



SHORELINE NARRATIVE

Camas Well 13 PFAS Treatment Design

February 28, 2025

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MSi Project No. 18581


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Shoreline Narrative
Wetland Scientist Signature

Prepared by:

A handwritten signature in black ink, reading "Kristen H. Currens", is written over a horizontal line.

Signature

Kristen Currens

Printed Name

May 22, 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.

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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.

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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.

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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 Impervious	Proposed Increase in Pervious	Proposed Increase in Impervious	Net Increase Impervious	Proposed Total 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.

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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.*

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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.

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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;

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- 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 1st 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.

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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.

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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.*

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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 forestry 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.

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

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.*

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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 re-established 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.

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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.*

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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.

Shoreline Narrative
Camas Well 13 PFAS Treatment Design

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.

Shoreline Narrative

Camas Well 13 PFAS Treatment Design

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.

Shoreline Narrative
Camas Well 13 PFAS Treatment Design

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. Shoreline Conditional Use

Utilities are a conditional use within the Medium Intensity shoreline designation. Based on Appendix B of the SMP, "Conditional use approval may be granted only if the applicant can demonstrate all of the following":

1. *The proposed use is consistent with the general intent of the Program, and the policies of the Act (RCW 90.58.020).*

The proposed project improvements in the shoreline jurisdiction are designed to minimize impacts by entirely avoiding the riparian buffer and positioning the infrastructure as far north as possible. In addition, the project has been carefully sited to avoid all trees and shrubs within the shoreline jurisdiction. The project is in conformance with the general intent of the SMP.

2. *The proposed use will not interfere with normal public use of public shorelines;*

No interference with the public use of the shoreline will occur. A 5-foot-wide ADA-accessible sidewalk will be constructed to upgrade the existing gravel path public access at the site.

3. *The proposed use of the site and design of the development will be compatible with the surrounding authorized uses, the Program, and the comprehensive plan;*

The proposed project has been designed on the most landward portion of the shoreline jurisdiction, avoids the removal of trees and shrubs within the shoreline jurisdiction, and is compatible with the existing surrounding commercial and residential uses. The proposed development will enhance the public enjoyment of the shoreline by upgrading the existing public access to a 5-foot-wide ADA-accessible sidewalk.

4. *The proposed use will cause no significant adverse effects on the shoreline environment or other uses; and*

Shoreline Narrative
Camas Well 13 PFAS Treatment Design

No adverse effects are anticipated from the proposed development. The proposed project improvements in the shoreline jurisdiction are designed to minimize ecological impact by excluding impacts from the riparian buffer and positioning the infrastructure as far north on the site as possible. In addition, the project has been carefully sited to avoid all trees and shrubs within the shoreline jurisdiction.

5. *That the public interest would suffer no substantial detrimental effect;*

The public interest would suffer no substantial detrimental effect as the existing public access at the site will be upgraded through the construction of a 5-foot wide ADA-accessible sidewalk.

Shoreline Narrative
Camas Well 13 PFAS Treatment Design

4. 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.

