

SHORELINE CRITICAL AREAS REPORT



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Camas Well 13 PFAS
Treatment Design

January 22, 2025

MSi Project No. 18581

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Camas Well 13 PFAS Treatment Design

Shoreline Critical Areas Report

Wetland Scientist Signature

Prepared by:
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Signature
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Printed Name
January 22, 2025
Date

1. Introduction

This report details the results of critical areas investigations conducted for the City of Camas (City) by MacKay Sposito (MSi) to address the Environmental Protection Agency's poly-fluoroalkyl substance (PFAS) requirements by building a new PFAS treatment facility and associated infrastructure on the existing Well 13 site.

This shoreline critical areas report describes the current conditions and the extent of wetlands and fish and wildlife habitat conservation areas (FWHCA) regulated locally by:

- Camas, Washington Municipal Code (CMC) Chapter 16.53 Wetlands and Chapter 16.61 FWHCA
- Camas Shoreline Master Program (SMP 2021)

1.1 Location

Location information for the project study area (PSA) for the Camas PFAS project (Project) is provided in Table 1 and a vicinity map is provided in Appendix A.

Table 1. Location of the PSA

Location	PSA Information				
City	Camas				
County	Clark				
Situs Address 135 SE Cramer Ln, Camas, Washington 98607					
PLSS	Township 01N, Range 03E, Section 11, NE ¼				
PLSS	Township 01N, Range 03E, Section 12, NW ¼				
PSA Area (acres)	1.40				
Tax Lot ID(s)	90928000, 91031000, 91034000				

1.2 Project Description

The applicant proposes to construct a new PFAS treatment facility and associated infrastructure on the existing Well 13 site. Project elements include:

Stage 1

- Removal of the existing Well 4 building (Well 4 has been previously decommissioned)
- Replace the existing generator and expand the existing generator pad at the existing Well 13
- Install per- and poly-fluoroalkyl substances (PFAS) treatment equipment for the existing Well 13
- Expand the existing Well 13 electrical room
- Building addition (utility transformer pad) for a proposed new well
- A new driveway off E. 1st Avenue to facilitate a pump crane truck
- Construct a 5-foot wide concrete sidewalk along SE Cramer Lane

Stage 2

Construction of a new water well and chemical room in the northern portion of the site as an
extension of the new electrical room built as part of Stage 1

2. Landscape Setting, Land Use, and Existing Conditions

2.1 Site Description

The PSA includes two buildings, an abandoned well (Well 4) and Well 13. Surrounding land use to the north, east, and west consists of high-density residential development, with Lacamas Creek to the south. The topography gently slopes to the south-southeast but is generally level in the north and central portions. The southern portion of the PSA, waterward of the top of the bank, slopes steeply (58 percent slopes) toward Lacamas Creek. Vegetation in the north and central portion of the PSA consists of landscaped and ornamental native and non-native trees and shrubs, a native balsam poplar (*Populus balsamifera*) and black walnut (*Juglans nigra*). Typical lawn species, mixed with a small percentage of other herbaceous plants, are present and routinely mowed and maintained throughout. Vegetation in the southern portion of the PSA consists of one Oregon white oak (*Quercus garryana*), Douglas fir (*Pseudotsuga menziesii*), cottonwood, and beaked hazelnut (*Corylus cornuta*) within the greenway at the top of the bank and Himalayan blackberry (*Rubus armeniacus*) along the steep slopes. Lacamas Creek, a Type S stream, is a shoreline of state-wide significance and runs along the southern PSA boundary.

2.2 Site Alterations

Elevated roads (E 1st Ave and SE Cramer Ln) are located on the north and east sides of the PSA, respectively. A gravel path bisects the PSA from east to west within the central portion. These roads divert surface water flows from historical paths. Historic gravel fill material is present throughout the PSA, altering hydrology. Development within the PSA and surrounding area has increased stormwater runoff and reduced groundwater recharge.

3. Methods

3.1 Desktop Review

Prior to the May 2, 2024, site visit, MSi conducted a desktop review of potential critical areas within the PSA. Resources reviewed (Appendix A) included:

- Aerial photos (ESRI 2023)
- Clark County GIS MapsOnline (Clarky County 2024)
- Water Quality Atlas (Ecology 2024)

- LiDAR digital terrain model (DTM) and digital surface model (DSM); (WDNR 2019)
- National Oceanic and Atmospheric Administration (NOAA) Fisheries West Coast Region Web Map (NOAA 2024a)
- NOAA Regional Climate Centers (NOAA 2024b)
- USDA Web Soil Survey (NRCS 2024)
- US Army Corps of Engineers (USACE) Antecedent Precipitation Tool (APT)(USACE 2024)
- US Fish and Wildlife Service (USFWS) Information for Planning and Consultation (IPaC)(USFWS 2024a)
- USFWS National Wetlands Inventory (NWI)(USFWS 2024b)
- Washington Department of Fish and Wildlife (WDFW) Priority Habitat and Species (PHS)(WDFW 2024a)
- Statewide Washington Integrated Fish Distribution (SWIFD) Web Map (WDFW 2024b)
- Washington Department of Natural Resources (WDNR) Washington Natural Heritage Program
 Data Explorer Web Map (WDNR 2024a)

3.2 Wetland Delineation

MSi Wetland Scientists conducted field investigations on May 2, 2024. The Western Mountains, Valleys, and Coasts Regional Supplement (USACE 2010) to the routine method outlined in the USACE's Wetland Delineation Manual (Environmental Laboratory 1987) was utilized to determine if wetlands were present. The USACE National Wetland Plant List (USACE 2022) was used to determine the indicator status of plant species identified within sample plots. The Munsell Soil Color Chart (Munsell Color 2009) was used to determine soil colors. Precipitation analysis was accomplished using the USACE APT for the 2023-2024 water year (USACE 2024a).

The location of the sample plots (Appendix B) was collected using a backpack-mounted Juniper Geode GPS Unit with an estimated accuracy within three feet, but they were not flagged due to their locations within a regularly mowed and maintained lawn. Ground-level photos were taken throughout the PSA to document representative conditions and observed critical areas (Appendix CAppendix C).

MSi wetland scientists met onsite with Meghan Flounlacker from Ecology, Joy Peplinski from WDFW, and Rob Charles from the City of Camas (Pers. Comm. 2024) on August 5, 2024, to discuss site conditions and the future construction of the (PFAS) treatment facility and associated infrastructure.

3.3 Fish and Wildlife Habitat Conservation Areas

3.3.1 Riparian Habitat Areas

Riparian Priority Habitat was identified by delineating the ordinary high-water mark (OHWM) of all legally accessible waterbodies within approximately 150 feet of the PSA (the largest buffer that could be

applied to riparian priority habitat). The location of the OHWM was determined using Ecology's methodology (Ecology 2016). The OHWM was identified using a combination of indicators, including undercut banks, vegetation transitions, breaks in slope, matted vegetation in the direction of flow, and watermarks. The field-delineated OHWM elevations were tied to LiDAR-derived contours (WDNR 2019) to extrapolate the full OHWM in locations where safety concerns prevented access due to steep slopes in the southeast corner of the PSA.

The location of the OHWM was collected using a backpack-mounted Juniper Geode GPS Unit with an estimated accuracy within three feet. Ground-level photos were taken throughout the PSA to document representative conditions and observed critical areas (Appendix C).

3.3.2 Listed Species and Priority Habitats and Species

During the desktop review, listed species, priority habitats, and species potentially present within the PSA were identified. During the site visits on May 2, 2024, suitable habitat for species identified during the desktop review were evaluated on-site during fieldwork using the best available science and professional judgment.

4. Results

4.1 Desktop Review

4.1.1 Precipitation Analysis

Precipitation was average (normal) for the three months preceding the field investigation, with an APT score of 11/18. Table 2 summarizes actual precipitation for the PSA, compared to the 30-year normal, for the May 2, 2024, site visit.

Table 2. Antecedent Precipitation Analysis for May 2, 2024

Date of				Precipitation	(inches)					
Site Visit	Day of Site	2 Weeks		3 Months Prior						
	Visit	Prior	Month	Actual	30-70% of Normal	Within Normal Range				
			March	6.11	2.70-4.74	Wet				
5/2/24	0.28	1.83	April	3.10	3.46-4.83	Dry				
			May	2.86	2.85-4.05	Normal				

Sources: USACE 2024, NOAA 2024

4.1.2 Wetlands

The NWI (USFWS 2024b) and Clark County MapsOnline (Clark County 2024) identify potential wetland presence in Lacamas Creek's general location. MSi agrees with the mapping as it relates to the general location of Lacamas Creek (Appendix A, Figure 2).

