



**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

June 28, 2023

Lauren Hollenbeck, Senior Planner
City of Camas, Community Development Dept.
616 NE 4th Avenue
Camas, WA 98607

**RE: Response to Georgia Pacific In-water Over-water removal project
(SHOR23-01) Letter 2 Dated June 12, 2023 Requesting Additional
Information Relating to the SEPA Application Submitted on March
30, 2023.**

Dear Ms. Hollenbeck,

Please find attached the additional information requested in your June 12, 2023 letter regarding the City of Camas review of our SEPA application and continued support in permitting Georgia Pacific's proposed *In-Water and Overwater Structures Removal Project*.

The City identified a number of items in your letter dated April 18, 2023 requiring additional information which we believe have been addressed. Table 1 provides our response to each of the items noted as necessary for completeness and followed by a number of corresponding attachments.

Table 1. Response to Items Necessary for Application Completeness from Letter 2.

| Item # | Items necessary for completeness | GP Response to City of Camas Comments |
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| 1 | Per the pre-application notes, the \$848.00 critical areas review fee is for each type of critical area. The pre-application notes identified 4 types of critical areas to be reviewed (Fish and Wildlife Habitat Conservation Areas, Frequently Flooded Areas, Wetlands and Geologically Hazardous Areas). One critical area review fee was submitted and therefore the remaining critical area review fee required is \$2,544.00 (\$848.00 x 3). The critical area fee was paid on June 17 th . | The remaining critical area fee was paid on June 17 th . |

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| 2 | <p>Per SMP Appendix B Section VI.B.2 and per the pre-application notes, a current (within thirty days prior to application) mailing list and mailing labels of owners of real property within three hundred (300) feet of the subject parcel, certified and created by the Clark County assessor.</p> <p>The mailing list provided does not appear to be certified by the Clark County assessor.</p> | <p>Please find attached the requested certified mailing list and labels provided by Clark County.</p> |
| 3 | <p>Per SMP Appendix B Section VI.B.5, "The narrative shall respond to the applicable Program policies that will be affected by the proposed development or action and how the proposal complies with the regulations of the Program." In addition, the pre-application notes also stated, "the required narrative shall demonstrate compliance with the applicable Shoreline Master Program policies and regulations of the SMP."</p> <p>Specifically, the following Shoreline Master Program policies and regulations shall be addressed in a narrative:</p> <ul style="list-style-type: none"> * Section 5.7.2- Clearing, Grading, Fill, Excavation * Section 6.4.2.1- Dredging * Section 6.4.2.2- Dredge Material Disposal *Section 6.4.5- Shoreline Stabilization - General | <p>The Shoreline Master Program provides reference to Best Management Practices and permitting restrictions. The Narrative currently states: <i>"A Shoreline Report has been completed for the Project in compliance with requirements and addresses how Project activities potentially impact shoreline and meet compliance requirements for the City's Shoreline Master Program."</i> General BMPs are listed in Section 6.0.</p> <p>To explicitly address the City's comment, we have added text following this statement in the Narrative (see Section 7.2 of the attached updated Appendix 1-Project Narrative) which states: <i>"This includes the requirements found in Section 5.7.2 (i.e., Clearing, Grading, Fill, Excavation), Section 6.4.2.1 (i.e., Dredging), Section 6.4.2.2 (i.e., Dredge Material Disposal), and Section 6.4.5 (i.e., Shoreline Stabilization – General) of the City's Shoreline Master Program. Note that most of the requirements of Section 6.4.5 would not apply to this Project as the Project does not involve the establishment of "new or enlarged structural shoreline stabilization measures."</i></p> <p>Below we have highlighted some of the issues and topics considered in regard to each of these four sections of the Shoreline Master Program; however, we do not believe that additional changes to the Shoreline Report are warranted:</p> |

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| | | <ul style="list-style-type: none"> • Section 5.7.2 (Fill) of the Shoreline Master Program <ul style="list-style-type: none"> ○ The Project appears to be in compliance with the requirements found in this section of the Shoreline Master Program' including fill which is addressed in other supporting documents (e.g., Appendices 10, 11, and 12). ○ The Shoreline Report does say "Approved clean, suitable fill material would be used to cover the retained lower columns and create river bottom contours that match the natural riverbed in this previously dredged location, resulting in restored shallow, nearshore river habitat." Approved fills would be screened as described in Appendix 10 and any subsequent approved plan by DMMO prior to use as required by Section 5.7.2 of the Shoreline Master Program. ○ The Shoreline Report also states that "Ecology has assigned soils on the main Mill parcel as Site No. 15156 for potential presence of hazardous substances regulated under Washington State's Model Toxics Control Act. The presence of contaminants on the parcel has not been evaluated at this time, and no other contaminated or potentially contaminated sites are listed in the Project's action area. ○ The Shoreline Report also notes that "the action of |
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| | | <p>removing treated wood pilings and dolphins may result in a temporary release of contaminants through disturbance of contaminated sediment and exposure of previously buried treated wood, which can act as fresh creosote upon exposure to oxygen in the water (Seattle Public Utilities 2015). Potential effects on aquatic habitats as a result of disturbance of contaminated sediments are expected to be insignificant based on the age of most of the pilings and would not be discernible on the individual level.”</p> <ul style="list-style-type: none"> • Sections 6.4.2.1 (Dredging) and 6.4.2.2 (Dredging and Material Disposal) of the Shoreline Master Program: <ul style="list-style-type: none"> ○ Section 1.6.1 of the Project’s Shoreline Report addresses many of the requirements in Sections 6.4.2.1 of the Shoreline Master Program. A revised SAP is currently in review and the DMMO approve and a suitability determination of dredged materials will be made to by the DMMO which is in compliance with the requirements of Section 6.4.2.2 of the Shoreline Mater Program. • Section 6.4.5 (Shoreline Stabilization – General) of the Shoreline Master Program <ul style="list-style-type: none"> ○ Most of the measures and requirements found in this Section would not directly apply to the Camas Project |
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| | | as the requirements in this section relate to "new, expanded, or enlarged structural shoreline stabilization measures," whereas this project is proposing to remove shoreline features not adding new/expanded/enlarged shoreline features/measures. However, Appendix 12 provides the best management practices that would likely be used. |
| 4 | Per SMP Appendix B Section VII.A and B, provide example of sign content for City review and approval prior to sign installation. Include the list of City permits requested on the sign. | Please see the revised version of the signage indicating the list of requested permits and reviews by the City of Camas. |

If you have any question, please feel free to contact me at (404) 406-5246, or via email at Samantha.McDowell@gapac.com.



Sam McDowell, P.E.
Environmental Manager
Georgia-Pacific

Cc: Matt Tiller-Georgia-Pacific
Steve Negri-Tetra Tech, Inc.

Attachments:

- Item 2-** Clark County Certified Mailing List and Labels
- Item 3-** Updated Appendix 1-Project Narrative (Clean and Redline Versions)
- Item 4-** Signage Example (See electronic version PDF)