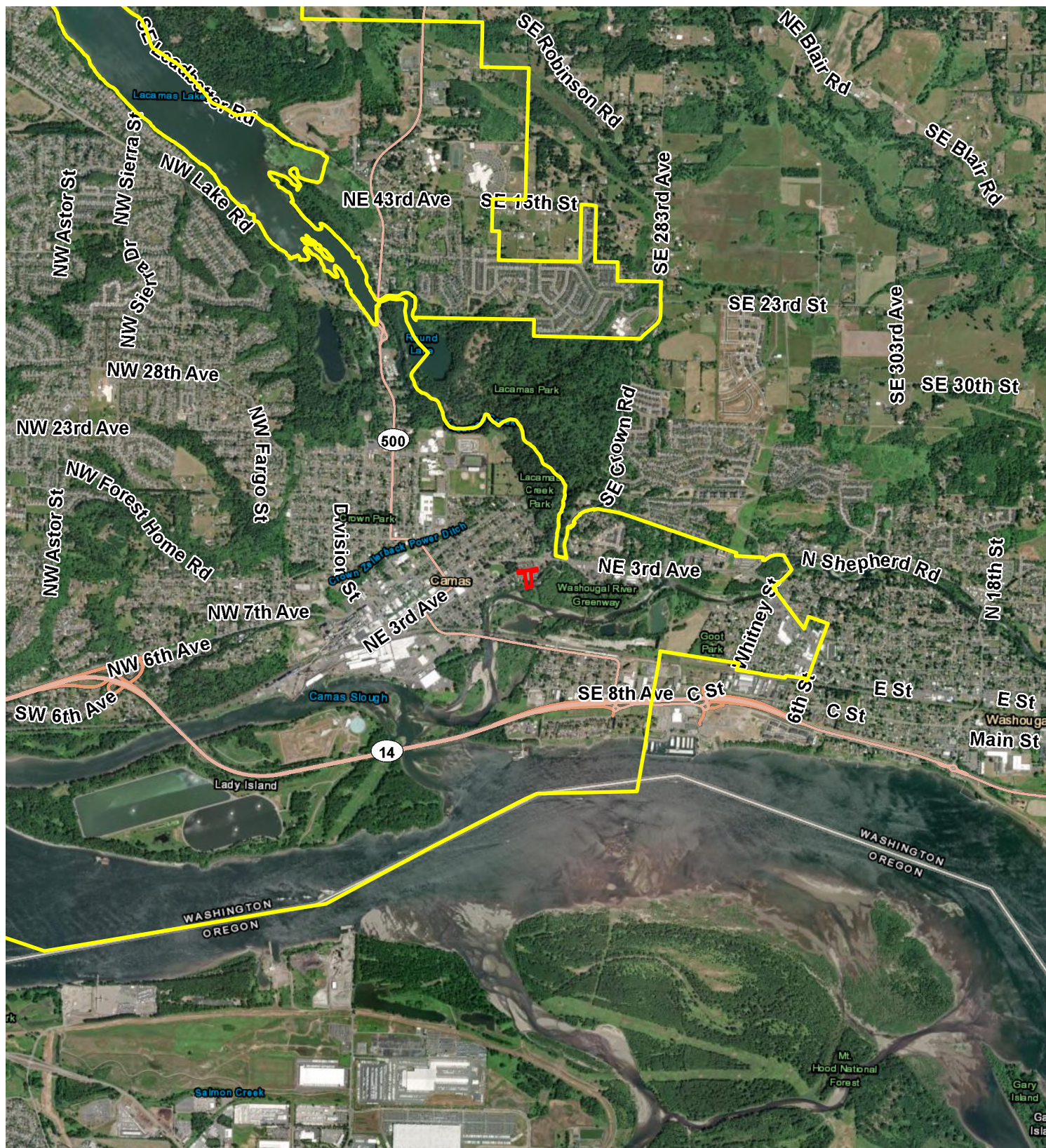
City of Camas. 2021. Camas Shoreline Master Program. chrome-

extension://efaidnbmnnnibpcajpcgltclfindmkaj/https://www.cityofcamas.us/sites/default/files/fileattachments/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

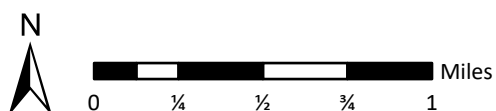
▬ Camas City Limits
▬ PSA Boundary (1.40 acres)

PSA Location: 45.6006846, -122.4303372

Figure 1. Vicinity Map

**Camas Well 13 PFAS
Treatment Design**


 MacKay Sposito





Data Sources: Basemap by ESRI. Contours, Top of Bank, and OHWM derived from WDNR 2013.
 Notes: FWHCA buffers for Washougal River, lots fronting on First Avenue between SE Garfield Street and NE Third Street, are modified to 20 feet from the top of slopes exceeding 40% per Camas SMP 5.3.(2)(b). All other data created by MacKay Sposito. 1/22/2025