4.1.3 Fish and Wildlife Habitat Conservation Areas

Clark County MapsOnline (Clark County 2024) identifies Lacamas Creek as a Shoreline of the State (WDNR Type S) and associated riparian habitat. PHS on the Web identifies salmonids within Lacamas Creek as well as steep slopes and Biodiversity Areas and Corridor associated with Lacamas Creek. MSi staff generally agree with the location of Lacamas Creek and its associated riparian habitat and the mapping of steep slopes. Salmonids are assumed to be present within Lacamas Creek (Appendix A, Figure 2).

4.2 Field Results

4.2.1 Wetlands

No wetlands were observed within the PSA. Special attention was paid to the microtopography as the north and central portions of the PSA are generally level. Two sample plots were taken within areas that appeared to sit lower in the landscape (not depressions) to document vegetation, soil, and hydrology conditions; these sample plots showed upland conditions (Appendix B).

4.2.2 Fish and Wildlife Habitat Conservation Areas

Lacamas Creek (Type S) is mapped at the southern extent of the PSA. The standard riparian buffer for a Type S stream is 150 feet (CMC 16.61.040.D), however; the City of Camas SMP 5.3.(2)(b) states that the FWHCA buffers lots fronting on First Avenue between SE Garfield St. and NE Third St., are modified to 20 feet from the top of slopes exceeding 40 percent (the PSA is located between SE Garfield St. and NE Third St. and slopes are approximately 58%). Shoreline management areas extend landward 200 feet on a horizontal plane from the OHWM and are under the jurisdiction of the City of Camas SMP (2021).

Table 3. Lacamas Creek FWHCA Summary

Attribute	Description
Feature ID/Name	Lacamas Creek
FWHCA Type	Water of the State
WDNR Stream Type	Type S
SED	Medium Intensity
Stream Buffer Width	20 feet
Substrate	Boulders, cobbles, silt, and sand
Average Width	Bankfull width approximately 90 feet between north and south OHWMs
Channel Condition	Steep stable banks (approximately 58 percent slopes)
Fish Access	Yes
OHWM	The OHWM was delineated using debris wracking, sediment deposits, surface water
Determination	matted vegetation in the direction of flow.
Riparian Conditions	Within the PSA, dominant riparian vegetation consists of balsam poplar, black walnu annual bluegrass (<i>Poa annua</i>), common dandelion (<i>Taraxacum officinale</i>), common selfheal (<i>Prunella vulgaris</i>), creeping buttercup (<i>Ranunculus repens</i>), and common d (<i>Bellis perennis</i>). Himalayan blackberry (<i>Rubus armeniacus</i>) dominates the bank slop
Figure Location	Appendix A, Figure 2. Existing Conditions

Sources: CCMC 16.61.010, Clark County 2024, City of Camas SMP 5.3.(2)(b), City of Camas SMP (2021)

4.2.3 Priority Habitat and Species

4.2.3.1 Listed Species

No terrestrial species identified by the USFWS IPaC database as potentially present were observed within the PSA, and no suitable habitats for these species were observed within or near the PSA (USFWS 2024a). Listed threatened fish are mapped within Lacamas Creek (Table 4) and assumed to be present.

Table 4. State and Federally Listed, Threatened, Endangered, and Sensitive Species

Species	Species Run	Scientific Name	State Status	Federal Status						
Lacamas Creek River										
Chinook [Lower Columbia River ESU]	Fall Chinook	Oncorhynchus tshawytscha		Threatened						
Coho [Lower Columbia River ESU]	Coho	Oncorhynchus kisutch		Threatened						
Steelhead [Lower Columbia River ESU]	Summer Steelhead Winter Steelhead	Oncorhynchus mykiss	Candidate	Threatened						
Chum [Columbia River ESU]	Fall Chum	Oncorhynchus keta		Threatened						
Dolly Varden/ Bull Trout		Salvelinus confluentus	Candidate	Threatened						

Sources: NOAA 2024a, WDFW 2024b, WDFW 2024c, USFWS 2024a

4.2.3.2 Oregon White Oak

Oregon White Oak Woodlands are considered stands of oak or oak/conifer associations where canopy coverage of the oak component of the stand is 25% or where total canopy coverage of the stand is <25%, but oak accounts for at least 50% of the canopy coverage. In non-urbanized areas west of the Cascades, priority oak habitat consists of stands greater than one acre in size. In urban or urbanizing areas, single oaks or stands less than one acre may also be considered a priority when found particularly valuable to fish and wildlife (WDFW 2024).

One oak (Oak 1) measuring approximately 26 inches in diameter at breast height (dbh) was mapped in the southern portion of the PSA. Based on the WDFW functional assessment for individual oak trees, Oak 1 scored Medium Function (Nolan and Azerrad 2024). The functional assessment for Oak 1 is provided in Table 2.

Table 5. Functional Assessment for Individual Oregon White Oak Trees

Oak ID	DBH (inches)	Condition of Crown	Wildlife Value	Score
Oak 1	26	Suppressed/stunted	Leaves, dead branches	8

^{*}High Function = Score 10; Medium Function = Score of 7-9; Low Function = Score 4-6; Minimal Function = Score ≤3

5. Impact Assessment

All permanent and temporary impacts to wetland and fish and wildlife habitat conservation areas will be avoided; no trees, or shrubs will be removed within the stream buffer, biodiversity area, or Oregon white oak dripline (Appendix A, Figure 3). As there are no permanent or temporary impacts to wetland and fish and wildlife habitat conservation area critical areas, no restoration or mitigation for these natural resources is proposed.

6. Disclaimer

The boundaries and classifications shown in this report have been determined using the most appropriate field techniques and the best professional judgment of the environmental scientist. It should be noted that Ecology and/or the City have the final authority to determine the boundaries and categories under their respective jurisdictions. All boundaries and associated buffers should be considered preliminary until they gain concurrence from the appropriate agencies. We recommend submitting this report to the agencies for concurrence prior to purchasing a property, starting any development, or planning activities that would affect regulated critical areas and shorelines on this site.

7. References

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 Program Data Explorer Web Map.
 https://experience.arcgis.com/experience/174566100f2a47bebe56db3f0f78b5d9/page/Rare-Plant
 - and-Ecosystem-Locations/.

Appendix A

Maps

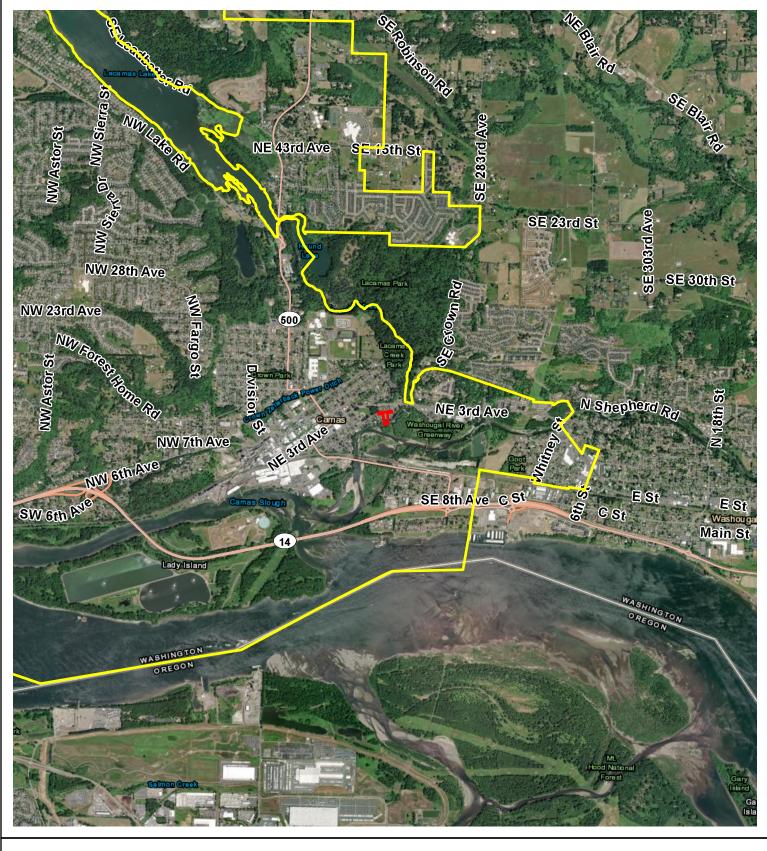
Figure 1. Vicinity Map

Figure 2. Existing Conditions

Figure 3. Proposed Conditions

Figure 4. NWI and LWI

Figure 5. NRCS Soils



Data Sources: Basemap by ESRI. City Limits by Clark County. All other data created by MacKay Sposito. 1/8/2025 Camas City Limits
PSA Boundary (1.40 acres)

