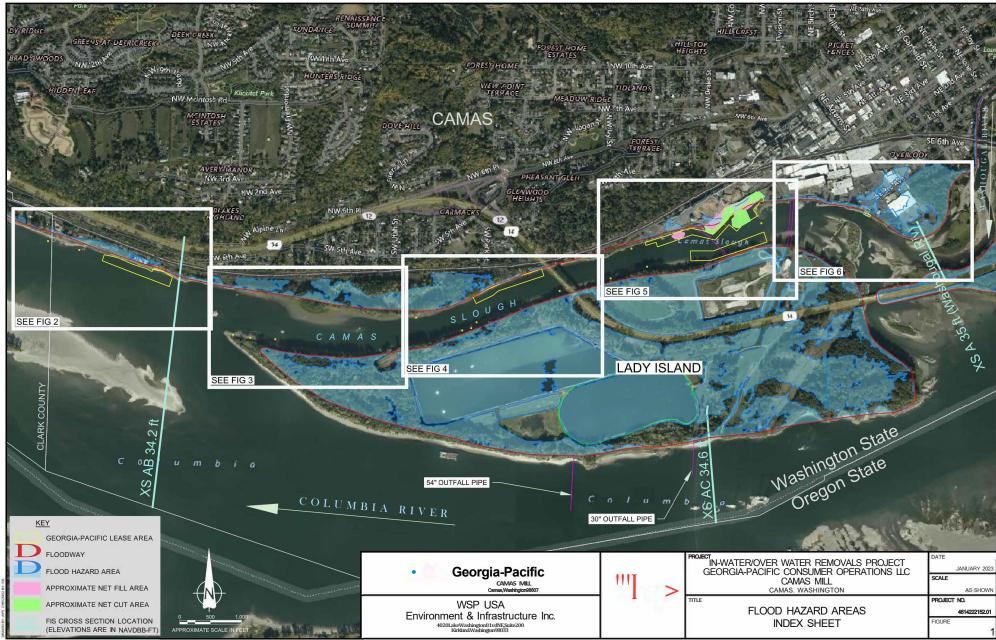
!3IE1evations based on HEC-2 hydraulic model

