



13. Shoreline Permit

A Shoreline Substantial Development Permit Narrative for Village at North Shore

Date: July 2025

Submitted to: City of Camas
Community Development Department
616 NE 4th Avenue
Camas, WA 98607

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Applicant's Consultant:	AKS Engineering & Forestry, LLC 9600 NE 126 th Avenue, Suite 2520 Vancouver, WA 98682 Contact(s): Michael Andreotti Email: andreottim@aks-eng.com Phone: (360)-882-0419
Site Location:	313 SE Leadbetter Road and 305 SE 252 nd Avenue Camas, WA 98607
Clark County Parcels	177885-000 and 178175-000
Site Size:	36.04 acres (±1,569,697 square feet)
Land Use Districts:	North Shore Mixed Use (MX-NS), North Shore Higher Density Residential (HD-NS), North Shore Lower Density Residential (LD-NS), and North Shore Commercial (C-NS)



I. Executive Summary

Through this application, HSR Dev — Mills, LLC (Applicant), requests approval from the City of Camas (City) to subdivide the subject site (described below) into a 108-lot subdivision (Villages at North Shore). The planned subdivision will include 102 single-family residential lots for the future construction of attached and detached single-family homes. Six lots within the subdivision are planned for the construction of mixed use buildings and apartment buildings. The mixed used buildings will have commercial on the ground floor with multifamily units on the floors above. The project will gain access from NE 252nd Avenue. An internal street network is planned to be constructed to serve the subdivision. The project will also provide future circulation opportunities to the west with the creation of N 54th Avenue, N 55th Avenue, N 56th Avenue, and N 57th Avenue. The right-of-way for North Shore Boulevard will also be dedicated with this project. N Mills Street, a planned local road, will be constructed with half-width improvements along the site's western boundary. The project will also provide sanitary sewer, water, and stormwater utility connections and a pedestrian path from the subject site to SE Leadbetter Road. While the subject site is outside of the shoreline, construction of the utilities and pedestrian pathway will occur within the Medium Intensity Shoreline Designation for Lacamas Lake.

The highlights of this project, which will be discussed further in this narrative, include the following:

- Subdivision with 108 lots
 - 61 single-family attached lots
 - 41 single-family detached lots
- Creation of six mixed-use lots containing 140 multifamily apartment units and ±30,250 of commercial space.
- Construction of an internal public street network to serve the site and provide future circulation to adjacent properties
- Construction of all necessary utilities to serve the site
- Off-site utility connections and pedestrian pathway, portion of which are in the shoreline

This written narrative includes findings of fact demonstrating that this application complies with all applicable approval criteria. These findings are supported by substantial evidence, including Preliminary Engineering Plans and other written documentation. This information, which is included in this application package, provides the basis for the City to approve the application.

II. Site Description/Setting

The subject site consists of two parcels and is ±36.04 acres in size. The site is addressed as 313 SE Leadbetter Road and 305 SE 252nd Avenue, Camas, WA 98607. The parcels are identified as 177885-000 of the Northeast Quarter of Section 34, Township 2 North, Range 3 East, Willamette Meridian and 178175-000 of Northwest Quarter of Section 35, Township 2 North, Range 3 East, Willamette Meridian. The site is split-zoned North Shore Mixed Use (MX-NS), North Shore Higher Density Residential (HD-NS), North Shore Lower Density Residential (LD-NS), and North Shore Commercial (C-NS). Both parcels have the Airport overlay Zone C overlay. The properties north and east of Parcel 178175-000 are zoned LD-NS. To the south are properties zoned North Shore Park/Open Space (POS-NS). The properties west and north of Parcel 178885-000 are zoned HD-NS. Parcels to the south are forested and used as a public park owned by the City. The properties to the west, north, and east are used as single-family residences, farmland, and undeveloped forest land.

The site fronts NE 252nd Avenue to the north and both parcels currently gain access from NE 252nd Avenue. NE 252nd Avenue is an existing rural local access county road.

