

**Addendum to Georgia Pacific's Response to the
City's Letter #2 Dated June 12, 2023
(Shoreline Master Program Sections Reviewed at the Request of the City)**

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.

Work is anticipated to span approximately three years, with the actual schedule dependent on the in-water work windows. Ultimately, the demolition schedule will be influenced by weather, river stage, and contractor availability. At this time, demolition is expected to begin in 2023 following receipt of all Project permits and approvals. Project related clearing and grading would be scheduled to minimize adverse impacts to water quality and aquatic life, and would comply with approved in-water work windows (as discussed in the Shoreline Report and displayed in Table 7 of the Project Narrative).

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

Project related clearing and grading would not result in substantial changes to surface water drainage patterns off the Project site and onto adjacent properties (as discussed in the Shoreline Report).

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

Appropriate stormwater and temporary erosion and sediment control plans would be developed which would comply with the City of Camas' erosion control standards and state requirements (see Appendix F of the Shoreline Report).

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

The Applicant will work with the City of Camas on a Temporary Erosion and Sediment Control Plan during the final engineering design of the Project to ensure the plan complies with the City's requirements and ordinances. Proposed BMPs are addressed in the submitted Preliminary Stormwater Management Plan [Appendix 12; Appendix B (BMP 120)] of the original submittal).

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.

The Applicant will work with the City of Camas on a Temporary Erosion and Sediment Control Plan during the final engineering design of the Project to

ensure the plan complies with the City's requirements and ordinances. Proposed BMPs are addressed in the submitted Preliminary Stormwater Management Plan (Appendix 12; Appendix B of the original submittal).

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.

Fill quantities would be minimum to the levels necessary, as specified in this provision (see Tables 14 and 15 of the Shoreline Report for estimated quantities and locations of fill).

7. Soil, gravel or another 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.

It is anticipated that fill materials would be derived from on-site sources. However, if off-site sources are needed, they would be screened and documentation made that they are uncontaminated.

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

Existing soil characteristics in upland fill areas will be determined to confirm soil type to ensure that fill material is consistent with existing conditions and surface permeability to allow surface water penetration to be maintained. As noted in Section 3.0 of the Project Description, the South Wood Chip and North Wood Chip areas will be backfilled with clean specified materials to design grade. Specified material will be consistent with the existing conditions for gradation and permeability. See Figures 5 and 6 of the Preliminary Stormwater Management Plan (Appendix 12 of the original submittal).

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

Fills would be designed and placed to protect shoreline ecological functions, including channel migration processes.

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.

Fill waterward of the OHWM will be for environmental restoration where structure removals occur overwater. As noted in Section 3.3 of the Project Description, at the Berger Crane fill would be used to cover the retained lower columns creating bottom contours that match the adjacent natural riverbed (see Figure 4 of the Project Narrative).

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.

N/A: The Project is not a beach nourishment or enhancement project.

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

Noted

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.

The Applicant will work with the City of Camas on a Temporary Erosion and Sediment Control Plan during the final engineering design of the Project to ensure the plan complies with the City's requirements and ordinances. See Figures 5 and 6 of the Preliminary Stormwater Management Plan (Appendix 12 of the original submittal).

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.

N/A: The Project does not include the conversion of land to non-forestry uses and/or developments.

6.4.2.1 Dredging:

1. New dredging shall be permitted only where it is demonstrated by a qualified professional that the proposed water-dependent or water-related uses will not result in significant or ongoing adverse impacts to water quality, fish and wildlife habitat conservation areas and other critical areas, flood holding capacity, natural drainage and water circulation patterns, significant plant communities, prime agricultural land, and public access to shorelines. When such impacts are unavoidable, they shall be minimized and mitigated such that they result in no net loss of functions.

As noted in Section 4.3 of the Shoreline Report dredging would occur to provide access to the Dock Warehouse piers for removal of the over-water structures and support pilings which is expected to provide long-term benefits to aquatic habitats in the area. Dredged areas will not be backfilled to prevent impact on flood holding capacity, natural drainage and water circulation, and is along the currently industrialized shoreline.

2. Maintenance dredging of established navigation channels and basins shall be restricted to management of previously dredged or existing authorized location, depth and width.