PSA Location: 45.6006846, -122.4303372

Figure 1. Vicinity Map

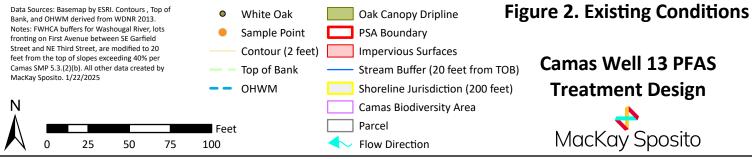
Camas Well 13 PFAS Treatment Design



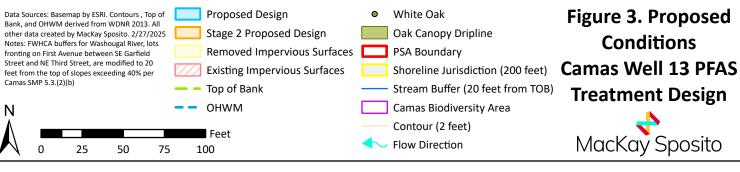


Miles 1/4 1/2 3/4 1



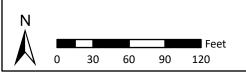












PSA Boundary
Wetlands Presence
Freshwater Emergent Wetland
Freshwater Forested/Shrub Wetland

Riverine

Figure 4. NWI and LWI

Camas Well 13 PFAS Treatment Design





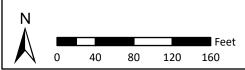
Data Sources: Basemap by ESRI. Soils by NRCS. PSA created by MacKay Sposito. 1/8/2025

NRCS Soil Map Units
PSA Boundary
*No hydric soils in the PSA

Figure 5. NRCS Soils

Camas Well 13 PFAS Treatment Design





Appendix B

Wetland Determination Data Forms

WETLAND DETERMINATION DATA FORM - Western Mountains, Valleys, & Coast

Drain at/Cita	,	Comes DEAC		City/Cover	4.	Camaa Clark	. Can	nalina Data	05/02/	2004
Project/Site: Applicant/Owner:			of Camas	City/Couri			San San			
· · · · —				Castian T	Taumahin Danga		: Washington San			1
		Brian Nikolas					S12, T1		Clana (0/)	1
Landform (hillslope,					ef (concave, con			D-t	·-	
Subregion (LRR):		Α			587959					JS 84
Soil Map Unit Name			Fill Land				NWI classification:		Jpland	
Are climatic / nydroi	logic conditions on	the site typical for this	time of year?	Yes X	NO	(If no, ex	plain in Remarks.)		V N	
Are vegetation	, Soii	, or Hydrology , or Hydrology	significantly	disturbed	? Are		nstances" present?		X No	
						•	any answers in Rem	•		
SUMMARY OF	FINDINGS - A	ttach site map sh	owing sam	pling po	oint locations	s, transects	<u>, important feat</u>	ures, etc.		
Hydrophytic Vege	etation Present?	Yes	No X	_						
Hydric Soil Prese	ent?	Yes	No X	_	Is the Sample	d Area				
Wetland Hydrolog	gy Present?	Yes	No X	_	within a Wetla	ind?	Yes	No X	_	
		on was chosen based c		pographic	position (not a d	depression) with	in the landscape.			
VEGETATION -	Use scientific	names of plants	•			Т				
						Dominan	ce Test worksheet:			
			Absolute	Domina	ant Indicator	Number o	f Dominant Species			
Tree Stratum (I	Plot size: 3	30-ft)	% Cover	Species	s? Status	That Are 0	OBL, FACW, or FAC:	<u> </u>	2	(A)
Quercus garry			10	Yes	FACU	_				
2.						Total Num	ber of Dominant			
2						Species A	cross All Strata:		6	(B)
4.						-				
			10	= Total	Cover	Percent of	f Dominant Species			
Sapling/Shrub St	ratum (Plot size	: 5-ft)				That Are 0	OBL, FACW, or FAC:	3	3.0	(A/B)
Acer circinatur			5	Yes	s FAC					
Vaccinium ova			2	Yes		Prevalenc	ce Index worksheet			
3. Berberis vulga			2	Yes		Total	% Cover of:		ply by:	_
						OBL spec	ies	_ x 1 =		_
5.						FACW spe	ecies	_ x 2 =	0	_
			9	= Total	Cover	FAC speci	ies	_ x 3 =	0	_
Herb Stratum (I	Plot size:	5-ft)		_		FACU spe		_ x 4 =	0	_
1. Poa annua		,	63	Yes	s FAC	UPL speci	es	_ x 5 =	0	_
Bellis perennis	S		20	Yes		Column To	otals:	(A)		_ (B)
3. Hypochaeris r			10	No	FACU	-				
4. Taraxacum of			5	No		- Pre	valence Index = B/A	=	0.0	_
5. Geranium diss			2	No						
6.							tic Vegetation Indic			
7.							apid Test for Hydroph		on	
							ominance Test is >50			
9.							revalence Index ≤3.0			
10.							orphological Adaptat		e supportir	ng
11.							etland Non-Vascular			
···-			100	= Total	Cover	– <u> </u>	ematic Hydrophytic \	√egetation¹ (E	Explain)	
Woody Vine Strat	tum (Plot size:	30-ft)	100	10tai	OOVCI					
							s of hydric soil and w			
2.						be presen	t, unless disturbed o	r problematic		
Z				= Total	Cover	- 11	-4! -			
% Para Cround in	n Herb Statum	0		= 10(a)	Covei	Hydrophy				
% bale Glouliu ii	THEID Statum	<u> </u>				Vegetatio		NI-	V	
						Present?	Yes	No _	<u> </u>	
Remarks:										
romano.										

OIL								Sampling Point:	001		
Profile Deser	intion: (Describe	o the depth nee	dad to document t	ho indicator	or confirm	the abcon	oo of indicator	rc \			
	•	o the depth net			or commi	the absen	ce of indicator	15.)			
Depth											
(inches)			Color (moist)		Type¹	Loc²	Texture				
0-6	10YR 3/4	100		0			Silt Loam	See Remarks			
							,				
-	-							-			
-											
								· -			
							-				
								<u>.</u> .			
	-										
ype: C=Con	In Description: (Describe to the depth needed to document the Indicator or confirm the absence of Indicators) In Matrix										
dric Soil In	ndicators: (Applica	hle to all I PRs	unless otherwise	noted)			Indicator	s for Problematic Hydric Sc	vile3.		
		ible to all LIXIXS		-				-	, iii		
	` '							· ·			
_											
Black His	stic (A3)		Loamy Mu	ucky Mineral ((F1) (excep	ot MLRA 1)	v	ery Shallow Dark Surface (TF	F12)		
Hydroger	n Sulfide (A4)		Loamy Gl	eyed Matrix (F	F2)		0	ther (Explain in Remarks)			
Depleted	Below Dark Surface	e (A11)	Depleted	Matrix (F3)							
Thick Da	rk Surface (A12)		Redox Da	rk Surface (F	6)		³Indica	ators of hydrophytic vegetation	n and		
_				-	•						
_	• • • •							• •			
_ Ourldy Or	eyed Matrix (O+)			.pressions (1 c			u	The 33 distarbed of problemation	···		
strictive La	ayer (if present):										
Type:											
Depth (inc	ches):	6					Hydric Soil F	Present? Yes	No X		
-			ck all that apply)				Secon	dary Indicators (minimum of t	wo required		
•				ined Leaves ((R9) (exce	ent					
_					. , .	-pt	_ `	` , `			
					140)		_	·			
_											
_	` '			-			·				
Sediment	t Deposits (B2)		Hydrogen	Sulfide Odor	(C1)		Saturation Visible on Aerial Imagery (C9)				
Drift Depo	osits (B3)		Oxidized I	Rhizospheres	along Living	g Roots (C3	3) G	Seomorphic Position (D2)			
Algal Mat	t or Crust (B4)		Presence	of Reduced II	ron (C4)		s	hallow Aquitard (D3)			
Iron Depo	osits (B5)		Recent Iro	n Reduction i	in Tilled Soil	ls (C6)	E	AC-Neutral Test (D5)			
_						, ,		` ,	R A)		
_	` ,	Imageny (R7)				(=::::/:/		` , `	,		
_		. , ,	Other (LX	piaiii iii ixeiiia	iino)		_ '	Tost-Heave Hummocks (D1)			
_ Sparsely	vegetated Concav	e Surface (Bo)									
eld Observa	ations:										
rface Water	Present?	Yes N	o X Depth (ir	nches):							
iter Table P	resent?	Yes N		· —							
				· —		Wetlan	d Hydrology I	Present? Yes	No ¥		
			Dopai (ii			1.700.001	, 0.0 99 1	100			
	mary iringe)										
escribe Reco	orded Data (stream	gauge, monitori	ng well, aerial photo	s, previous in	spections),	if available:					
marka											
emarks:											