- White Oak
- Sample Point
- Contour (2 feet)
- Top of Bank
- OHWM
- Oak Canopy Dripline
- PSA Boundary
- Impervious Surfaces
- Stream Buffer (20 feet from TOB)
- Shoreline Jurisdiction (200 feet)
- Camas Biodiversity Area
- Parcel
- Flow Direction

Figure 2. Existing Conditions

Camas Well 13 PFAS Treatment Design


 MacKay Sposito



Data Sources: Basemap by ESRI. Contours, Top of Bank, and OHWL derived from WDNR 2013. All other data created by MacKay Spósito. 2/27/2025
 Notes: FWHCA buffers for Washougal River, lots fronting on First Avenue between SE Garfield Street and NE Third Street, are modified to 20 feet from the top of slopes exceeding 40% per Camas SMP 5.3.(2)(b)

- Proposed Design
- Stage 2 Proposed Design
- Removed Impervious Surfaces
- Existing Impervious Surfaces
- Top of Bank
- OHWL

- White Oak
- Oak Canopy Dripline
- PSA Boundary
- Shoreline Jurisdiction (200 feet)
- Stream Buffer (20 feet from TOB)
- Camas Biodiversity Area
- Contour (2 feet)
- Flow Direction

**Figure 3. Proposed Conditions
 Camas Well 13 PFAS
 Treatment Design**

Appendix B – Site Plan



VICINITY MAP SEC. 11 & 12 T1N R3E W.M. NTS

SITE PLAN NOTES

EXISTING SITE DATA

PRESENT USE: CAMAS WELL #13
ADDRESS: 1250 E. 2ST AVENUE, CAMAS, WA 98607
EXISTING ZONING: MULTIFAMILY RESIDENTIAL-18 (R-18)
GROSS SITE AREA: PARCEL 90928000 IS 0.38 ACRES (16,553 SF) ACCORDING TO CLARK COUNTY GIS, 0.28 ACRES (12,269 SF) ACCORDING TO SURVEY BY MACKAY SPOSITO, INC.

PARCEL 91031000 IS 0.12 ACRES (5,227 SF) ACCORDING TO CLARK COUNTY GIS, 0.16 ACRES (6,951 SF) ACCORDING TO SURVEY BY MACKAY SPOSITO, INC.

PARCEL 91034000 IS 0.06 ACRES (2,614 SF) ACCORDING TO CLARK COUNTY GIS, 0.06 ACRES (2,755 SF) ACCORDING TO SURVEY BY MACKAY SPOSITO, INC.

THE ENTIRE SITE IS 0.50 ACRES (21,975 SF).

SURROUNDING USES WITHIN 100' OF THE SITE:

NORTH: (ACROSS E. 1ST AVENUE) CHURCH PARKING LOT ON COMMUNITY COMMERCIAL ZONED PROPERTY.
SOUTH: WASHOUGAL RIVER GREENWAY ON MULTIFAMILY RESIDENTIAL-18 PROPERTY.
EAST: SINGLE-FAMILY ATTACHED (TOWNHOME) RESIDENTIAL USES ON MULTIFAMILY RESIDENTIAL-18 PROPERTY.
WEST: SINGLE-FAMILY DETACHED RESIDENTIAL USES ON MULTIFAMILY RESIDENTIAL-18 ZONED PROPERTY.