FEDERAL EMERGENCY MANAGEMENT AGENCY CLARK COUNTY, WASHINGTON AND INCORPORATED AREAS

FLOODWAY DATA

COLUMBIA RIVER

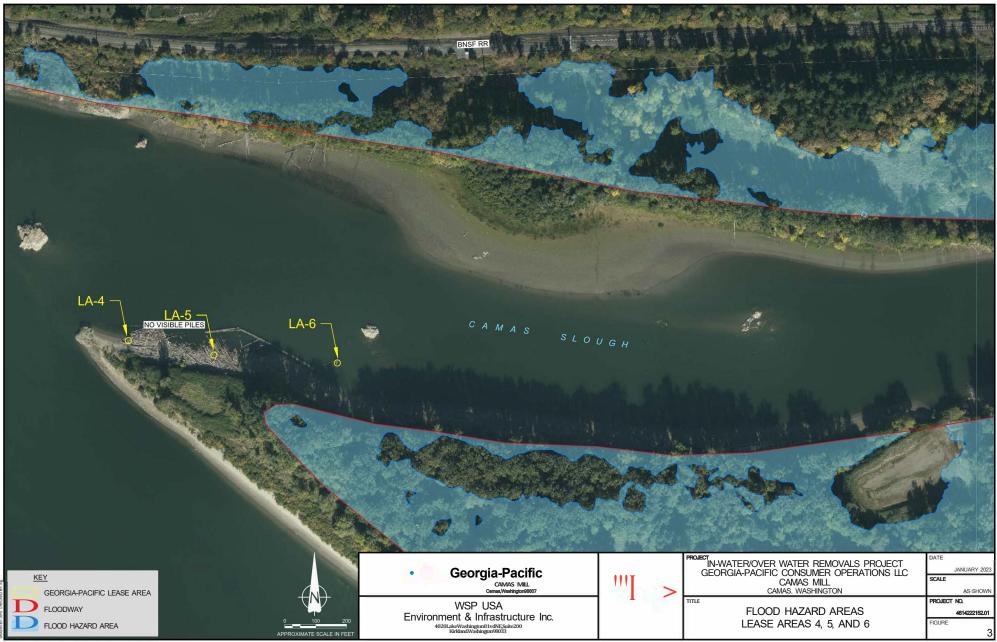
ATTACHMENT 2: FLOOD HAZARD AREAS AND PROJECT LOCATIONS



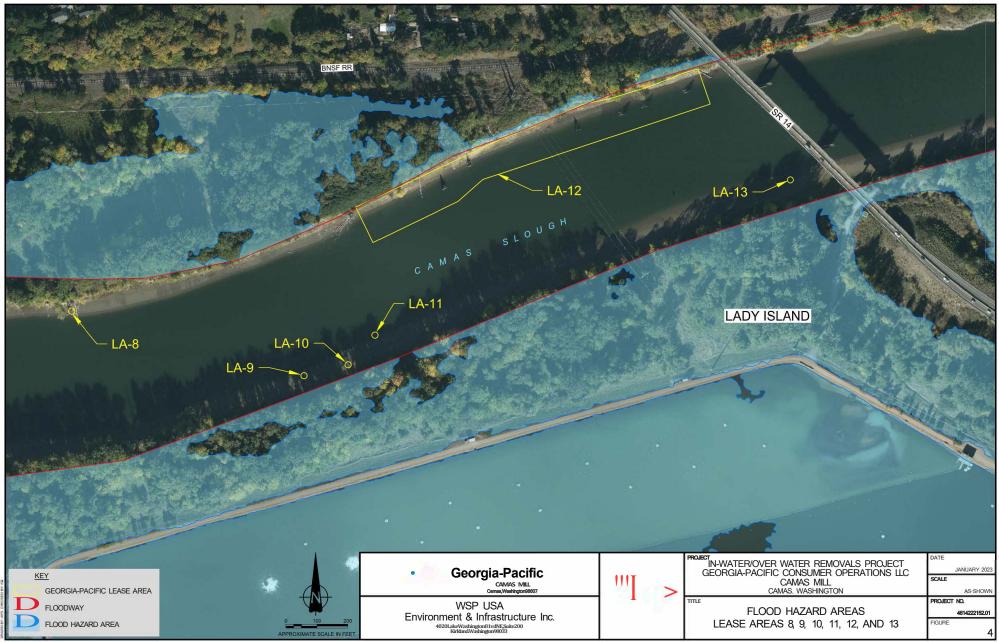
Jaenissien sanbeglünsühre - Wood PLCURed/PS18200620/hon5etri/22220deg/boden/_APS_012523.deg - Sae - Jan. 25. 2023 11.25an - adam starberg



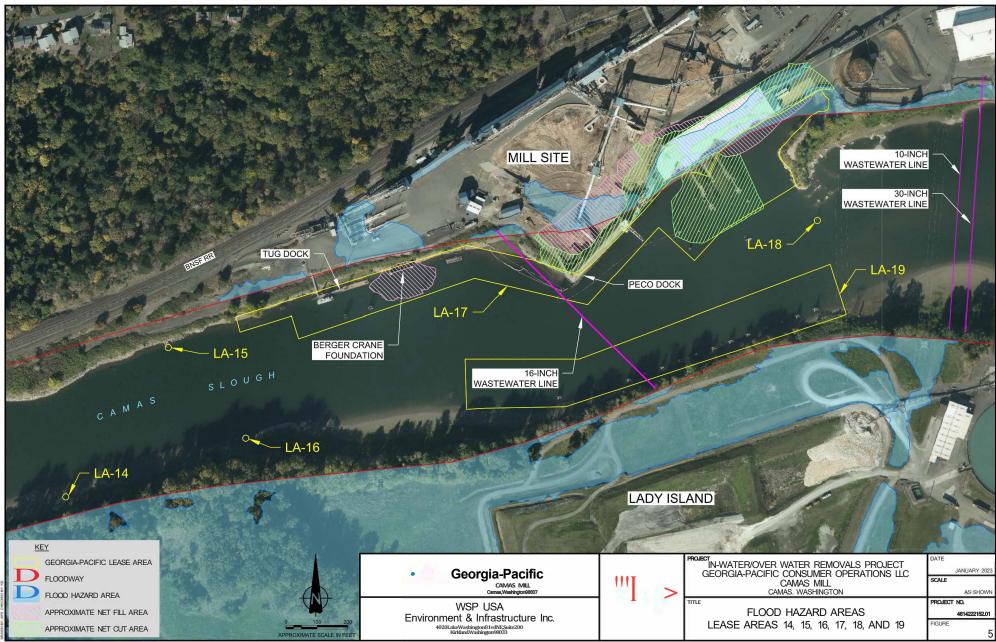
Csübenlisten sindergiOnsDrive - Wood PLCORcet/PS1600620/honSet/070000kg/0xodorg_APS_012503 slog - 1A-123 - Jan 26. 2023 11 25m - eden starberg



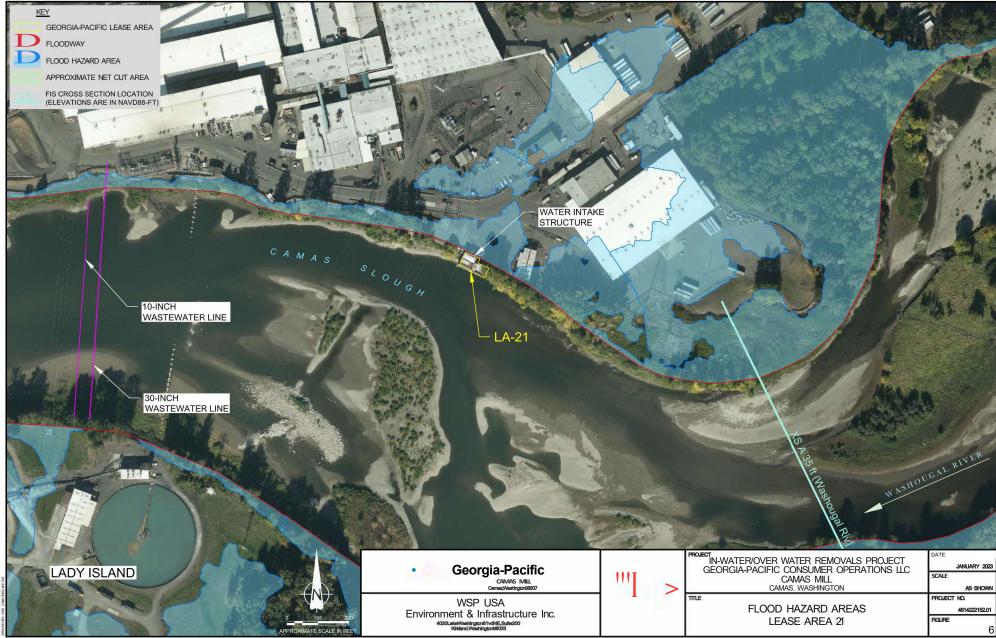
Cillienkistern stanbergiCheilbrive - Wood PLCORoot PS18200620/PromSethi0723302ebg-dooderey, APS_012533 steg - LA-456 - Jan. 20. 2023 11 25am - eden stanberg