WETLAND DETERMINATION DATA FORM - Western Mountains, Valleys, & Coast

Project/Site:	Camas PFAS		City/County	y:	Camas, Clark	Samr	pling Date:	05/02/2024
Applicant/Owner:		City of Camas			State: Washing			
Investigator(s):	Sara Hastings, Brian Nikolas		Section, To	wnship, Range:		S12, T1N	i, R3E	
Landform (hillslope, terrae	ce, etc): Terr	ace	Local relief	(concave, conv	ex, none):	convex		Slope (%): <1
Subregion (LRR):	A							
Soil Map Unit Name:		Fill Land			NWI class	fication:	U	Jpland
	conditions on the site typical fo				(If no, explain in Re	marks.)		
Are Vegetation	, Soil, or Hydrology	significantly	y disturbed?	Are "	'Normal Circumstances"	present?	Yes	X No
	, Soil, or Hydrology				eeded, explain any answ			
SUMMARY OF FINE	DINGS - Attach site ma	p showing sam	pling poi	int locations	, transects, import	ant featu	ıres, etc.	
Hydrophytic Vegetation	Present? Yes	X No						
Hydric Soil Present?		No X		Is the Sampled	Area			
Wetland Hydrology Pre	sent? Yes	No X	_ ,	within a Wetlar	nd? Yes _		No X	<u></u>
	ole plot was taken in the lowes		n (not a dep	ression) within t	he landscape.			
VEGETATION - Use	scientific names of pl	ants.			1			
					Dominance Test w	orksheet:		
		Absolute	Dominar	nt Indicator	Number of Dominar	t Species		
Tree Stratum (Plot si	ze:)	% Cover	Species	? Status	That Are OBL, FAC	N, or FAC:		2 (A)
Populus balsamifera	a ssp. trichocarpa	40	Yes					
2. Juglans nigra		20	Yes		Total Number of Do			
3					Species Across All S	Strata:		3 (B)
4								
		60	= Total C	Cover	Percent of Dominan	•		
	(Plot size: 5-ft				That Are OBL, FAC	N, or FAC:	6	7.0 (A/B)
1					Prevalence Index v	vorksheet.		
2.					Total % Cover			ply by:
3.					OBL species	01.	x 1 =	Siy by.
					· · · · · · · · · · · · · · · · · · ·			0
5					FAC species		x 3 =	0
Harb Stratum (Diat ai	70: E ft \	0	= Total C	over	FACU species		x 4 =	
1. Poa annua	ze:)	20	Yes	FAC	UPL species		x 5 =	0
2. Prunella vulgaris			No	FACU	Column Totals:		(A)	(B)
3. Taraxacum officinale	•		No No	FACU FACU				
4. Ranunculus repens	-		No	FAC	Prevalence In	dex = B/A =	C	0.0
5. Bellis perennis		2	No	UPL				
6.					Hydrophytic Veget			
_					1 - Rapid Test f			on
8.					X 2 - Dominance			
9.					3 - Prevalence			
40					4 - Morphologic	-	•	e supporting
11.		-			5 - Wetland No			T
		34	= Total C	Cover	Problematic Hy	aropnytic ve	egetation' (E	-xpiain)
Woody Vine Stratum	(Plot size: 30-ft)			11 maliantary of budgin	مينا ممطييم	امتاميط امتحالا	
		_			¹Indicators of hydric			
2.					be present, unless of	isturbed or	problematic.	•
% Bare Ground in Herb		0	= Total C	Cover	Hydrophytic Vegetation			
					Present?	Yes _ >	X No	
								
Remarks:								

SOIL								Sampling Point: 0	002		
D61- D		. 41141	4 44-		- - -	. 41 1		\			
	ription: (Describe t	o tne aeptn ne	eded to document th	ie indicator	or confirm	i the absen	ice of indicator	rs.)			
Depth	Matrix		Redox	Features							
(inches)	Color (moist)	%	Color (moist)	%	Type ¹	Loc ²	Texture	Remarks			
0-10	10YR 3/2	100		0			Silt Loam	Gravel and other small aggregate			
			40)/D 5/0								
10-16	10YR 3/3	99	10YR 5/8	1	<u>C</u>	M	Silt Loam	No gravel/aggregate in this layer			
					<u> </u>						
-	·		-				•				
-	· (
47 0 0											
Type: C=Co	ncentration, D=Depie	etion, Rivi=Real	iced Matrix, CS=Cove	ered or Coate	ea Sana Gr	ains.	LOC	ation: PL=Pore Lining, M=Matrix.			
Hydric Soil I	ndicators: (Applica	ble to all LRRs	s, unless otherwise n	noted.)			Indicator	s for Problematic Hydric Soils ³ :			
Histosol	(A1)		Sandy Red	lox (S5)			2	cm Muck (A10)			
	pipedon (A2)		Stripped M					Red Parent Material (TF2)			
Black H	istic (A3)		Loamy Mud	cky Mineral (⊢1) (exce	pt MLRA 1)	∨	ery Shallow Dark Surface (TF12)			
Hydroge	en Sulfide (A4)		Loamy Gle	yed Matrix (F	=2)		C	Other (Explain in Remarks)			
 Deplete	d Below Dark Surfac	e (A11)	Depleted M	latrix (F3)							
		0 (/ 11 1)			C \		31!:				
	ark Surface (A12)			k Surface (F	•			ators of hydrophytic vegetation and			
Sandy N	Mucky Mineral (S1)		Depleted D	ark Surface	(F7)		W	etland hydrology must be present,			
Sandy C	Gleyed Matrix (S4)		Redox Dep	ressions (F8	3)		u	nless disturbed or problematic.			
			<u> </u>					·			
Restrictive L	_ayer (if present):										
	, (p,-										
Type:											
Depth (in	iches):						Hydric Soil F	Present? Yes No _	X		
Remarks:											
	Evidence of fill mate	rial from 0-10 in	iches below ground si	urface.							
HYDROLOG	Y										
Wetland Hyd	drology Indicators:										
Primary Indic	cators (minimum of o	ne required; che	eck all that apply)				Secon	dary Indicators (minimum of two requ	uired)		
	Water (A1)			ned Leaves ((B9) (exc	ent		Vater-Stained Leaves (B9) (MLRA 1	1 2		
					. , .	ept			1, 2,		
High Wa	ater Table (A2)		MLRA 1	1, 2, 4A, and	l 4B)			4A, and 4B)			
Saturati	on (A3)		Salt Crust ((B11)			Drainage Patterns (B10)				
Water M	larks (B1)		Aquatic Inv	ertebrates (E	313)			Ory-Season Water Table (C2)			
	` '			-				• • • • • • • • • • • • • • • • • • • •	20)		
	nt Deposits (B2)			Sulfide Odor				saturation Visible on Aerial Imagery (C	59)		
Drift De	posits (B3)		Oxidized R	hizospheres	along Livir	ng Roots (C	3) G	Geomorphic Position (D2)			
Algal Ma	at or Crust (B4)		Presence of	of Reduced In	ron (C4)		s	shallow Aquitard (D3)			
						ile (C6)					
	posits (B5)			n Reduction i				AC-Neutral Test (D5)			
Surface	Soil Cracks (B6)		Stunted or	Stressed Pla	ants (D1)	(LRR A)	R	Raised Ant Mounds (D6) (LRR A)			
Inundati	on Visible on Aerial I	magery (B7)	Other (Exp	lain in Rema	ırks)		F	rost-Heave Hummocks (D7)			
	y Vegetated Concave		_ ` '		,			,			
Oparaci	y vegetated concave	Couriace (DO)									
Field Observ	vations:										
Surface Water	er Present?	Yes N	No X Depth (inc	ches):		_					
Water Table I	Present?	Yes N	No X Depth (inc	ches):							
Saturation Pr			lo X Depth (inc	· -		Wotlan	nd Hydrology I	Procent? Voc No	V		
		Yes N	no X Debin (ini			vvetiai	na nyarology i	Present? Yes No _			
(includes cap	oillary fringe)										
Describe Red	corded Data (stream	gauge, monitor	ing well, aerial photos	, previous in	spections),	if available	:				
Remarks:											

Appendix C

Ground Level Color Photographs



Photo 1

The photo was taken during the May 2, 2024, field visit facing west in the northeast corner of the PSA. General vegetation consists of frequently mowed grasses and herbaceous species, while landscaping consists of native and non-native tree and shrub species.





Photo 2

This photo was taken during the May 2, 2024, field visit facing north in the west-central portion of the PSA. Well 13 is pictured at the top right of the photo, with stormwater grates pictured at the bottom of the photo.





Photo 3

This photo was taken during the May 2, 2024, field visit facing south in the southwest portion of the PSA toward the top of the steep bank of Lacamas Creek within the stream buffer. Riparian habitat consists of routinely mowed and maintained lawn and landscaping, creating low ecological function. No impacts within the stream buffer are proposed.





Photo 4

Photo of an Oregon white oak (*Quercus garryana*) taken during the May 2, 2024, field visit in the southern portion of the PSA within the Lacamas Creek stream buffer. The Oregon white oak measured 26 inches in diameter at breast height (dbh) with a suppressed/stunted crown due to the nearby Douglas fir. The Oregon white oak will be entirely avoided by the project.