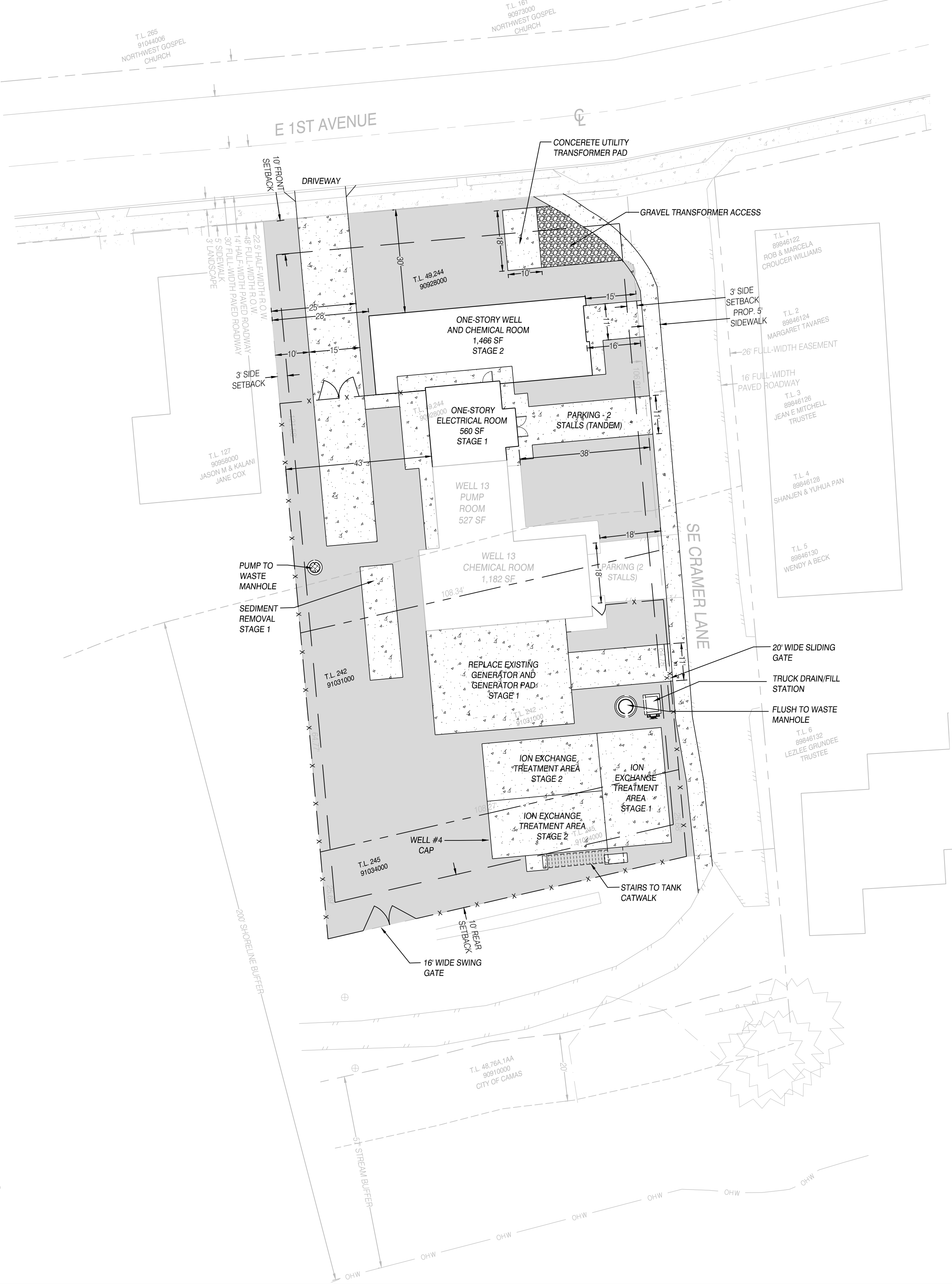
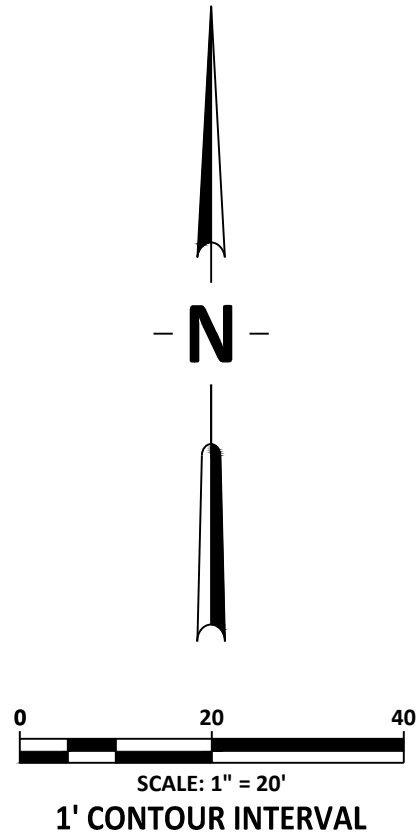
PROPOSED SITE DATA:

PROPOSED USE:	PFAS TREATMENT FOR WELL #13 AND NEW WELL
WETLAND, STREAM, STEEP BANK BUFFER AREAS/PROTECTED AREAS, AND PLANNED ENHANCEMENT AREAS:	STREAM AND SHORELINE BUFFERS AS SHOWN
PROPOSED PRIVATE ROADS:	NONE PROPOSED
PROPOSED EASEMENTS:	TO BE SHOWN ON FUTURE PLANS AS REQUIRED
PROPOSED ON-SITE ROAD RIGHTS-OF-WAY:	NONE PROPOSED
PROPOSED PEDESTRIAN AND BICYCLE FACILITIES:	NONE PROPOSED
PROPOSED VEHICLE PARKING:	AS SHOWN/EXISTING TO REMAIN
PROPOSED BICYCLE PARKING:	NONE PROPOSED
PROPOSED LOADING ZONES:	NONE PROPOSED
PROPOSED SEPTIC SYSTEMS:	NONE PROPOSED
PROPOSED OPEN SPACE/PARK/RECREATIONAL FEATURES:	NONE PROPOSED
PROPOSED TRANSIT FACILITIES:	NONE PROPOSED
ROAD SEGMENTS IN EXCESS OF 15% ON-SITE OR WITHIN 500' OF THE SITE:	NONE KNOWN
PROPOSED SIGNS:	NONE PROPOSED AT THIS TIME
PROPOSED LIGHTING:	TO BE SHOWN ON LIGHTING PLAN
PROPOSED LOTS, TRACTS, ETC:	NONE PROPOSED
EXISTING BUILDINGS TO REMAIN:	EXISTING WELL BUILDING AS SHOWN
PROPOSED LANDSCAPING (LANDSCAPE PLAN):	TO BE SHOWN ON THE LANDSCAPE PLAN
PROPOSED BUILDINGS:	AS SHOWN
ABOVE-GROUND UTILITIES:	REFER TO CIVIL ENGINEERING PLANS
PROPOSED FENCES:	AS SHOWN

IF ANY CULTURAL OR HISTORICAL RESOURCES ARE DISCOVERED IN THE COURSE OF UNDERTAKING THE DEVELOPMENT ACTIVITY, THE DEPARTMENT OF ARCHAEOLOGY AND HISTORIC PRESERVATION (DAHP) IN OLYMPIA AND CITY OF CAMAS DEVELOPMENT REVIEW SERVICES MUST BE NOTIFIED. FAILURE TO COMPLY WITH THESE STATE REQUIREMENTS MAY CONSTITUTE A CLASS C FELONY SUBJECT TO IMPRISONMENT AND/OR FINES.

SITE PLAN CALCULATIONS	
TOTAL SITE AREA	21,975 SF
BUILDING AREA (INCLUDES ALL STAGES)	3,735 SF (17.0%)
LANDSCAPE AREA	10,550 SF (48.0%)
PAVED AREA (INCLUDES ALL STAGES)	7,690 SF (35.0%)

PARKING CALCULATIONS	
PARKING REQUIRED	
3,735 SF PUBLIC OR PRIVATE UTILITY BUILDING	
1 STALL 1,000 SF GROSS FLOOR AREA	
3,735 / 1,000 = 4 STALLS	
PARKING PROVIDED	
4 STANDARD STALLS (2 EXISTING AND 2 PROPOSED)	