litervisitern sambergiChrathive - Wood PE COROUT/P5162006209*ter-Setti 072330.deg Academy_APS_312533.deg - 1.4-8-13 - Jan, 20, 2023 11:25art - estam stamberg

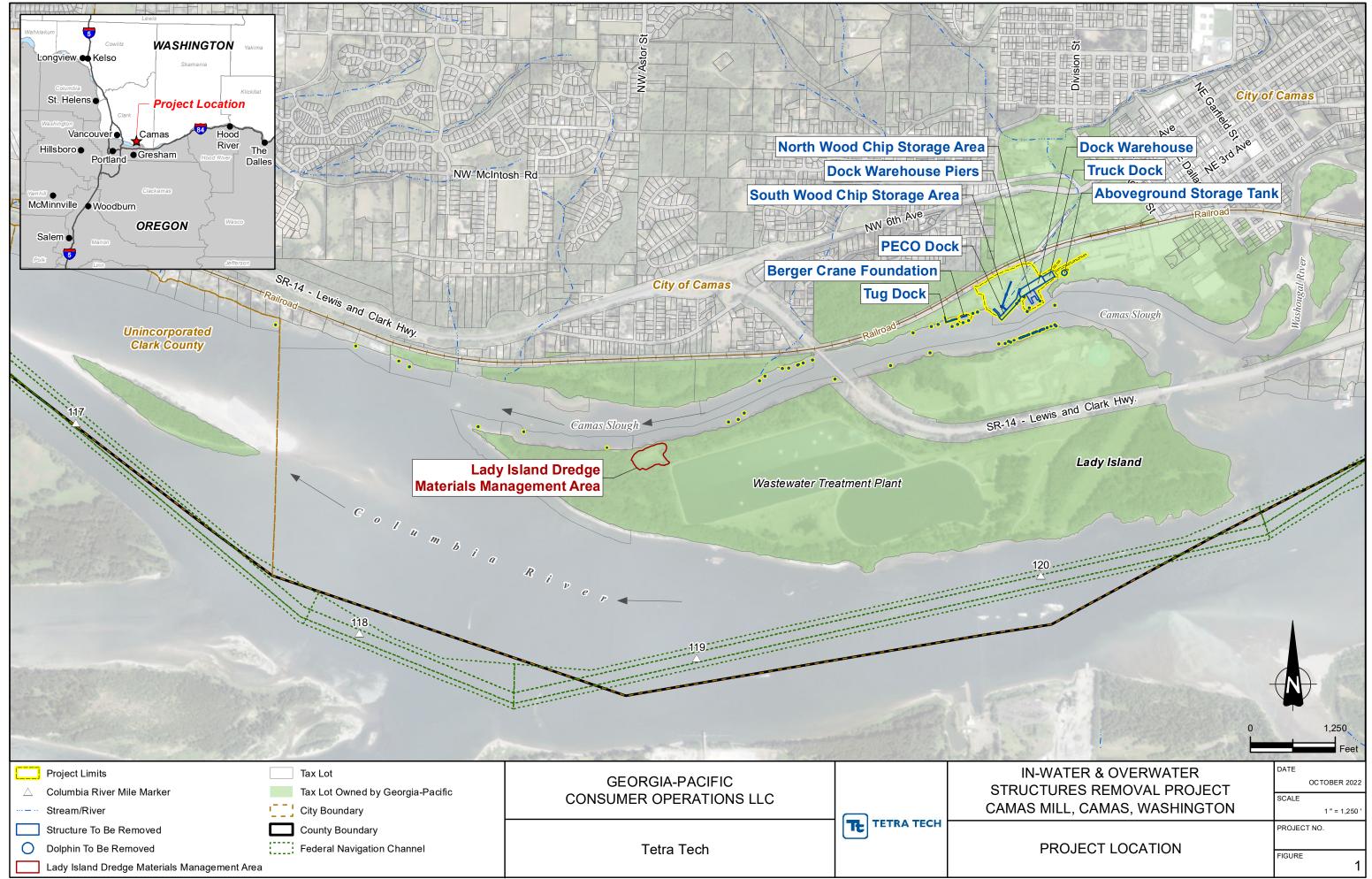


Statewinstern stanberg/OreEntwo - Wood PLCORect/PS18200620/PromSetV0722200deg-Gooderey, APS_012533.deg - LA-14-19 - Jan. 26, 2022 11 State - educt stanberg