Photo 5

Photo of the gravel access path at the northern extent of the Lacamas Creek stream buffer taken on May 2, 2024, facing west in the southern portion of the PSA. The steep slope and Lacamas Creek are to the left of the photo.





Photo 6

Photo of abandoned well (Well 4 building), which will be removed by the project, taken on May 2, 2024, facing northwest in the southern portion of the PSA. Well 13 pictured at photo right.





Photo 7

The photo was taken on May 2, 2024, facing north in the southeast portion of the PSA. Well 13 is pictured center-left, and shared driveway access (SE Cramer Lane) is at right.





Photo 8

Photo taken on May 2, 2024, facing west in the south portion of the PSA along Lacamas Creek. Evidence of debris wracking, one of the indicators used to determine the ordinary high water mark, is pictured above the tree in the center of the photo.



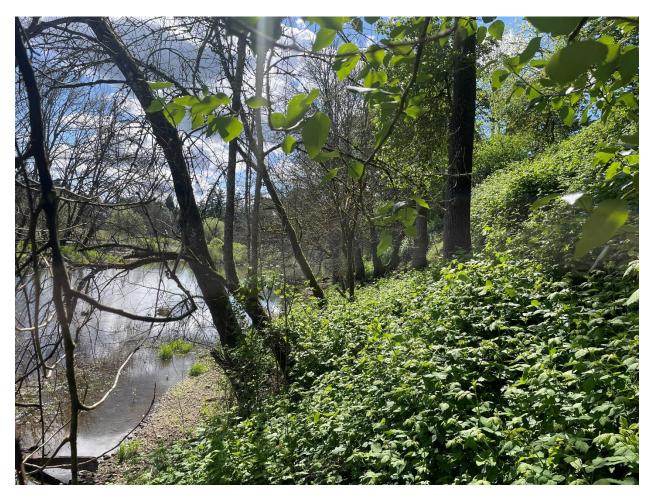


Photo 9

Photo taken on May 2, 2024, facing west in the southeastern portion of the PSA along the shoreline of Lacamas Creek. Invasive Himalayan blackberry (*Rubus armeniacus*) dominates the steep slope.





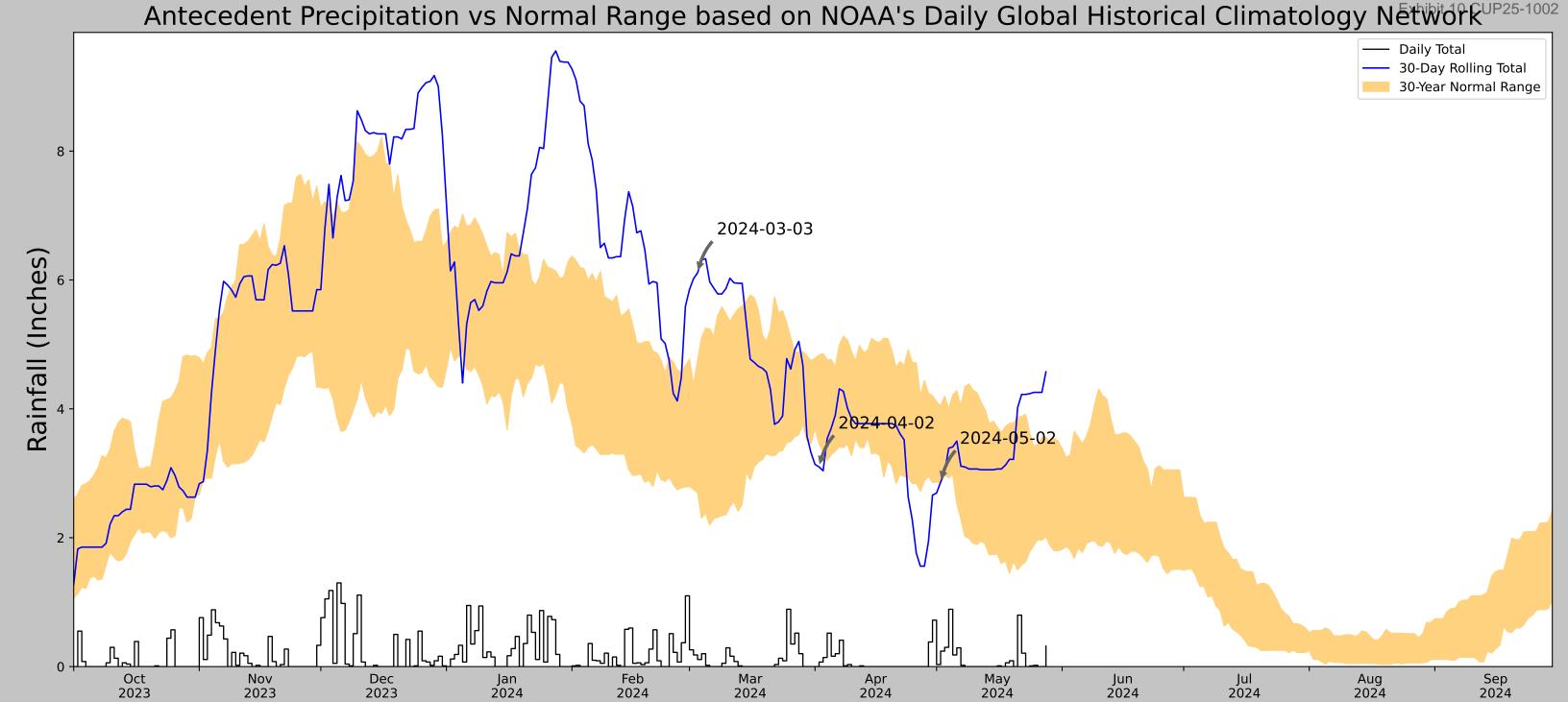
Photo 10

Photo taken on May 2, 2024, facing northeast in the southeastern portion of the PSA along the shoreline of Lacamas Creek. Invasive blackberry brambles cover the steep slopes, and high-density housing is pictured along the top of the slope.



Appendix D

USACE Antecedent Precipitation Tool



Coordinates	45.587959, -122.393633
Observation Date	2024-05-02
Elevation (ft)	59.644
Drought Index (PDSI)	Moderate drought (2024-04)
WebWIMP H ₂ O Balance	Wet Season

30 Days Ending	30 th %ile (in)	70 th %ile (in)	Observed (in)	Wetness Condition	Condition Value	Month Weight	Product
2024-05-02	2.846063	4.049213	2.862205	Normal	2	3	6
2024-04-02	3.458662	4.834252	3.098425	Dry	1	2	2
2024-03-03	2.701575	4.743307	6.110236	Wet	3	1	3
Result							Normal Conditions - 11



Figures and tables made by the Antecedent Precipitation Tool Version 2.0

Developed by: U.S. Army Corps of Engineers and U.S. Army Engineer Research and Development Center

Weather Station Name	Coordinates	Elevation (ft)	Distance (mi)	Elevation Δ	Weighted Δ	Days Normal	Days Antecedent
PORTLAND TROUTDALE AP	45.5511, -122.4097	24.934	2.663	34.71	1.291	9198	81
TROUTDALE	45.5533, -122.3886	33.136	1.032	8.202	0.473	1738	1
CAMAS 2.4 E	45.5845, -122.374	58.071	2.882	33.137	1.392	3	8
PORTLAND WFO	45.5608, -122.5383	20.997	6.258	3.937	2.841	315	0
PORTLAND INTL AP	45.5958, -122.6092	21.982	10.131	2.952	4.589	98	0







www.mackaysposito.com

Camas Well 13 PFAS Treatment Design

February 28, 2025

MSi Project No. 18581

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2. Appendices

Appendix A – Figures

Appendix B – Site Plan

i



Camas Well 13 PFAS Treatment Design Shoreline Narrative Wetland Scientist Signature

Prepared by:

Knota K. Currens
Signature
Kristen Currens Printed Name
February 28, 2025
Date

1. Introduction

1.1 Purpose

The following document presents a Shoreline Conditional Use Permit Narrative (Narrative) prepared by MacKay Sposito (MSi) for the City of Camas (Applicant) and the Camas Well 13 PFAS Treatment Design Project (Project). The Narrative discusses the proposed development, current conditions, and how the Project will meet the development regulations codified in the Camas Shoreline Master Program (SMP 2021).

On August 5, 2024, MSi scientists met onsite with Meghan Flounlacker from Ecology, Joy Peplinski from WDFW, and Rob Charles from the City of Camas (Pers. Comm. 2024) to discuss site conditions and the future construction of the PFAS treatment facility and associated infrastructure. This site visit was also held to support Ecology's conditional use review and solicit their input early in the project design.