N/A: Dredging will not occur within established navigation channel or basin areas. As noted in Section 1.3 of the Shoreline Report, no part of the project would affect the federal navigation channel.

3. Dredging and dredge disposal shall be prohibited on or in archaeological sites that are listed on the National Register of Historic Places, the Washington Heritage Register, or the Clark County Historic Register until such time that they have been reviewed and approved by the city and the Department of Archaeology and Historic Preservation (DAHP).

N/A: Dredging and dredge disposal will not occur on or in archaeological sites listed on the National Register of Historic Places, the Washington Heritage Register, or the Clark County Historic Register.

4. Dredging shall be prohibited between the OHWM and minus fifteen (-15) feet CRD, unless shallow water habitat will be created to mitigate for the dredging project.

As noted in Section 4.3.1 of the Shoreline Report, dredging is to provide access to the Dock Warehouse piers to remove over-water structures and supporting piles providing long-term benefits to aquatic habitats. As noted in Section 1.6.1 of the Shoreline Report, filling at the Berger Crane Foundation area will create shallow water habitat.

5. New dredging activity is prohibited in the following locations:

- a. Along net positive drift sectors and where geohydraulic-hydraulic processes are active and accretion shore forms would be damaged, altered, or irretrievably lost;
- b. In shoreline areas with bottom materials that are prone to significant sloughing and refilling due to currents or tidal activity which result in the need for continual maintenance dredging;
- c. In habitats identified as critical to the life cycle of officially designated or protected fish, shellfish, or wildlife;

N/A: Dredging is not occurring in active geohydraulic-hydraulic areas, where significant sloughing due to currents or tidal activity will occur or in a habitat critical to fish, shellfish or wildlife life cycle.

6. Dredging and dredge disposal shall be scheduled to protect biological productivity (including but not limited to, fish runs, spawning, and benthic productivity) and to minimize interference with fishing activities. Dredging activities shall not occur in areas

used for commercial fishing (including but not limited to, drift netting and crabbing) during a fishing season unless specifically addressed and mitigated for in the permit.

Dredging will occur within the in-water work window and is not occurring in an area used for commercial fishing. As noted in Section 5.0 of the Project Description dredging will occur within the regulatory in-water work window for the Camas Slough, between August 1 and February 28

7. Dredging techniques that cause minimum dispersal and broadcast of bottom material shall be used, and only the amount of dredging necessary shall be permitted.

Dredging is planned to be limited for only the amount required to provide access for removing over-water structures. As noted in Section 6.1 of the Project Description best practices for dredging will be implemented including, but not limited, to those to minimize sediment loss and turbidity.

8. Dredging waterward of the OHWM shall be permitted only:
 - a. For navigation or navigational access;
 - b. In conjunction with a water-dependent use of water bodies or adjacent shorelands;
 - c. As part of an approved habitat improvement project;
 - d. To improve water flow or water quality, provided that all dredged material shall be contained and managed so as to prevent it from reentering the water;
 - e. In conjunction with a bridge, navigational structure or wastewater treatment facility for which there is a documented public need and where other feasible sites or routes do not exist.

As noted in Section 1.1 of the Project Description Narrative, the purpose of the project includes the removal of structures from state lands enabling termination and/or reduction of a State Aquatic Lands Lease and termination of several State Aquatic Lands easements.

6.4.2.2 Dredge Material Disposal

1. Dredge material disposal shall be avoided. Dredge disposal shall be permitted only where it is demonstrated by a qualified professional that the proposed water-dependent or water related uses will not result in significant or ongoing adverse impacts to water quality, fish and wildlife habitat conservation areas and other critical areas, flood holding capacity, natural drainage and water circulation patterns, significant plant communities, prime agricultural land, and public access to shorelines. When such impacts are unavoidable, they shall be minimized and mitigated such that they result in no net loss of functions.

As noted in Section 6.1 of the Project Description, dredge material disposal will be coordinated with the Dredge Material Management Program for the state of Washington to ensure that dredged sediment will be disposed of at an acceptable location as noted

2. Near shore or landside disposal of dredge materials shall not be located upon, adversely affect, or diminish:
 - a. Stream mouths, wetlands, or significant plant communities (approved mitigation plans may justify exceptions);
 - b. Prime agricultural land except as enhancement;
 - c. Natural resources including but not limited to sand and gravel deposits, timber, or natural recreational beaches and waters except for enhancement purposes;
 - d. Designated or officially recognized wildlife habitat and concentration areas;
 - e. Water quality, quantity, and drainage characteristics; and
 - f. Public access to shorelines and water bodies.