The site is undulating and characterized by grades of 0 to 15 percent, with some steeper areas with slopes up to 25 percent. According to Clark County Geographic Information Systems (GIS), there are potential wetlands present on site. Oregon white oaks, streams, and priority habitat areas are mapped and present on-site. One Type-F stream has also been identified on-site. Wetlands, critical areas, and priority habitat areas are discussed later in this narrative. The site is heavily wooded, and the existing vegetation consists of evergreen and deciduous trees, shrubs, and field grass. The archaeological predictive for the site is moderate to high and there are mapping indicators for archaeological site buffers.

III. Applicable Review Criteria **CITY OF CAMAS SHORELINE MASTER PROGRAM**

CHAPTER 2 APPLICABILITY, SHORELINE PERMITS AND EXEMPTIONS

To be authorized, all uses and development activities in shorelines shall be carried out in a manner consistent with this Program and the policy of the Act as required by RCW 90.58.140(1), regardless of whether a shoreline permit, statement of exemption, shoreline variance, or shoreline conditional use is required.

2.1 Applicability

1. This Program shall apply to all of the shorelands and waters within the City of Camas that fall under the jurisdiction of RCW 90.58. Such shorelands shall include those lands extending two hundred (200) feet in all directions as measured on a horizontal plane from the ordinary high water mark (OHWM), floodways and contiguous floodplain areas landward two hundred feet from such floodways, associated wetlands, critical areas with associated buffer areas, river deltas associated with the streams, and lakes and tidal waters that are subject to the provisions of this program, as may be amended; the same to be designated as to location by Ecology, as defined by RCW 90.58.

Within the City of Camas the following waters are considered “shorelines” and are subject to the provisions of this Program: Lacamas Creek; Fallen Leaf Lake; Lacamas Lake; and Round Lake. The Columbia and Washougal Rivers are further identified as shorelines of statewide significance. A copy of the *Camas Shoreline Designations Map* and its UGA is shown in Appendix A.

The City is pre-designating shorelines within its adopted UGA. Until annexation occurs, all development in these areas will continue to be regulated by the Clark County Shoreline Master Program. The City’s SMP will apply concurrent with annexation and no additional procedures are required by Ecology at the time of annexation (WAC 173-26-150) unless a re-designation is occurring as specified per Table 4-1 of this Program.

Response: The subject site is located north of SE Leadbetter Road and north of the Legacy Lands area. The site is outside of the designated shoreline area, but a portion of a pedestrian path and utilities to service the site will be extended up from SE Leadbetter Road, which is within a shoreline of the state, and falls within the 200-foot Medium Intensity shoreline. Therefore, the Shoreline Master Program applies.

2.2 Shoreline Substantial Development Permit Required

Response: This application is for a 108-lot subdivision and site plan with a pedestrian pathway and utilities to be constructed within the Medium Intensity shoreline designation. A Shoreline Substantial Development Permit and Shoreline Conditional Use Permit are required.

CHAPTER 3 SHORELINE MASTER PROGRAM GOALS AND POLICIES

3.1 General Shoreline Goals

The general goals of this Program are to:

- Use the full potential of shorelines in accordance with the opportunities presented by their relationship to the surrounding area, their natural resource values, and their unique aesthetic qualities offered by water, topography, and views; and

Response: This application is for a 108-lot subdivision and site plan with a pedestrian pathway and utilities to be constructed within the Medium Intensity shoreline designation for Lacamas Lake. The site is ±917 feet north of Lacamas Lake, creating a physical separation of the site from the lake. However, the project will provide sanitary sewer, water, and stormwater utility connections and a pedestrian path from the subject site to SE Leadbetter Road. The shoreline does provide unique aesthetic qualities and views. All planned work within the shoreline jurisdiction area will be done within SE Leadbetter Road and within the existing gravel driveway serving Parcel 177898-000. A utility and public access easement will be recorded over the pedestrian pathway and utilities. The planned pedestrian path will be used for utility maintenance and pedestrian trail and connect with existing trails in the City of Camas's public parks at parcels 177905-000 and 177898-000. The utilities and pedestrian path will be constructed in a manner that will protect as many trees as practicable within the shoreline jurisdiction, as well as limit the visual impact of the construction to maintain the aesthetic qualities of the shoreline.