Cillienisten andergOniOnio w. Wood PLCIRed PS182006009 ren5etr0122202 deg funders JAPS_212522 deg - 14-21 - Jan 20, 2021 11 20am - Adam alerberg

ATTACHMENT 3: DEMO PLAN SHEETS



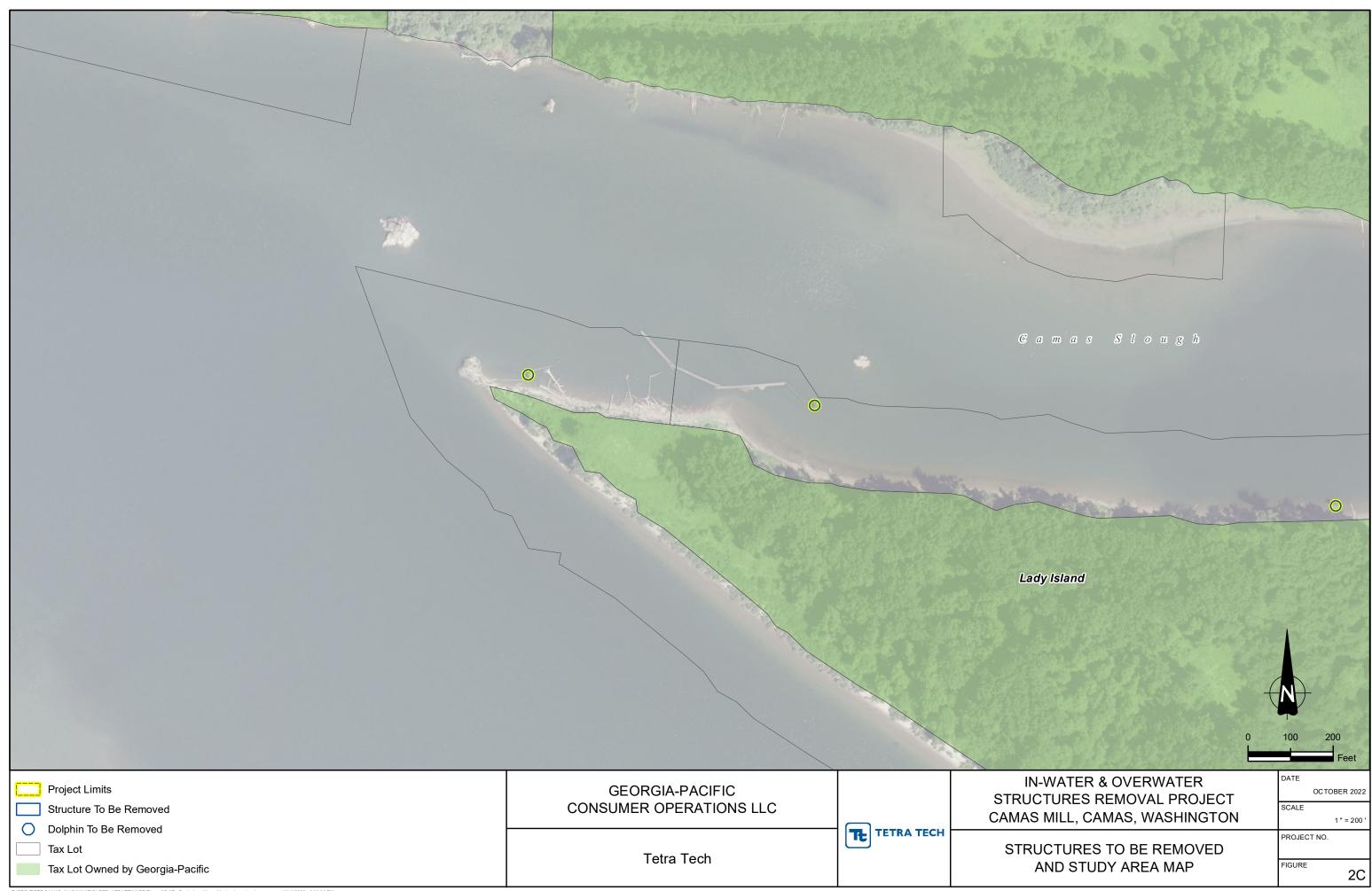
R:\PROJECTS\CAMAS_0117-0064\FIGURES_UPDATE\MAPS\Figure 1 - Project Location.mxd - sierra.marrs - 10/19/2022 - 3:37:33 PM