As noted in Section 6.1 of the Project Description if disposed on land and if the material is found suitable it will be disposed of at the Lady Island Dredge Materials Area where dredged material from the Columbia River and Camas Slough has been stored under agreement with the Washington Department of Natural Resources.

3. Dredged material shall be disposed of on land only at sites reviewed and approved by the USACOE and the Shoreline Administrator. Applicants shall demonstrate that the proposed site will ultimately be suitable for a use permitted by this Program. Disposal shall be undertaken such that:
 - a. The smallest possible land area is affected, unless dispersed disposal is authorized as a condition of permit approval for soil enhancement or other purposes;
 - b. Shoreline ecological functions and processes will be preserved, including protection of surface and ground water;
 - c. Erosion, sedimentation, floodwaters or runoff will not increase adverse impacts to shoreline ecological functions and processes or property; and
 - d. Sites will be adequately screened from view of local residents or passersby on public rights-of-way to the maximum extent practicable (e.g., combination of fencing and vegetation). The following conditions shall apply to land disposal sites:

As noted in Section 6.1 of the Project Description if disposed on land and if the material is found suitable it will be disposed of at the Lady Island Dredge Materials Area where dredged material from the Columbia River and Camas Slough has been stored under agreement with the Washington Department of Natural Resources.

4. The following conditions shall apply to land disposal sites:
 - a. Underground springs and aquifers shall be identified and protected.
 - b. Containment dikes and adequate settling basins shall be built and maintained so that the water discharged from the site carries a minimum of suspended sediment. Required basins shall be designed to maintain at least one foot of standing water at all times to encourage proper settling.
 - c. Proper diversion of surface discharge shall be provided to maintain the integrity of the natural streams, wetlands, and drainage ways.
 - d. There shall be a single point of ingress and egress for removal of the de-watered material.
 - e. Runoff shall be directed through grassy swales or other treatment features that assures protection of water quality and a location that maximizes circulation and fishing.
 - f. Sites shall be revegetated with appropriate native species as soon as possible to retard erosion and restore wildlife habitat and other critical areas functions;
 - g. Vegetation shall be maintained to ensure continued existence by the property owner; and
 - h. Dredge materials deposited upland and not part of a permitted dike or levee shall constitute fill, and when deposited within the jurisdiction of this Program, shall comply with the fill regulations.

As noted in section 6.1 of the Project Description, sediment sampling and analysis is planned to evaluate sediment quality and determine suitability for reuse or disposal. Coordination with the City and other agencies will be done regarding any reuse at the site. Dredged material, if disposed at an upland facility, will be disposed of at the Lady Island Dredge Materials Area where dredged material from the Camas Slough and Columbia River have been stored under agreement with the Washington Department of Natural Resources. If used as fill at the site all requirements of the shoreline program will be adhered to.

5. Dredged material shall be disposed of in water only at sites approved by the USACOE and the Administrator. Disposal techniques that cause minimum dispersal and broadcast of bottom material shall be used, and only if:

- a. Land disposal is infeasible, less consistent with this Program, or prohibited by law;
- b. Nearshore disposal as part of a program to restore or enhance shoreline ecological functions and processes is not feasible;
- c. Offshore habitat will be protected, restored, or enhanced;
- d. Adverse effects on water quality or biologic resources from contaminated materials will be mitigated;
- e. Shifting and dispersal of spoil will be minimal; and
- f. Water quality will not be adversely affected.

As noted in section 6.1 of the Project Description dredged material, if disposed of in water, will be disposed in coordination and with approval of the DMMP. Disposal will be done in a manner that minimizes dispersal and impacts to water quality.

- 6. The deposition of dredged materials in water or wetlands shall be permitted only:
 - a. To improve wildlife habitat;
 - b. To correct material distribution problems adversely affecting fish habitat;
 - c. To create, expand, rehabilitate, or enhance a beach when permitted under this Program and any required state or federal permit;
 - d. When land deposition is demonstrated to be more detrimental to shoreline resources than water deposition; or
 - e. In approved, open-water disposal sites.