- Develop a physical environment that is both ordered and diversified and which integrates water and shoreline uses while achieving a net gain of ecological function.

Response: All planned work within the shoreline jurisdiction area will be done within SE Leadbetter Road and within the existing gravel driveway serving Parcel 177898-000. A utility and public access easement will be recorded over the pedestrian pathway and utilities. The planned pedestrian path will be used for utility maintenance and pedestrian trail and connect with existing trails in the City of Camas's public parks at parcels 177905-000 and 177898-000. The utilities and pedestrian path will be constructed in a manner that will protect as many trees as practicable within the shoreline jurisdiction, as well as limit the visual impact of the construction to maintain the aesthetic qualities of the shoreline. The planned pedestrian path and utilities have been designed to create minimal disturbance to the shoreline's ecological functions.

3.2 Shorelines of Statewide Significance

Within the City of Camas, the Columbia River and the Washougal River are designated shorelines of statewide significance (SSWS). Shorelines of statewide significance are of value to the entire state. In accordance with RCW 90.58.020, SSWS will be managed as follows:

Response: The site is not within the shoreline jurisdiction for the Columbia River or Washougal River; therefore, this section does not apply.

3.3 Archaeological, Historic, and Cultural Resources

3.3.1 Goal

The goal for archaeological, historic, and cultural resources is to preserve and prevent the destruction of or damage to any site having historic, cultural, scientific, or educational value. Such sites include those identified by affected Indian tribes, the Department of Archaeology and Historic Preservation, Clark County Historic Preservation Commission, and other appropriate authorities.

Response: Two Archaeological Predetermination Reports have been performed by Applied Archaeological Research, Inc. (AAR). The first report was performed in July 2022 and looked at parcels 177885-000 and 177884-000. The second report was performed in November 2024 and looked primarily at parcels 178175-000 and 178180-000. Neither report identified historic artifacts within the site, and neither report identified historic buildings within the site which would meet the requirements for listing in the National Register of Historic Places (NRHP). For those reasons, AAR does not recommend further archaeological work within the project area. If additional archaeological materials are discovered during construction, appropriate measures to protect these resources will be taken.

3.4 Conservation

3.4.1 Goal

The goal of conservation is to protect shoreline resources, vegetation, important shoreline features, shoreline ecological functions and the processes that sustain them to the maximum extent practicable.

Response: As previously stated, the only work occurring for the project within the shoreline area is a pedestrian pathway and utility connections in SE Leadbetter Road. All planned work within the shoreline jurisdiction area will be done within SE Leadbetter Road and within the existing gravel driveway serving Parcel 177898-000. A utility and public access easement will be recorded over the pedestrian pathway and utilities. The planned pedestrian path will be used for utility maintenance and pedestrian trail and connect with existing trails in the City of Camas's public parks at parcels 177905-000 and 177898-000. The utilities and pedestrian path will be constructed in a manner that will protect as many trees as practicable within the shoreline jurisdiction, as well as limit the visual impact of the construction to maintain the aesthetic qualities of the shoreline. The planned pedestrian path and utilities have been designed to create minimal disturbance to the shoreline's ecological functions.

3.5 Economic Development

3.5.1 Goal

The goal for economic development is to create and maintain an economic environment that is balanced with the natural and human environment.