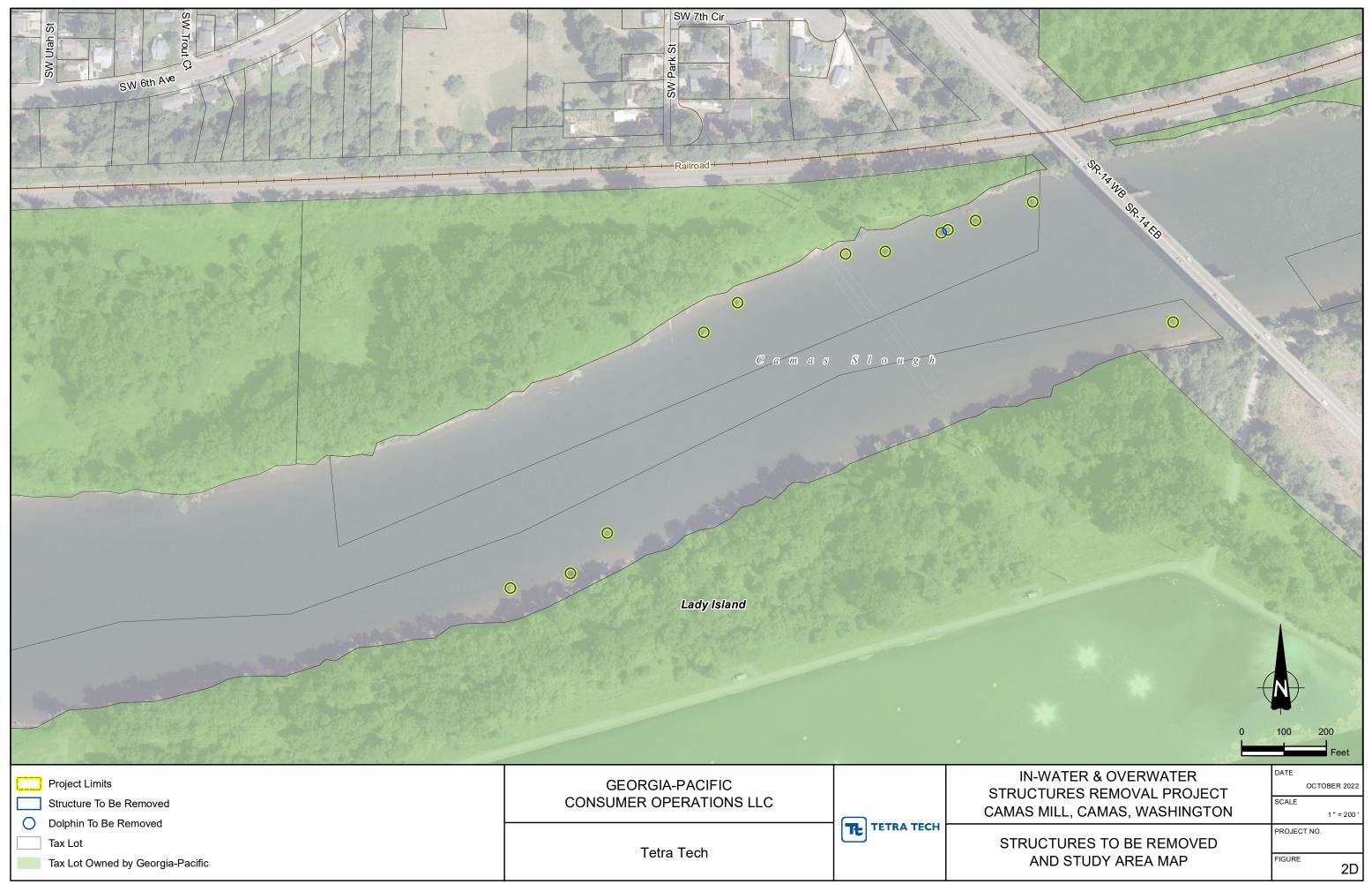
Vincerporated Cart Inter Cart County December 2000 Cart Inter Cart		reatment Plant	ZE SR-14
Project Limits Tax Lot Owned by Georgia-Pacific Structure To Be Removed City Boundary	GEORGIA-PACIFIC CONSUMER OPERATIONS LLC	TETRA TECH	STRU CAMA
 Dolphin To Be Removed County Boundary Stream/River Tax Lot 	Tetra Tech	TE TETRA TECH	STR