Dredged material will not be disposed of in wetland areas. In water disposal of dredged material, if done, will be coordinated with the DMMO and the City of Camas.

6.4.1 General Requirements:

- 1. Structural shoreline modifications shall only be allowed where it can be demonstrated that the proposed activities are necessary to support or protect allowed legally existing shoreline use or primary structure that is in danger of loss or substantial damage or are necessary for reconfiguration of the shoreline or bed lands for an allowed water-dependent use or for shoreline mitigation or enhancement purposes.

As described in the Shoreline Report and the Project Narrative, the purpose of the Project is to abate, remove, and demolish structures associated with former

riverfront operations of the pulp and paper mill which are no longer utilized. The existence of these structures is in compliance with legally allowed activities and shoreline use. As discussed below (for item 2) implementation of this Project would enhance shoreline condition in the area.

2. Modifications shall only be allowed when impacts are avoided, minimized, and mitigated to assure no net loss of shoreline ecological functions.

As described in the Shoreline Report and the Project Narrative, the Project would result in an increase in shoreline ecological function, as the purpose of the Project is to abate, remove, and demolish structures associated with former riverfront operations of the pulp and paper mill which are no longer utilized. As a result, the shoreline conditions would be moved to a more "natural" and less disturbed condition long-term following the Project's completion.

3. 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.

Project related in-water work would be scheduled to minimize adverse impacts to water quality and aquatic life and would conform to in-water work windows (as discussed in the Shoreline Report and displayed in Table 7 of the Project Narrative).

6.4.5 Shoreline Stabilization – General:

1. New shoreline stabilization for new development is prohibited unless it can be demonstrated that the proposed use cannot be developed without shore protection or is necessary to restore ecological functions or hazardous substance remediation.

N/A: The Project involves the removal of existing shoreline structures, not the addition or creation of new shoreline structures or stabilization features.

2. Pursuant to WAC 173-26-231(3) (a) (B), new or enlarged structural shoreline stabilization measures for an existing primary structure, including residences, should not be allowed unless there is conclusive evidence, documented by a geotechnical analysis, that the structure is in danger from shoreline erosion caused by tidal action, currents, or waves not, for example, from upland conditions such as poorly managed stormwater or vegetation removal. Normal sloughing, erosion of steep bluffs, or shoreline erosion itself, without a scientific or geotechnical analysis, is not demonstration of need. The geotechnical analysis should evaluate on-site drainage issues and address drainage problems away from the shoreline edge before considering structural shoreline stabilization. The erosion control structure will not result in a net loss of shoreline ecological functions.

N/A: The Project does not include new or enlarged shoreline structures or stabilization features.

3. Proposed designs for new or expanded shore stabilization shall be designed in accordance with applicable Ecology and WDFW guidelines using best available science. The applicant shall provide the following information in a report by a qualified professional: (a) evidence that alternative solutions (non-structural) are not feasible or do not provide sufficient protection; and (b) demonstrate that future stabilization measures would not be required on the project site.

N/A: The Project does not include new or expanded shore structures or stabilization features.

4. Land subdivisions or lot line adjustments shall be designed to assure that future development of the newly-created lots will not require structural stabilization for subsequent development to occur.

N/A: The Project does not include land subdivisions or lot line adjustments.

5. New or expanded structural shoreline stabilization for existing structures (e.g. roads, railroads, public facilities) is prohibited unless there is conclusive evidence documented by a geotechnical analysis that there is a significant possibility that the structure will be damaged within three years as a result of shoreline erosion caused by stream processor waves, and only when significant adverse impacts are mitigated to ensure no net loss of shoreline ecological functions or processes.

N/A: The Project does not include new or expanded structural shoreline stabilization for existing structures.

6. Replacement of an existing shoreline stabilization structure with a similar structure is permitted if there is a demonstrated need to protect existing primary uses, structures or public facilities (e.g., roads, bridges, railways, and utility systems) from erosion caused by stream undercutting or wave action; provided that the existing shoreline stabilization structure is removed from the shoreline as part of the replacement activity. Proposed designs for new or expanded shore stabilization shall be designed in accordance with applicable Ecology and WDFW guidelines and certified by a qualified professional.