Response: The planned project will allow for the economic development of the site while providing tracts to protect critical areas and native mature vegetation on-site. The pedestrian pathway and utilities will provide necessary connection for the project to SE Leadbetter Road and the City's park and recreation system along the shoreline. The utilities and pedestrian path will be constructed in a manner that will protect as many trees as

practicable within the shoreline jurisdiction, as well as limit the visual impact of the construction to maintain the aesthetic qualities of the shoreline. The planned pedestrian path and utilities have been designed to create minimal disturbance to the shoreline's ecological functions.

3.6 Flood Prevention and Flood Damage Minimization

3.6.1 Goal

The goal for flood hazards is to promote public health, safety, and general welfare, and to minimize public and private losses due to flood conditions in specific areas.

Response: All planned construction will occur within SE Leadbetter Road or the existing driveway serving Parcel 177898-000. The existing elevations within the flood plain will not be changed.

3.7 Public Access and Recreation

3.7.1 Goal

The goal of public access and recreation is to increase the ability of the general public to enjoy the water's edge, travel on the waters of the state, and to view the water and the shoreline from adjacent locations.

Response: A pedestrian pathway within a utility and public access easement is planned with this project. The pedestrian path will connect the planned project with the existing trails and recreation opportunities adjacent to and within the shoreline area.

3.8 Restoration

3.8.1 Goal

The goal of restoration is to re-establish, rehabilitate and/or otherwise improve impaired shoreline ecological functions and/or processes through voluntary and incentive-based public and private programs and actions that are consistent with the SMP Restoration Plan and other approved restoration plans.

Response: Restoration of the shoreline is not planned with this project. This project will provide multiple large open space tracts within the site and outside of the shoreline area. A pedestrian pathway within a utility and public access easement will be constructed with this project, which will provide additional access to the shoreline and it's aesthetic value.

3.9 Shoreline Modification and Stabilization

3.9.1 Goal

The goal for shoreline modification and stabilization is to avoid or minimize the need for shoreline armoring along shorelines of the state, and when it is necessary, achieve it in a way that best protects ecosystem processes, shoreline functions, and downstream properties. Shoreline stabilization activities should also be reviewed in balance with the provisions of Section 3.6 - Flood Prevention and Flood Damage Minimization of this Program.

Response: Restoration, modification, or stailization of the shoreline is not planned with this project.

3.10 Shoreline Use and Development

3.10.1 Goal

The goal for shoreline use and development is to balance the preservation and development of shorelines in a manner that allows for mutually compatible uses.

Resulting land use patterns will be compatible with shoreline designations and sensitive to and compatible with ecological systems and other shoreline resources. To help with this balance, shoreline and water areas with unique attributes for specific long term uses such as commercial, residential, industrial, water, wildlife, fisheries, recreational and open space shall be identified and reserved.

Response: All planned work within the shoreline jurisdiction area will be done within SE Leadbetter Road and within the existing gravel driveway serving Parcel 177898-000. A utility and public access easement will be recorded over the pedestrian pathway and utilities. The planned pedestrian path will be used for utility maintenance and pedestrian trail and connect with existing trails in the City of Camas's public parks at parcels 177905-000 and 177898-000. The utilities and pedestrian path will be constructed in a manner that will protect as many trees as practicable within the shoreline jurisdiction, as well as limit the visual impact of the construction to maintain the aesthetic qualities of the shoreline. The planned access/utility tract will provide additional access to the shoreline's aesthetic value and increase the ability of the public to enjoy the lake and its amenities.

3.11 Transportation, Utilities, and Essential Public Facilities

3.11.1 Goal

The goal for transportation, utilities, and essential public facilities is to provide for these facilities in shoreline areas without adverse effects on existing shoreline use and development or shoreline ecological functions and/or processes.

Response: SE Leadbetter Road runs through the Lacamas Lake shoreline jurisdiction. There are existing utility services in SE Leadbetter Road and the planned subdivision will connect to those utility services. A pedestrian path connecting the planned subdivision to SE Leadbetter Road will also be constructed within the shoreline area. The planned subdivision is outside the shoreline jurisdiction area. Improvements to SE Leadbetter are not planned with this project, but SE Leadbetter will be repaired to full service levels where connections to the utilities are made.