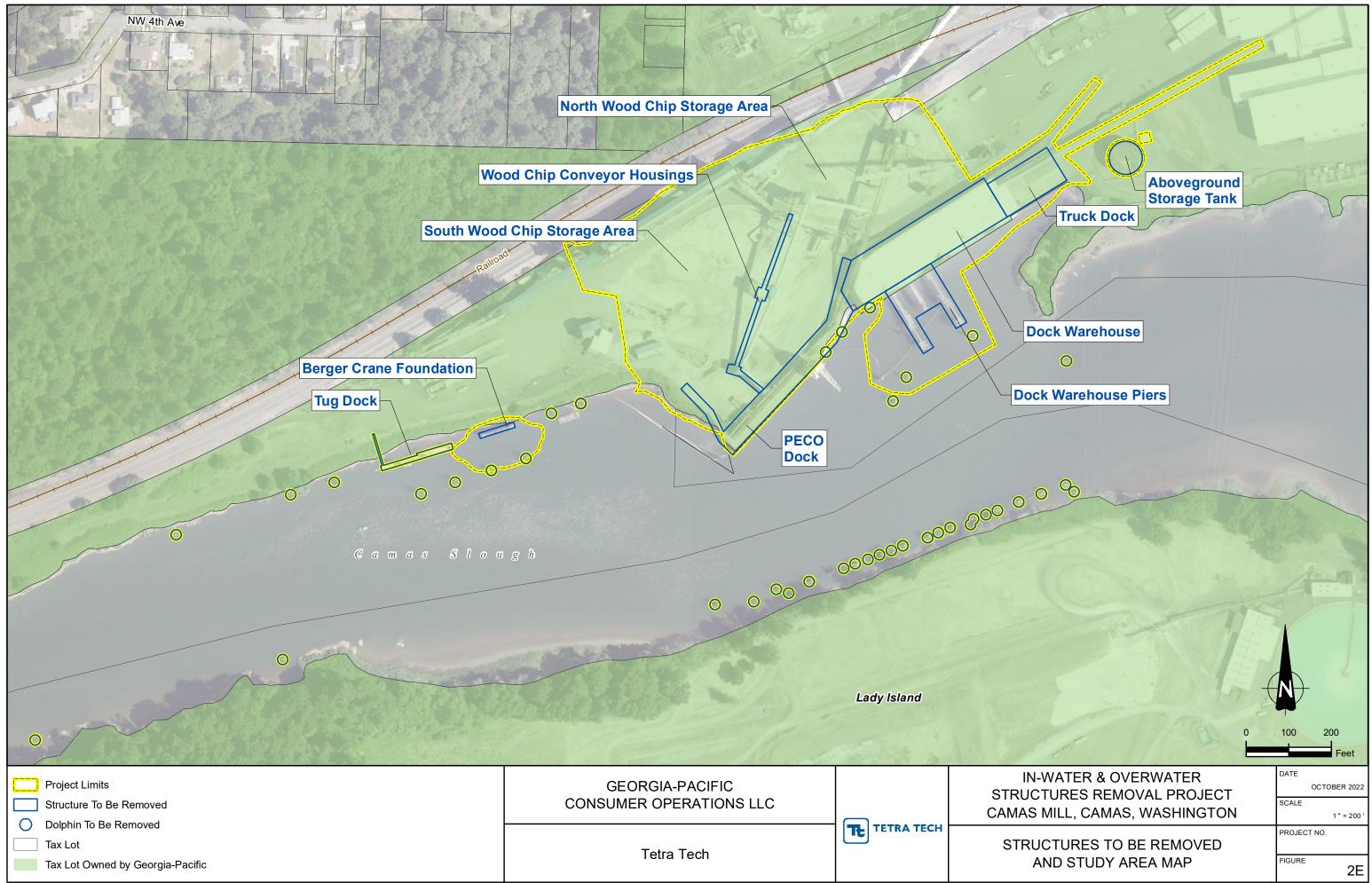


	Columbia River	R-14 WB EB	
Project Limits '' City Boundary Structure To Be Removed	GEORGIA-PACIFIC CONSUMER OPERATIONS LLC		IN STRUC CAMAS
 Dolphin To Be Removed Tax Lot Tax Lot Owned by Georgia-Pacific 	Tetra Tech	TETRA TECH	STR