N/A: The Project does not include the replacement of an existing shoreline stabilization structure.

7. Replacement walls or bulkheads shall not encroach waterward of the ordinary high water mark or existing structure unless the residence was occupied prior to January 1, 1992, and there is overriding safety or environmental concerns. In such cases, the replacement structure shall abut the existing shoreline stabilization structure.

N/A: The Project does not include the replacement of walls or bulkheads.

8. Where a geotechnical analysis confirms a need to prevent potential damage to a primary structure, but the need is not as immediate as three years, the analysis may still be used to justify more immediate authorization for shoreline stabilization using bioengineering approaches.

Noted

9. Shoreline stabilization projects that are part of a fish habitat enhancement project meeting the criteria of RCW 77.55.181 may be exempt and regulated under the state process. Stabilization projects that are not part of such a fish enhancement project will be regulated by this Program.

N/A: The Project is not a shoreline stabilization project that is part of a fish habitat enhancement effort.

10. Small-scale or uncomplicated shoreline stabilization projects (e.g., tree planting projects) shall be reviewed by a qualified professional to ensure that the project has been designed using best available science.

N/A: The Project is not a “small-scale or uncomplicated shoreline stabilization project,” however, the analysis presented in the application was prepared by qualified professionals (as discussed in the Shoreline Report).

11. Large-scale or more complex shoreline stabilization projects (e.g., Projects requiring fill or excavation, placing objects in the water, or hardening the bank) shall be designed by a qualified professional using best available science. The city may require that a qualified professional monitor construction or to construct the project.

The Project was designed by qualified professionals using best available science. The Applicant acknowledges that the City of Camas may require that separate third party qualified professionals monitor construction of the Project.

12. If the project is publicly funded then it must include appropriate provisions for public access to the shoreline, not create barriers to public access if in existence, and incorporate ecological restoration measures if feasible.

N/A: The Project is not publicly funded.

13. Standards for new stabilization structures when found to be necessary include limiting the size to minimum, using measures to assure no net loss of shoreline ecological functions, using soft approaches, and mitigating for impacts.

N/A: The Project does not include new stabilization structures.

5.4 Flood Prevention and Flood Damage Minimization:

1. Development in floodplains shall not significantly or cumulatively increase flood hazard or be inconsistent with an adopted comprehensive flood hazard management plan.

The Project would not significantly or cumulatively increase flood hazard or be inconsistent with an adopted comprehensive flood hazard management plan. The analysis supporting this is presented in the Project’s “Frequently Flooded Areas Report and Flood Hazard Assessment” and the “Certification of No-Rise Report for Removal of Structures along Camas Slough.”

2. New development or uses in the shoreline jurisdiction, including subdivision of land, shall not be established when it would be reasonably foreseeable that the development or use would require structural flood hazard reduction measures within the channel migration zone or floodway.

N/A: It is not reasonably foreseeable that the development or use of the Project would require structural flood hazard reduction measures within the channel migration zone or floodway (see the Project's "Frequently Flooded Areas Report and Flood Hazard Assessment" and the "Certification of No-Rise Report for Removal of Structures along Camas Slough" reports).

3. Allow new structural flood hazard reduction measures in the shoreline jurisdiction only when it can be demonstrated by scientific and engineering analysis that they are necessary to protect existing development, that non-structural measures are not feasible, and that impacts ecological function and priority species and habitats can be successfully mitigated so as to assure no net loss of shoreline ecological function.

N/A: Then Project does not involve or require new structural flood hazard reduction measures (see the Project's "Frequently Flooded Areas Report and Flood Hazard Assessment" and the "Certification of No-Rise Report for Removal of Structures along Camas Slough" reports).

4. The areas of special flood hazard 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). The study is the official report provided by the Federal Insurance Administration that includes flood profiles, the Flood Insurance Rate Maps, and the water surface elevation of the base flood. The study and FIRM are on file at the City of Camas (616 NE 4th Avenue, Camas, WA) and the City website (www.cityofcamas.us). The best available information for flood hazard area identification as outlined in CMC Section 16.57.050(I) shall be the basis for regulation until a new FIRM is issued that incorporates data utilized. In addition, Map 27 Potential Channel Migration Zone (CMZ) Areas (Inventory and Characterization Report Volume 1, Lewis and Salmon-Washougal is hereby incorporated by reference.