3.12 Views and Aesthetics

3.12.1 Goal

The goal for views and aesthetics is to assure that the public's opportunity to enjoy the physical and aesthetic qualities of shorelines of the state, including views of the water, is protected to the greatest extent feasible.

Response: All planned work within the shoreline jurisdiction area will be done within SE Leadbetter Road and within the existing gravel driveway serving Parcel 177898-000. A utility and public access easement will be recorded over the pedestrian pathway and utilities. The planned pedestrian path will be used for utility maintenance and pedestrian trail and connect with existing trails in the City of Camas's public parks at parcels 177905-000 and 177898-000. The utilities and pedestrian path will be constructed in a manner that will protect as many trees as practicable within the shoreline jurisdiction, as well as limit the visual impact of the construction to maintain the aesthetic qualities of the shoreline. The planned access/utility tract will provide additional access to the shoreline's aesthetic value and increase the ability of the public to enjoy the lake and its amenities.

3.13 Water Quality and Quantity

3.13.1 Goal

The goal for water quality and quantity is to protect and enhance the quality and quantity of the region's water resources to ensure there is safe, clean water for the public's needs and enjoyment; and protect wildlife habitat.

Response: All planned improvements within the shoreline will not have pollution generation runoff. Stormwater runoff from the subdivision will be collect and treated on-site to ensure that no polluted runoff enters the water from the project. The utilities and pedestrian path have also been designed to protect as many existing trees as practicable and limit the impact to the habitat within the shoreline.

CHAPTER 4 SHORELINE DESIGNATIONS

4.3 Shoreline Designations

The City classification system consists of shoreline designations that are consistent with and implement the Act (RCW 90.58), the Shoreline Master Program Guidelines (WAC 173-26) and the City of Camas Comprehensive Plan. These designations have been assigned consistent with the corresponding criteria provided for each shoreline designation. In delineating shoreline designations, the City aims to ensure that existing shoreline ecological functions are protected with the proposed pattern and intensity of development. Such designations should be consistent with the policies for restoration of degraded shorelines. The five shoreline designations are:

- Aquatic;
- Natural;
- Urban Conservancy;
- Medium Intensity; and
- High Intensity

4.3.4 Medium Intensity Shoreline Designation

Response: According to the Camas Shoreline Designations Map dated August 24, 2012, the area where the proposed work will occur along SE Leadbetter Road is within the Medium Intensity shoreline designation.

4.3.4.1 Purpose

The purpose of the "Medium Intensity" shoreline designation is to accommodate primarily residential development and appurtenant structures, but to also allow other types of development that are consistent with this chapter. An additional purpose is to provide appropriate public access and recreational uses.

Response: This application is for a 108-lot subdivision and site plan. Utility services to the site will be served by connecting water, sanitary sewer, and stormwater utilities to utilities located in SE Leadbetter Road, which is in a shoreline of the state, and falls within the 200-foot Medium Intensity shoreline designation of Lacamas Lake. A pedestrian pathway, which will also be used to provide access to the utilities, will be constructed to connect the site to SE Leadbetter Road. The site is ±917 feet north of Lacamas Lake, creating a physical separation of the site from the lake. However, the utility connections and a portion of the

pedestrian path from the subject site to SE Leadbetter Road will be constructed within the shoreline area. The shoreline does provide unique aesthetic qualities and views. All planned work within the shoreline jurisdiction area will be done within SE Leadbetter Road and within the existing gravel driveway serving Parcel 177898-000. A utility and public access easement will be recorded over the pedestrian pathway and utilities. The planned pedestrian path will be used for utility maintenance and pedestrian trail and connect with existing trails in the City of Camas's public parks at parcels 177905-000 and 177898-000. The utilities and pedestrian path will be constructed in a manner that will protect as many trees as practicable within the shoreline jurisdiction, as well as limit the visual impact of the construction to maintain the aesthetic qualities of the shoreline.