1.2 Project Description/Background

The Applicant proposes constructing a new per- and poly-fluoroalkyl substances (PFAS) treatment facility and associated infrastructure on the existing Well 13 site. Project activities include:

Stage 1

- Removal of the existing Well 4 building (Well 4 has been previously decommissioned);
- Replace the existing generator and expand the existing generator pad at the existing Well 13;
- Install per- and poly-fluoroalkyl substances (PFAS) treatment equipment for the existing Well 13;
- Expand the existing Well 13 electrical room;
- Building addition for a proposed new well;
- A new driveway off E. 1st Avenue to facilitate a pump crane truck

Stage 2

• Construction of a new water well and chemical room in the northern portion of the site as an extension of the new electrical room built as part of Stage 1.

1.3 Existing Conditions

Existing conditions on-site include two buildings, an abandoned well (Well 4), and an existing well (Well 13). Surrounding land use to the north, east, and west consists of high-density residential development, with Lacamas Creek to the south. The topography gently slopes to the south-southeast but is generally level in the north and central portions of the project site. Waterward from the top of the bank, the southern portion of the project site slopes steeply (58 percent slopes) to the south toward Lacamas Creek.

Vegetation in the north and central portion of the Project consists of landscaped and ornamental native and non-native trees (a native balsam poplar (*Populus balsamifera*) and black walnut (*Juglans nigra*)) and shrubs. Typical lawn species, mixed with a small percentage of other herbaceous plants, are present and routinely mowed and maintained throughout the central and northern portions of the shoreline jurisdiction. Vegetation in the southern portion of the Project consists of one Oregon white oak (*Quercus garryana*) and a mix of Douglas fir (*Pseudotsuga menziesii*), balsam poplar, and beaked hazelnut (*Corylus cornuta*) within the greenway at the top of the bank. Himalayan blackberry (*Rubus armeniacus*) dominates the steep slopes above Lacamas Creek (a Type S stream and shoreline of state-wide significance), which flows from east to west along the southern project site boundary.

1.4 Shoreline Designation and Required Setbacks

The project site is adjacent to Lacamas Creek, with a shoreline environmental designation (SED) of Medium Intensity. Utilities are a conditional use within the Medium Intensity shoreline designation, with a minimum setback of 50 feet from the Right-of-way (ROW) and a maximum structure height of 35 feet. This project is located more than 50 feet from the ordinary high water mark of Lacamas Creek, and its maximum structure height is 25 feet.

Table 1. Shoreline Use, Modification, and Development Standards (SMP Table 6-1)

SED	Use	Use per SED	Right-of-Way Setback (ft)	Maximum structure height (ft)
Medium Intensity	Utility	Conditional	50	35

2. Applicable Shoreline Master Program Regulations

The SMP code responses below assess how this Project meets the goals and policies of the Camas SMP. Excerpts from the SMP are in *italics* below, with responses in regular blue font. Only regulations that apply to the Project are addressed.

2.1 Chapter 5 General Shoreline Use and Development Regulations

All uses and development activities in shorelines shall be subject to the following general regulations in addition to the applicable use-specific regulations in Chapter 6.

2.1.1 5.1 General Shoreline Use and Development Regulations

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

Water-dependent development is not proposed with this project.

- 2. Shoreline uses and developments shall not cause impacts that require remedial action or loss of shoreline functions on other properties.
 - This Project will not cause impacts that require remedial action or the loss of shoreline functions on other properties.
- 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 that protects public safety and existing primary structures.
 - Shoreline development will occur approximately 31 feet from the top of the bank. Shoreline stabilization will not be necessary during the development or in the future.
- 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.
 - No work will be done within the shoreline jurisdiction prior to approval of this Shoreline Conditional Permit.
- 5. 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.
 - Development will not occur until the City reviews and approves that the proposed application meets the requirements of CMC Title 17 Land Development and CMC Title 18 Zoning.
- 6. 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.
 - PFAS are present in the groundwater supply. The new PFAS treatment equipment contains a resin media that will remove the PFAS via absorption until the resin is depleted, after which; the resin will be removed from the site and hauled away for off-site incineration within an approved facility. Once the old resin is removed, new resin will be added.
 - Additionally, the on-site generator will contain fuel in case of a power outage.
 - All hazardous materials will be stored and maintained in safe and leak-proof containers, as local, state, and federal regulations require.

7. 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 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.

Existing impervious surfaces (buildings and impermeable asphalt and gravel surfaces) total 0.06 acres within shoreline jurisdiction. With the removal of the Well 4 building, 0.01 acre are proposed to change from impervious to pervious. The proposed facility and infrastructure construction will increase to 0.09 acre of impervious surfaces post-construction, equating to a 0.03-acre net increase within shoreline jurisdiction in an area composed of regularly maintained non-native lawn grass (MSi 2025). Table 2 summarizes impacts within shoreline jurisdiction.

Table 2. Summary of Impacts within Shoreline Jurisdiction

Existing	Proposed Increase	Proposed Increase	Net Increase	Proposed Total	
Impervious	in Pervious	in Impervious	Impervious	Impervious	
0.06 acres	0.01 acres	0.04 acres	0.03 acres	0.09 acres	

This plan has been prepared according to Ecology's shoreline no net loss and mitigation guidance (Ecology 2023). The Project will not result in the net loss of shoreline ecological functions. All impacts to critical areas and their buffers have been avoided. In addition, the project has been carefully designed to avoid all alteration or removal of native vegetation within shoreline jurisdiction.

While there will be a 0.03-acre increase in impervious surface within shoreline jurisdiction, this increase is necessary to provide the hardened surface infrastructure required to meet the project's purpose of treating the drinking water supply for PFAS. To minimize impacts within shorelines, the Well 4 building will be removed, and the newly created pervious surface that does not overlap with the new development will be covered by permeable river rocks to enhance water infiltration and reduce the environmental impact of impervious surfaces. The design provides a sustainable, low-maintenance solution to manage water flow and support local ecosystems.

Construction best management practices (BMPs) to manage stormwater runoff and minimize erosion and sedimentation will be implemented, which include:

Designate staging and stockpile areas outside critical areas and buffers, establish standard construction entrances, vividly mark clearing limits, and install silt fencing at the edge of the disturbance to prevent sedimentation within remaining critical areas.

8. 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.

No relief from development regulations is requested with this application.

2.2 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.

An archaeological investigation has been completed and will be provided.

2.3 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;
- 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').
 - 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%).
 - c) Lacamas Lake buffers from OHWM shall not extend landward of NE Leadbetter Road.
 - 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.
- 3. CMC Chapter 16.57 Frequently Flooded Areas applies within shoreline jurisdiction but is not incorporated as specific regulations of this SMP.

The standard riparian buffer for a Type S stream is 150 feet (CMC 16.61.040.D); the City of Camas SMP 5.3.(2)(b) states that the Fish and Wildlife Habitat Critical Areas (FWHCA) buffers for lots fronting on First Avenue between SE Garfield St. and NE Third St., are modified to 20 feet from the top of slopes exceeding 40 percent (the PSA is located between SE Garfield St. and NE Third St. and slopes are approximately 58%). A Critical Areas Report is included with the City Land Use Application submittal for review and approval by the City (MSi 2025).

2.3.1.1 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.

All impacts to critical areas will be avoided.

2.4 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.
 - This project will utilize public funding. The public currently accesses the shoreline on this site, and that access will be maintained and upgraded through the construction of a 5-foot wide ADA-accessible sidewalk.
- 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:

Not applicable

- 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.
 - The existing public access will be upgraded through the construction of a 5-foot wide ADA-accessible sidewalk.
- 4. Public access shall include provisions for protecting adjacent properties from trespass and other possible adverse impacts to neighboring properties.
 - The site will be fenced off to screen and provide security for the PFAS equipment. However, there will be no changes to the existing public access. The Applicant proposes a 5-foot wide concrete sidewalk along the east side of the site/west side of SE Cramer Ln to provide additional accessibility to the shoreline area.

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

A sign indicating the public's right to access the shoreline area will be installed and maintained in a conspicuous location.

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

The sidewalk will be constructed concurrently with the proposed project.

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 43 Camas Shoreline Master Program serving as a means of view and/or physical approach to public waters and may include interpretive centers and displays.

The Applicant proposes a 5-foot wide concrete sidewalk along the east side of the site/west side of Cramer Lane to provide additional accessibility to the existing pathway along the greenway. This standard will be met.

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.

The City of Camas owns the property, so an easement will not be required.

2.5 5.6 Restoration

The Project will not impact the existing shoreline or critical areas, so no restoration is proposed.

2.6 5.7 Site Planning and Development

2.6.1 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.

To ensure minimal disruption to the shoreline, the Applicant will submit an Erosion Control plan to the City for approval, implement the approved erosion control measures (BMPs) before grading begins, and limit grading activities within the shoreline jurisdiction to the greatest extent possible.