Noted

5. When necessary, in-stream structures shall be located, designed, and maintained in such a manner that minimizes flood potential and the damage affected by flooding.

N/A: The Project involves the removal of existing shoreline structures, not the addition or creation of new in-stream structures.

6. Fills shall be avoided in the shoreline and in critical areas or buffers except where the applicant clearly demonstrates that the geohydraulic characteristics will not be altered in a way that increases flood velocity or risk of damage. See Section 5.7.2 of this Program for additional and specific requirements for fills placement. Pile or pier supports or other support methods shall be utilized instead of fills whenever feasible.

As noted in the Shoreline Report the project has been designed to avoid and minimize impacts to the shoreline and critical areas to the extent possible. Permanent impacts to the Shoreline areas would result from placement of fill where the riverbank and riverbed would be shaped to new shallow nearshore topographic contours following removals; however, the Project would reduce the overall amount of previously placed artificial fill along the riverbank.

7. Dikes and levees shall not be placed in the floodway except for current deflectors necessary for protection of bridges and roads.

N/A: The Project involves the removal of existing shoreline structures, not the addition or creation of new dikes or levees.

8. Removal of gravel for flood management purposes shall be consistent with the adopted flood hazard reduction plan, the provisions of this Program, and only allowed after a biological and geomorphological study determines that extraction has a long-term flood hazard reduction benefit and does not result in net loss of ecological functions.

N/A: The Project does not include the removal of gravel for flood management purposes.

9. Removal of beaver dams to control or limit flooding shall be avoided where feasible and allowed only in coordination with WDFW and receipt of all applicable state permits.

N/A: The Project does not include the removal of beaver dams to control or limit flooding.

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:

1. Non-conforming uses and development within the shoreline jurisdiction shall be subject to both this Program and Appendix C, and where there is a conflict, the most protective of environmental functions shall apply;

See response below.

2. The Fish and Wildlife Habitat Conservation Area buffers for Stream Type S in Appendix C, Section 16.61.040 are modified as follows for the following areas:

- a. Columbia River, SR-14 to SE Third Avenue² at twenty-feet (20’).

See response below.

- b. Washougal River, lots fronting on First Avenue between SE Garfield Street and NE Third Street, twenty-feet (20') from the top of slopes exceeding forty-percent (40%).

See response below.

- c. Lacamas Lake buffers from OHWM shall not extend landward of NE Leadbetter Road.

See response below.

- d. Columbia River, lots fronting on SE 12th Avenue and SE 11th Avenue between SE Polk Street and SE Front Street, shall be twenty-percent (20%) of lot depth as measured from the OHWM.

See response below.

- 3. CMC Chapter 16.57 Frequently Flooded Areas applies within shoreline jurisdiction but is not incorporated as specific regulations of this SMP.

See response below.

Sub-Section 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.

See response below.

Sub-Section 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.

See response below.

- 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.

See response below.

- 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.

See response below.

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 a permit or written statement of exemption is required.

See response below.

5. If provisions of Appendix C and other parts of this Program conflict, the provisions most protective of ecological and historic resources shall apply.

See response below.

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.

See response below.

7. In addition to compensatory mitigation, unavoidable adverse impacts may be addressed through restoration efforts.

The following responds to the provisions listed above for Critical Areas. Appendix C of the Camas Shoreline Master Program, as adopted by Ordinance No. 21-003, defines critical areas. These include Wetlands; Critical Aquifer Recharge Areas; Frequently Flooded Areas; Geologically Hazardous Areas; and Fish and Wildlife Habitat Conservation Areas. The Project's potential effects on these critical areas, as well as how the Project has been designed and would be implemented in compliance with the city and county's critical areas ordinances is addressed in various Project related documents. These include:

- The "Shoreline and Critical Areas Review and Impacts Assessment"¹, which addresses wetlands critical areas as well as fish and wildlife habitat conservation areas.*
- The "Geologically Hazardous Area and Critical Aquifer Recharge Review - Addendum to the Shoreline and Critical Areas Review and Impacts Assessment," which addresses geologically hazardous areas and critical aquifer recharge areas.*
- The "Frequently Flooded Areas Report and Flood Hazard Assessment for Demolition of Encroachments," the "Certification of No-Rise and Description of Flood Hazard for Demolition of One Dolphin," and the "No-Rise Report for*

¹ This document has been prepared to meet the requirements of the City of Camas and Clark County Shoreline Master Programs and requirements for critical areas reports (Camas Municipal Code [CMC] 16.51.140 and Clark County Code [CCC] 40.440, 40.450, and 40.460). It has also been developed to provide information relevant to the SEPA process.

Removal of Structures along Camas Slough,” which addresses frequently flooded areas.

- *The “Biological Assessment,” which further addresses fish and wildlife habitat conservation areas (in addition to the information provided in the “Shoreline and Critical Areas Review and Impacts Assessment”)*

As discussed in these documents, the Project has been designed to avoid and minimize impacts to critical areas to the extent possible, and measures have been proposed to minimize impacts when complete avoidance is not possible. In addition, the assessments and measure proposed to address the critical areas ordinances for the City of Camas would also address critical areas as defined by Clark County.

4.3.5.4 Management Policies:

In addition to the other applicable policies and regulations of this Program the following management policies shall apply:

1. Promote infill and redevelopment in developed shoreline areas with the goal of achieving full utilization of the shoreline, while encouraging environmental remediation and restoration of the shoreline, where applicable.

The Project would not promote the “infill” and/or “redevelopment” of the shoreline area, as the purpose of the Project is to abate, remove, and demolish structures associated with former riverfront operations of the pulp and paper mill which are no longer utilized. However, as described in the Shoreline Report and the Project Narrative, the Project would promote the environmental remediation and restoration of the shoreline.

2. Encourage the transition of uses from non-water-oriented to water-oriented uses.

N/A: The Project would not have an effect on the non-water-oriented versus water-oriented uses of the area.

3. Water-oriented uses are encouraged, however new non-water-oriented uses may be allowed.

N/A: The Project would not have an effect on the non-water-oriented versus water-oriented uses of the area.

4. Visual or physical public access should be a priority. Where possible, industrial and commercial facilities should be designed to permit pedestrian waterfront activities.

N/A: The Project would not have an effect on the public’s access to the affected area (as public access to the area is currently restricted).

4.3.4 Medium Intensity Shoreline Designation:

Note that only Sub-Sections 4.3.4.3 and 4.3.4.4 are applicable to the Project (as Sub-Section 4.3.4.1 and 4.3.4.2 appear to contain term definitions and the purpose of the designations).

Sub-Section 4.3.4.3 Areas Designated:

1. The Medium Intensity shoreline designation applies to areas as shown on a copy of the Camas Shoreline Designations Map in Appendix A.

Noted

2. The Medium Intensity shoreline designation in the northeast portion of Lacamas Lake is intended to provide a center for mixed use development including:

- a. Water dependent uses that increase the public's ability to enjoy public waters.

Noted

- b. Water oriented uses as part of mixed-use development that increase opportunities for commercial and higher intensity residential use in a design that improves the public's ability to enjoy the physical and aesthetic qualities of the shoreline.

Noted

- c. To mitigate adverse impacts of higher intensity, use on the shoreline, and the cumulative impacts of anticipated development of the contiguous upland parcel, no development approval shall be granted until substantial development permits are approved that include:

- i) Designation of the general mix of uses and facilities that improve the public's ability to enjoy the qualities of the shoreline.

N/A: The Project would have no direct effect on the "public's ability to enjoy the qualities of the shoreline" as no public access is currently granted to this area; however, the Project would increase the ecological condition of the area, which could have indirect benefits to the "public's ability to enjoy the qualities of the shoreline."

- ii) Relocation of the existing Leadbetter Road landward of its existing location to provide a minimum 100-foot shoreline buffer outside of the MI area together with removal of the road subgrade and provision of soil substrate and planting a community of native vegetation equivalent to a native climax forest.

N/A: The Project does not affect the location of the existing Leadbetter Road.