CHAPTER 5 GENERAL SHORELINE USE AND DEVELOPMENT REGULATIONS

5.1 General Shoreline Use and Development Regulations

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

Response: The proposed work within the shoreline area include utility connections and construction of a pedestrian pathway. No water dependent uses are planned with this project.

2. Shoreline uses and developments shall not cause impacts that require remedial action or loss of shoreline functions on other properties.

Response: All planned work within the shoreline jurisdiction area will be done within SE Leadbetter Road and within the existing gravel driveway serving Parcel 177898-000. A utility and public access easement will be recorded over the pedestrian pathway and utilities. The planned pedestrian path will be used for utility maintenance and pedestrian trail and connect with existing trails in the City of Camas's public parks at parcels 177905-000 and 177898-000. The utilities and pedestrian path will be constructed in a manner that will protect as many trees as practicable within the shoreline jurisdiction, as well as limit the visual impact of the construction to maintain the aesthetic qualities of the shoreline.

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 to protecting public safety and existing primary structures.

Response: The shoreline is located on the south side of SE Leadbetter Road and all work will occur within the roadway of SE Leadbetter Road or on the north site of the road.. No shoreline stabilization will be required with this project.

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.

Response: No work will be done within the shoreline jurisdiction prior to approval of this shoreline substantial development permit and shoreline conditional use permit.

5. Single family residential development shall be allowed on all shorelines except the Aquatic and Natural shoreline designation, and shall be located, designed and used in accordance with applicable policies and regulations of this Program.

Response: While this project is for a 108-lot subdivision and site plan, only utility connection and a pedestrian path are planned within the shoreline designation. The planned project will meet the requirements of the City of Camas's Shoreline Master Program.

6. 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.

Response: This project will be reviewed and approved by the City following the Type III Subdivision and Site Plan review process to determine that the planned project will meet the requirements of CMC Titles 17 and 18.

7. On navigable waters or their beds, all uses and developments should be located and designed to: (a) minimize interference with surface navigation; (b) consider impacts to public views; and (c) allow for the safe, unobstructed passage of fish and wildlife, particularly species dependent on migration.

Response: No impacts to Lacamas Lake or the shoreline are planned with this project; therefore, this standard does not apply.

8. 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.

Response: No known hazardous materials are contained on-site. Any hazardous materials found on site during construction will be disposed of properly. Grading for this project will require blasting of bed, which will follow all local, state, or federal regulations to ensure that no hazardous material leaves the site and is disposed of appropriately.

9. In-water work shall be scheduled to protect biological productivity (including but not limited to fish runs, spawning, and benthic productivity). In-water work shall not occur in areas used for commercial fishing during a fishing season unless specifically addressed and mitigated for in the permit.

Response: No in-water work is planned with this project.

10. 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 particular 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.

Response: The subject site is entirely out of the shoreline jurisdiction, off-site work for utility connections and a pedestrian path is planned within the shoreline jurisdiction. A Critical Areas Report and Archaeological Report have been prepared for this site and no impact to the shoreline will occur with this project.

11. The effect of proposed in-stream structures on bank margin habitat, channel migration, and floodplain processes should be evaluated during permit review.

Response: No in-stream structures are planned with this project.

12. 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.

Response: No relief from development regulations are requested with this application.

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.

Response: The planned work within the shoreline area will occur within an existing driveway. As the area is previously disturbed, no archaeological work was done for this area. The project will have an inadvertent discovery plan in place during construction in the event that anything is found.

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:

Response: The planned work within the shoreline area will occur within an existing driveway. As the area is previously disturbed and constructed with impervious surface, no critical areas exist where the work will occur..