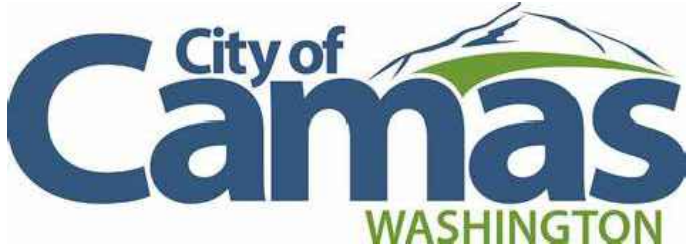


LEGEND

[Symbol]	EX. CATCH BASIN SQUARE
[Symbol]	EX. STORM CULVERT
[Symbol]	EX. STORM CLEANOUT
[Symbol]	EX. SANITARY MANHOLE
[Symbol]	EX. WATER VALVE
[Symbol]	EX. WATER METER
[Symbol]	EX. BLOWOFF
[Symbol]	EX. FIRE HYDRANT
[Symbol]	EX. HOSE BIB
[Symbol]	EX. GAS VALVE
[Symbol]	EX. UTILITY POLE
[Symbol]	EX. UTILITY POLE WITH DOWN WIRE
[Symbol]	EX. GUY ANCHOR
[Symbol]	EX. ELECTRIC BOX
[Symbol]	EX. ELECTRIC METER
[Symbol]	EX. ELECTRIC TRANSFORMER
[Symbol]	EX. FENCE POST (NO WIRE)
[Symbol]	EX. SIGN
[Symbol]	EX. BOLLARD
[Symbol]	EX. TREE-CONIFER
[Symbol]	EX. TREE-DECIDUOUS
[Symbol]	EX. TREE-CLUMP
[Symbol]	EX. CONCRETE SURFACE
[Symbol]	EX. GRAVEL SURFACE
[Symbol]	PROP. CONCRETE SURFACE
[Symbol]	PROP. GRAVEL SURFACE
[Symbol]	PROP. LANDSCAPE AREA
[Symbol]	EX. BUILDING-FOOTPRINT
[Symbol]	NEW BUILDING FOOTPRINT
[Symbol]	FUTURE BUILDING FOOTPRINT/CONCRETE PAD
[Symbol]	PROP. FENCE
[Symbol]	EX. OFF-SITE BUILDING
[Symbol]	BOUNDARY
[Symbol]	ADJACENT TAX LOTS
[Symbol]	EX. EASEMENT AS NOTED
[Symbol]	CONTOUR
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[Symbol]	EX. FENCE-WIRE
[Symbol]	EX. FENCE-WOOD
[Symbol]	EX. OREGON WHITE OAK DRIPLINE
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[Symbol]	EX. 150' STREAM BUFFER
[Symbol]	EX. 200' SHORELINE BUFFER
[Symbol]	EX. LANDSCAPE
[Symbol]	EX. ASPHALT
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[Symbol]	EX. GRAVEL
[Symbol]	EX. GUARDRAIL
[Symbol]	EX. SANITARY SEWER
[Symbol]	EX. STORM SEWER
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[Symbol]	EX. GAS
[Symbol]	EX. COMMUNICATIONS (MISC...)
[Symbol]	EX. COMMUNICATIONS (TV)

INTERMEDIATE DESIGN SUBMITTAL NOT FOR CONSTRUCTION			
REV	DATE	BY	DESCRIPTION
1			
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DESIGNED	CAROLLO
DRAWN	MRO
CHECKED	MRO
DATE	FEBRUARY 2025



CITY OF CAMAS

CAMAS PFAS EVALUATION & WELL 13 TREATMENT

SITE PLAN

VERIFY SCALES	JOB NO. 203101
BAR IS ONE INCH ON ORIGINAL DRAWING	DRAWING NO. SP1.0
IF NOT ONE INCH ON THIS SHEET, ADJUST SCALES ACCORDINGLY	SHEET NO. OF 15