- iii) Provision of a public trail parallel to the shoreline located to minimize impacts on ecological functions within the restored buffer area and including connections perpendicular to the water to provide direct access to the water's edge for uses such as fishing or viewing.

N/A: The Project does not affect the public's access to the water's edge for uses such as fishing or viewing.

Sub-Section 4.3.4.4 Management Policies:

In addition to the other applicable policies and regulations of this Program the following management policies shall apply:

1. The scale and density of new uses and development should be compatible with sustaining shoreline ecological functions and processes, and the existing residential character of the area.

The Project would improve the ecological functions and processes of the shoreline, but would have no effect on the existing residential character of the area.

2. Public access and joint use (rather than individual) of recreational facilities should be promoted.

N/A: The Project would not have an effect on the public's access to the affected area (see previous responses)

3. Access, utilities, and public services to serve proposed development within shorelines should be constructed outside shorelines to the extent feasible and be the minimum necessary to adequately serve existing needs and planned future development.

N/A: The Project does not involve the development of new access, utilities, and public services.

4. Public or private outdoor recreation facilities should be provided with proposals for subdivision development and encouraged with all shoreline development if compatible with the character of the area. Priority should be given first to water dependent and then to water-enjoyment recreation facilities.

N/A: The Project is not a new "shoreline development," and instead is a proposal to abate, remove, and demolish structures associated with former riverfront operations of the pulp and paper mill which are no longer utilized.

5. Commercial development should be limited to water-oriented uses. Non-water oriented commercial uses should only be allowed as part of mixed-use developments where the primary use is residential and where there is a substantial public benefit with respect to the goals and policies of this Program such as providing public access or restoring degraded shorelines.

As noted in the Shoreline Report the Project will provide a benefit to the Shoreline environment through the removal of river obstructions; removal of creosote pilings; removal of debris and providing new shallow water habitat. Removal of infrastructure that is no longer used will increase safety for public accessing the waterway.

4.3.1.4 Management Policies:

In addition to the other applicable policies and regulations of this Program the following management policies shall apply:

1. New over-water structures should be allowed only for water-dependent uses or ecological restoration.

N/A: The Project does not include new over-water structures (see previous responses).

2. Shoreline uses and modifications should be designed and managed to prevent degradation of water quality and natural hydrographic conditions.

The Project has been designed to prevent degradation of water quality and natural hydrographic conditions (see the Shoreline Report). Once implemented, the Project is expected to increase shoreline ecological function, by removing structures associated with former riverfront operations of the pulp and paper mill which are no longer utilized.

3. In-water uses should be allowed where impacts can be mitigated to ensure no net loss of ecological functions. Permitted in-water uses must be managed to avoid impacts to shoreline functions. Unavoidable impacts must be minimized and mitigated.

The Project is expected to result in an increase in ecological functions (see previous responses).

4. 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.

The purpose of the Project is to abate, remove, and demolish structures associated with former riverfront operations of the pulp and paper mill which are no longer utilized. As a result, the Project is not expected to adversely affect surface navigation, impact public views in the long term, or impede fish and wildlife movement.

5. Multiple or shared use of over-water and water access facilities should be encouraged to reduce the impacts of shoreline development and increase effective use of water resources.

N/A: The Project would not create new over-water structures (see previous responses).

6. Structures and activities permitted should be related in size, form, design, and intensity of use to those permitted in the immediately adjacent upland area. The size of new over-water structures should be limited to the minimum necessary to support the structure's intended use.

N/A: The Project would not create new over-water structures (see previous responses).

7. Natural light should be allowed to penetrate to the extent necessary to discourage salmonid predation and to support nearshore habitat unless other illumination is required by state or federal agencies.

The Project involves the abatement, removal, and demolition of structures associated with former riverfront operations of the pulp and paper mill which are no longer utilized. As a result, light levels in the affected area would be expected to increase, not decrease, following completion of the Project.

8. Aquaculture practices should be encouraged in those waters and beds most suitable for such use. Aquaculture should be discouraged where it would adversely affect the strength or viability of native stocks or unreasonably interfere with navigation.

N/A: The Project does not include aquaculture practices.

9. Given that the aquatic designation is waterward of the OHWM, then when the proposed use, development, activity or modification requires use of adjacent upland property, then it must also be allowed within the upland shoreline designation.

Noted