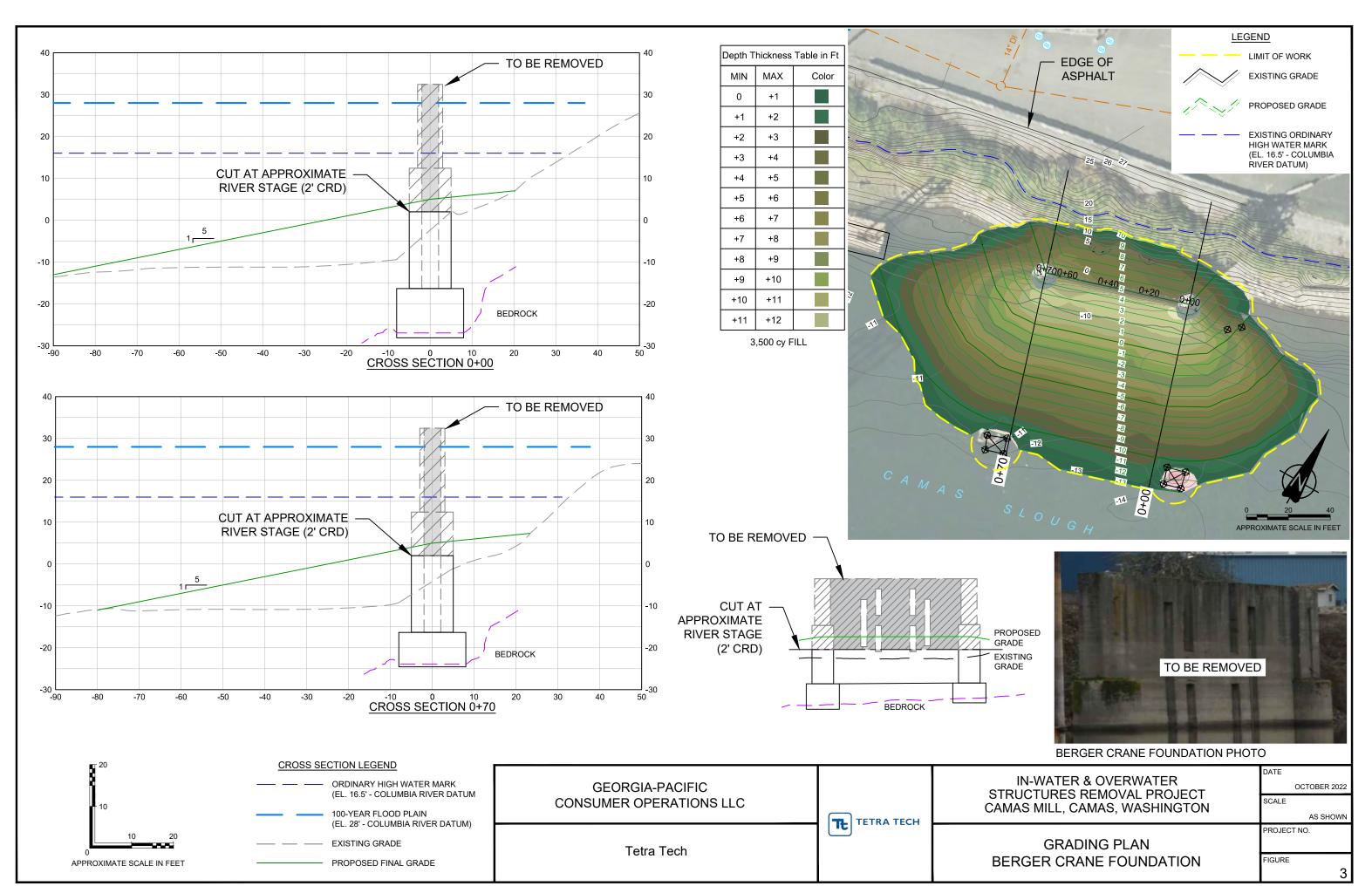


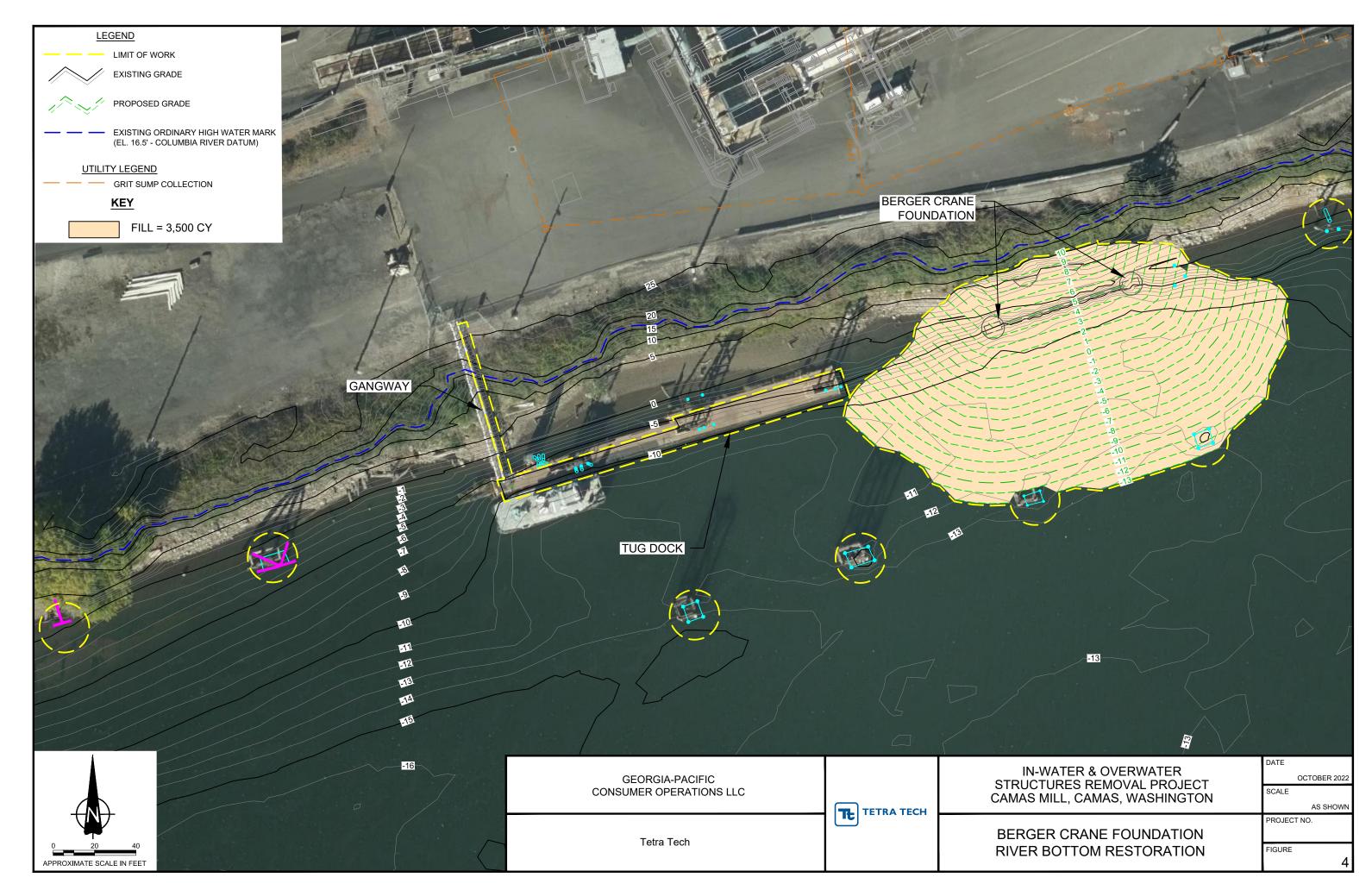


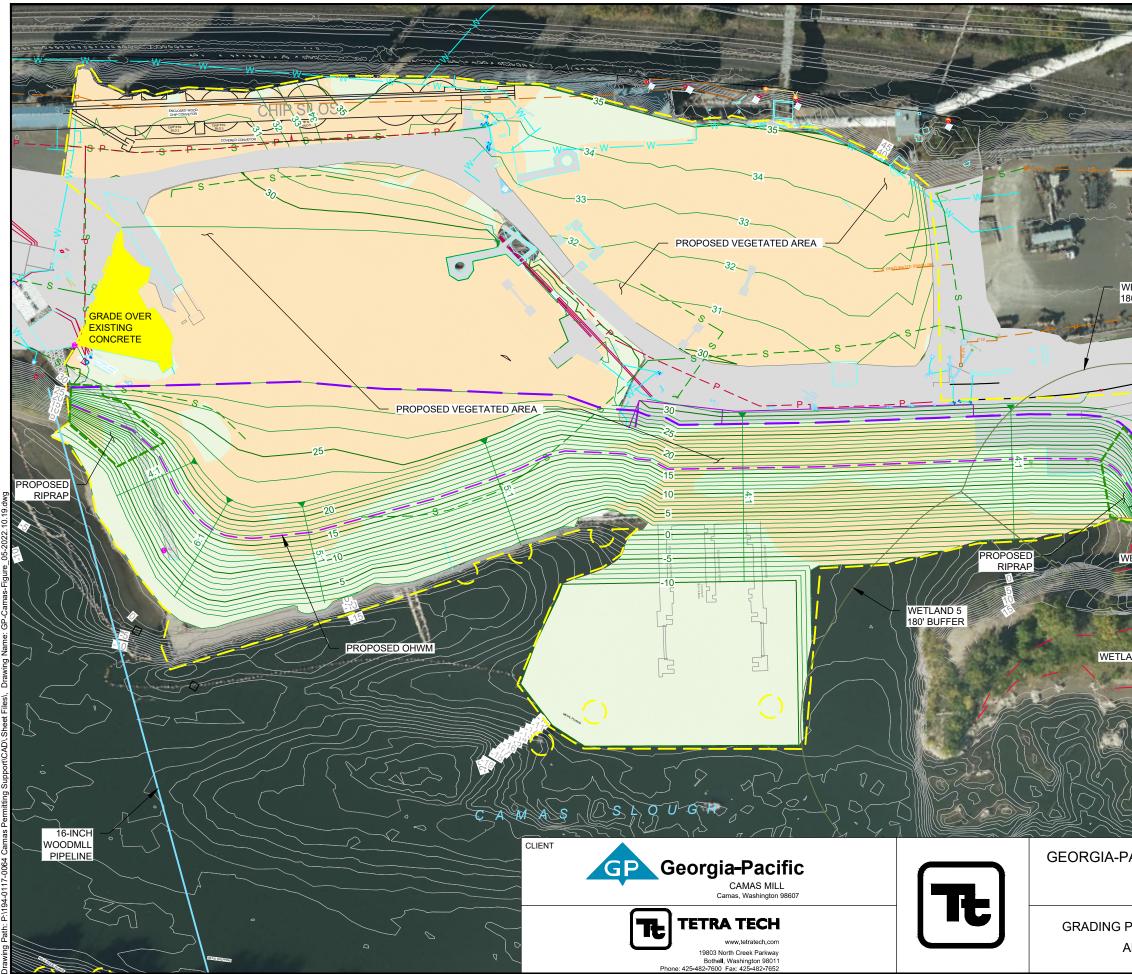




R:\PROJECTS\CAMAS_0117-0064\FIGURES_UPDATE\MAPS\Figure 2B-2E - Study Area Map - Mapbook.mxd - sierra.marrs - 10/19/2022 - 3:36:26 PM







The second second	LEGEND				
Sal The	LIMIT OF WORK				
Gray !	EXISTING GRADE CONTOUR (SITEWIDE LAND SURVEYING				
	PROPOSED FINAL GRADE CONTOURS				
	PROPOSED ORDINARY HIGH WATER MARK (OHWM) (EL. 16.5' - COLUMBIA RIVER DATUM)				
	PROPOSED 100-YEAR FLOOD PLAIN (EL. 28' - COLUMBIA RIVER DATUM)				
o C. C.	EXISTING WETLAND				
	UTILITY LEGEND				
	FIRE MAIN				
VETLAND 4	W WATER				
80' BUFFER	PROCESS SEWER				
	— — GRIT SUMP COLLECTION				
	OVERHEAD POWER LINE				
	P UNDERGROUND POWER LIN	IE			
	NATURAL GAS				
VETLAND 4	EARTHWORK QUANTITIES NORTH WOOD CHIP AREA: 130,730 SF (3.00 ACRE) CUT = 5,678 CY FILL = 32,943 CY				
	SOUTH WOOD CHIP AREA, PECO DOCK, WAI 340,088 SF (7.81 ACRE) CUT = 32,676 CY FILL = 20,788 CY	REHOUSE, AND PIERS:			
AND 5					
		50 100 DXIMATE SCALE IN FEET			
	ONSUMER OPERATIONS LLC	DATE 10/19/22			
CAMAS, WASHINGTON AS SHOWN					
PLAN - PECO DOCK, DOCK WAREHOUSE, 194-0117					
AND DOCK WAREHOUSE PIERS					
		5			