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

Impervious surfaces created by the development will include:

- Removal of the existing Well 4 building (Well 4 has been previously decommissioned);
- Replace the existing generator and expand the existing generator pad at the existing
 Well 13;

- Install per- and poly-fluoroalkyl substances (PFAS) treatment equipment for the existing
 Well 13:
- Expand the existing Well 13 electrical room;
- Building addition for a proposed new well;
- A new driveway off E. 1st Avenue to facilitate a pump crane truck;
- Construction of a new water well and chemical room in the site's northern portion as an extension of the new electrical room built as part of Stage 1.

The Project will result in 0.07 acres of new impervious surfaces, equating to a 0.06-acre net increase within shoreline jurisdiction. To minimize Impacts within the shoreline, the Well 4 building will be removed, and within the fenced facility and infrastructure, the newly created pervious surface that does not overlap with the new impact footprint will be covered by permeable river rock to enhance water infiltration and reduce the environmental impact of impervious surfaces. This and existing stormwater collection, treatment, and detention systems will protect the facility, neighboring properties, and the shoreline.

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

The Project has existing frontage along 1st Ave and access to SE Cramer Ln.

- 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.
 - Existing frontage access to the property from 1^{st} Ave and SE Cramer Ln. will minimize the amount of grading and vegetation removal required on-site. For more information, see the Preliminary Plans included with the City Land Use (Appendix B Site Plan).
- 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 principal use.
 - Parking and storage will be located within the facility and unavailable for public use. All of these areas will be located landward of the OHWM.
- 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.
 - The water treatment facility will be fenced/walled with an 8-foot high-security palisade fence to provide security and screening for the PFAS equipment. This application does not propose landscaping or vegetative screening, as there will be no change to the existing use.
- 7. Elevated walkways shall be utilized, as appropriate, to cross sensitive areas such as wetlands.
 - Not applicable; no elevated walkways are proposed.

- 8. Fencing, walls, hedges, and similar features shall be designed in a manner that does not significantly interfere with wildlife movement.
 - An 8-foot high-security palisade fence will be installed around the facility's perimeter, but it will not enclose any natural areas.
- 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.
 - Proposed lighting will be limited to the street lighting required by the City Code and lighting typical of the existing PFAS treatment facility and associated infrastructure. Lights will be directed away from the shoreline and shielded to prevent light pollution.
- 10. Utilities shall be located within roadway and driveway corridors and rights-of-way wherever feasible.
 - Utilities will be constructed on-site as necessary for the construction of the PFAS treatment system. A sanitary sewer connection will be made to the existing sanitary sewer manhole in SE Cramer Lane for wastewater disposal, and a connection will be made to the existing sanitary sewer line on the east side of the site for system flushing.
- 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.
 - Not applicable; aquaculture is not proposed.

2.6.2 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.
 - The Project will provide appropriate erosion control. BMPs will be installed prior to site grading, which will only occur during the dry season.
- 2. Clearing and grading shall not result in substantial changes to surface water drainage patterns off the project site and onto adjacent properties.
 - Currently, surface water drainage flows to an existing stormwater collection system on-site. Drainage patterns will continue to flow into the existing stormwater collection system following the completion of the proposed development. Additionally, to minimize Impacts within the shoreline, the Well 4 building will be removed, and within the fenced facility and infrastructure, the newly created pervious surface that does not overlap with the new impact footprint will be covered by permeable river rock to enhance water infiltration and reduce the environmental impact of impervious surfaces.

- 3. Developments shall include provisions to control erosion during construction and to ensure preservation of native vegetation for bank stability.
 - The Applicant will submit an Erosion Control Plan for approval by the City and install approved erosion control BMPs before beginning site grading. The BMPs will remain in place until site construction is complete.
- 4. Grading and grubbed areas shall be planted with a cover crop of native grasses until construction activities are completed.
 - All vegetation and ground disturbance that will not be replaced with impervious surfaces will be planted with a native grass seed mix until the construction activities are completed. There are currently no native grasses or other native vegetation within the impacted portion of the shoreline jurisdiction.
- 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.
 - No grading will occur in a location where shoreline stabilization will be necessary.
- 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.
 - No speculative fills are proposed. This standard does not apply.
- 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.
 - Noted.
- 8. Fills shall be designed and placed to allow surface water penetration into groundwater supplies where such conditions existed prior to filling.
 - Noted.
- 9. Fills must protect shoreline ecological functions, including channel migration processes.
 - Within the fenced facility and infrastructure, the newly created pervious surface that does not overlap with the new impact footprint will be covered by permeable river rock to enhance water infiltration and reduce the environmental impact of impervious surfaces. The proposed project is not located within a channel migration zone.
- 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 is not proposed.

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.

Fills for beach nourishment or enhancement are not proposed.

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

No excavation will occur below the OHWM.

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.

Within the fenced facility and infrastructure, the newly created pervious surface that does not overlap with the new impact footprint will be covered by permeable river rock to enhance water infiltration and reduce the environmental impact of impervious surfaces.

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.

This site was not previously converted from foresty land.

2.6.3 5.7.3 Building Design

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

The Project will conform to the natural contours and minimize disturbance to soil and native vegetation to the greatest extent practicable. Additionally, the Well 4 building will be removed, and the newly created pervious surface that does not overlap with the impact footprint will be covered by permeable river rocks to enhance water infiltration and reduce the environmental impact of impervious surfaces.

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.

The Project proposes to update the current water treatment facility to include a new PFAS treatment system and supporting infrastructure to address the Environmental Protection Agency's (EPA) PFAS requirements.

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

No buildings are proposed on or adjacent to the water. Large native trees screen the proposed development from the water, meeting this standard.

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.

While the proposed ion exchange tanks will be approximately 25 feet tall, no two-story buildings exist or are proposed on-site, so this standard does not apply.

2.7 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.

No native vegetation will be removed by the project.

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.

No native vegetation will be removed by the project.

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 reestablished in the disturbed area.

Not applicable

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

The project will not remove native shrubs or trees, only non-native lawn grasses. The newly created pervious surface that does not overlap with the new impact footprint will be covered by permeable river rock to enhance water infiltration and reduce the environmental impact of impervious surfaces.

- 5. Pruning of trees is allowed in compliance with the National Arborist Association pruning standards. Pruning must meet the following criteria:
 - a. Removal of no more than twenty (20) percent of the limbs of any single tree may be removed; and
 - b. No more than twenty (20) percent of canopy in a single stand of trees may be removed in a given five (5) year period without a shoreline permit.

No tree topping or pruning is proposed for this project.

6. Topping trees is prohibited.

No tree topping or pruning is proposed for this project.

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.

No hazard trees have been identified on-site.

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.

Natural features within shoreline jurisdiction or critical areas will not be removed.

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.

No features within the Lacamas Creek Shoreline will be removed.

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.

No aquatic weed control is proposed. This standard does not apply.

2.8 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.

No new buildings or additions exceeding 35 feet in height are proposed. Visual access will be maintained at the terminus of the easement for SE Cramer Lane, and access will be enhanced by the construction of a sidewalk along the west side of SE Cramer Lane to provide ADA access to an existing gravel pathway. Construction of the proposed PFAS equipment will not affect the shoreline view of residents in the general vicinity. There will be no changes to the existing public access.

2.9 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.
 - Surface and groundwater quality and quantity will be maintained by meeting the requirements of the City of Camas Stormwater Ordinance. Required stormwater plans and reports have been submitted meeting the requirements of CMC Chapter 14.02 Stormwater Control. Erosion and sedimentation control best management practices have been proposed, meeting the requirements of CMC Chapter 14.06 Erosion and Sediment Control. Please refer to the plans submitted with this application for more information regarding compliance with this section.
- 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
 - No potentially harmful materials will enter any water body as a result of this project.
- 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.
 - This application does not propose the application of herbicides, pesticides, fungicides, or fertilizers within 25 feet of water.
- 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.
 - No structure or feature is proposed in the Aquatic shoreline.
- 7. Conveyance of any substance not composed entirely of surface and stormwater directly to water resources shall be by CMC Chapter 14.02.
 - No substance that is not composed entirely of surface and stormwater will be directly conveyed to water resources.
- 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.
 - No septic systems are proposed. This standard does not apply.

2.10 6.3.15 Utilities Uses

These provisions apply to services and facilities that produce, convey, store, or process power, gas, wastewater, communications, and similar services and functions. On-site utility features serving a primary use, such as a water, sewer or gas line to a residence or other approved use are "accessory utilities" and shall be considered a part of the primary use.

As the existing use on site is as a municipal water well, the proposed PFAS treatment system is designed to remove PFAS and other substances from public drinking water.

- 1. Whenever feasible, all utility facilities shall be located outside shoreline jurisdiction. Where distribution and transmission lines (except electrical transmission lines) must be located in the shoreline jurisdiction, they shall be located underground or within the footprint of an existing, built roadway.
 - The existing Well 13 site is currently located partially within the shoreline area. The proposed PFAS treatment system will be installed south of the existing Well 13 well and chemical building in the shoreline area. In addition, a new well and chemical building are proposed north of the proposed electrical room expansion. All distribution piping associated with the PFAS treatment system will be installed underground except where they daylight to connect to PFAS treatment system components.
- 2. Where overhead electrical transmission lines must parallel the shoreline, they shall be no closer than one hundred (100) feet from OHWM unless topography or safety factors would make it unfeasible, then a shoreline conditional use permit shall be required.
 - No proposed overhead transmission lines paralleling the shoreline are proposed. This standard does not apply.
- 3. Utilities shall be designed, located and installed in such a way as to preserve the natural landscape, minimize impacts to scenic views, and minimize conflicts with present and planned land and shoreline uses.
 - The Project will conform to the natural contours and minimize disturbance to soil and native vegetation to the greatest extent practicable. Additionally, the Well 4 building will be removed, and the newly created pervious surface that does not overlap with the new impact footprint will be covered by permeable river rocks to enhance water infiltration and reduce the environmental impact of impervious surfaces. There will be no changes to the existing public access, all structures within the development will be less than two stories (PFAS tanks will be 25' tall), and all other utilities will be piped underground. An eight-foot high-security palisade fence around the facility's perimeter will be installed, which will partially screen the PFAS equipment but will not enclose any natural areas.

4. Transmission, distribution, and conveyance facilities shall be located in existing rights of way and corridors or shall cross shoreline jurisdictional areas by the shortest, most direct route feasible, unless such route would cause significant environmental damage.

Not applicable.

5. Utility production and processing facilities, such as power plants and wastewater treatment facilities, or parts of those facilities that are nonwater-oriented shall not be allowed in the shoreline jurisdiction unless it can be demonstrated that no other feasible option is available and will be subject to a shoreline conditional use permit.

The Applicant proposes constructing a new PFAS treatment facility and associated infrastructure on the existing Well 13 (water treatment) site to address the Environmental Protection Agency's PFAS requirements. Because the existing well is currently operative and native vegetation has been previously removed from the site, the existing location is the most feasible location for accessing groundwater (near Lacamas Creek) without creating additional shoreline impacts. The Project will be subject to the conditions of a Shoreline Conditional Use Permit from the City.

6. Stormwater control facilities, limited to detention, retention, treatment ponds, media filtration facilities, and lagoons or infiltration basins, within the shoreline jurisdiction shall only be permitted when the following provisions are met: a. The stormwater facility is designed to mimic and resemble natural wetlands and meets the standards of CMC 14.02 Stormwater and the discharge water meets state water quality standards; b. Low impact development approaches have been considered and implemented to the maximum extent feasible.

A stormwater control facility is not proposed. Currently, surface water drainage flows to an existing stormwater collection system on-site. Drainage patterns will continue to flow into the existing stormwater collection system following the completion of the proposed development.

7. New and modifications to existing outfalls shall be designed and constructed to avoid impacts to existing native aquatic vegetation attached to or rooted in substrate. Diffusers or discharge points must be located offshore at a distance beyond the nearshore area to avoid impacts to those habitats.

There are no new or modified outfalls associated with the project.

8. Water reclamation discharge facilities (e.g. injection wells) are prohibited in the shoreline jurisdiction, unless the discharge water meets State Department of Ecology Class A reclaimed water standards. Proponents for discharge of Class A reclaimed water in the shoreline jurisdiction shall demonstrate habitat benefits of such discharge.

Water reclamation is not proposed.

9. Where allowed under this program, construction of underwater utilities or those within the wetland perimeter shall be scheduled to avoid major fish migratory runs or use construction methods that do not cause disturbance to the habitat or migration.

There is no proposed construction of underwater utilities.

10. All underwater pipelines transporting liquids intrinsically harmful to aquatic life or potentially detrimental to water quality shall provide automatic shut off valves.

No underwater pipelines are proposed.

11. Upon completion of utility installation/maintenance projects on shorelines, banks shall, at a minimum, be restored to pre-project configuration, replanted and provided with maintenance care until the newly planted vegetation is fully established. Plantings at installation shall be at least 2" minimum caliper at breast height if trees, five-gallon size if shrubs, and ground cover shall be planted from flats at 12" spacing, unless other mitigation planting is recommended by a qualified biologist and approved by the Administrator.

Impacts to the bank are not proposed. All project work will occur above the top of bank of Lacamas Creek.

3. References

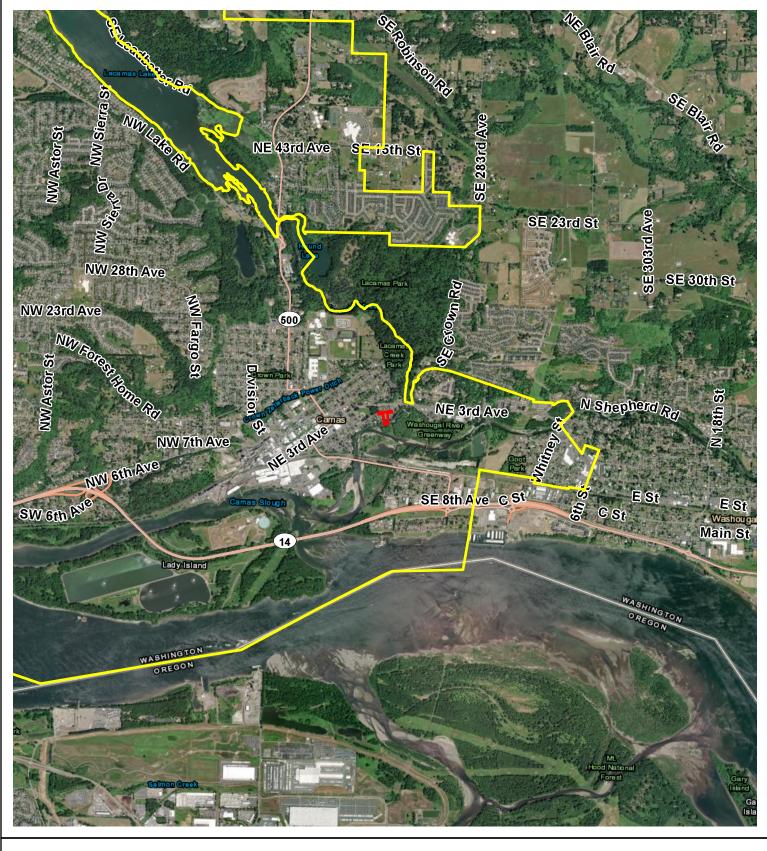
City of Camas Washington. 2024. Camas, Washington Municipal Code, Title 16 – Environment. https://library.municode.com/wa/camas/codes/code_of_ordinances?nodeId=TIT16EN.

City of Camas. 2021. Camas Shoreline Master Program. chromeextension://efaidnbmnnnibpcajpcglclefindmkaj/https://www.cityofcamas.us/sites/default/files/filea ttachments/community_development/page/6071/smp_2021_final.pdf.

Flounlacker, Meghan, Joy Peplinski, and Rob Charles. August 5, 2024. Meeting with Kristen Currens, Environmental Manager, and Sara Hastings, Environmental Scientist; MacKay Sposito, Meghan Tait, Wetland/Shoreland Specialist, Washington Department of Ecology; Joy Peplinski, Habitat Biologist, Washington Department of Fish and Wildlife, and Rob Charles, Utilities Manager, City of Camas.

MacKay Sposito. 2025. Shoreline Critical Areas Report. January 22, 2025.

Appendix A – Figures



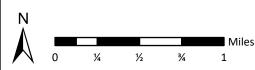
Data Sources: Basemap by ESRI. City Limits by Clark County. All other data created by MacKay Sposito. 1/8/2025 Camas City Limits
PSA Boundary (1.40 acres)

PSA Location: 45.6006846, -122.4303372

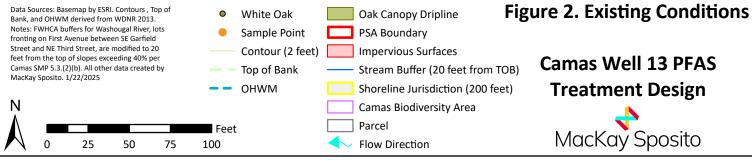
Figure 1. Vicinity Map

Camas Well 13 PFAS Treatment Design

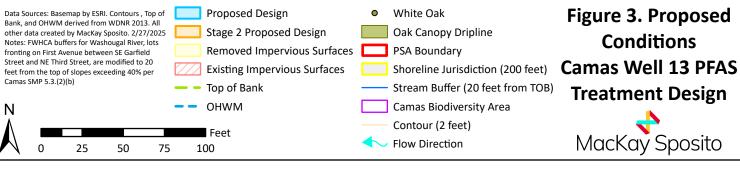












Appendix B – Site Plan