5.4 Flood Prevention and Flood Damage Minimization

Response: All planned construction will occur within SE Leadbetter Road or the existing driveway serving Parcel 177898-000. The existing elevations within the flood plain will not be changed.

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.

Response: No public funding is involved with the project, however, a pedestrian path is being construct within a utility and public access easement from the subject site to SE Leadbetter Road. This trail will provide public access to the shoreline.

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:

Response: The proposed land division is outside of the shoreline area; however, a pedestrian path is being construct within a utility and public access easement from the subject site to SE Leadbetter Road. This trail will provide public access to the shoreline.

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.

Response: The portion of the pedestrian trail within the shoreline area will match existing grade to the greatest extent practicable to limit the impact to the surrounding vegetation in the shoreline area.

4. Public access shall include provisions for protecting adjacent properties from trespass and other possible adverse impacts to neighboring properties.

Response: The planned pedestrian trail will be located within an easement through City of Camas park property and not located near directly adjacent to any privately owned parcels.

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

Response: Direct public access cannot be provided to the shoreline due to the site being separated from the shoreline by SE Leadbetter Road; therefore, signs will not be installed.

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

Response: The planned pedestrian pathway will be constructed concurrent with the subdivision construction.

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

Response: The planned pedestrian trail will terminate on the north side of SE Leadbetter Road where views of the shoreline and water will be available. Direct access to the water is available just west of the trail at the public boat launch.

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.

Response: A planned utility and public access easement will be recorded over the pedestrian trail and utilities where they cross City of Camas Park property.

9. Future actions by the applicant, successors in interest, or other parties shall not diminish the usefulness or value of the public access provided.

Response: The planned utility and public access easement will be recorded over the pedestrian trail and utilities where they cross City of Camas Park property.. The easement will protect the usefulness or value of the pedestrian trail.

10. Maintenance of the public access facility shall be the responsibility of the owner unless otherwise accepted by a public or non-profit agency through a formal agreement approved by the Shoreline Administrator and recorded with the County Auditor's Office.

Response: The planned pedestrian trail will be located within the City park land and will owned and maintained by the City.

5.6 Restoration

Response: The planned subdivision will not impact the existing shoreline; therefore, there will be no restoration required related to the project.

5.7 Site Planning and Development

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.

Response: The Applicant will submit an Erosion Control plan for approval by the City and install approved erosion control best management practices (BMPs) prior to beginning site grading. Grading near the shoreline jurisdiction will be kept as minimal as possible and generally be limited to grading for pedestrian trail and the utility extensions from SE Leadbetter Road.

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

Response: Impervious surfaces created by the project within the shoreline will be limited to the pedestrian trail, that will be constructed to allow for maintenance access to the utilities that will extend from SE Leadbetter road to the subject site. No widening of SE Leadbetter road will occur with the utility connections.

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

Response: No road improvements will occur within any shoreline jurisdiction. Utilities will connect to existing utilities in SE Leadbetter Road the pedestrian trail will be limited to the extended needed for maintenance access for the utilities.

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.

Response: The portion of the pedestrian trail within the shoreline area will match existing grade to the greatest extent practicable to limit the impact to the surrounding vegetation in the shoreline area.

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 principle use.

Response: No accessory structures, parking, or storage a planned in the shoreline area with this application.

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.

Response: The planned trail is within existing City park land and is not adjacent to dissimilar uses or scenic areas.

7. Elevated walkways shall be utilized, as appropriate, to cross sensitive areas such as wetlands.

Response: No elevated walkways are proposed with this application.

8. Fencing, walls, hedges, and similar features shall be designed in a manner that does not significantly interfere with wildlife movement.

Response: No fencing, walls, hedges, or other similar features are proposed in the shoreline area with this application.

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.

Response: No new lighting is planned within the shoreline area with this application.

10. Utilities shall be located within roadway and driveway corridors and rights-of-way wherever feasible.

Response: All planned utilities within the shoreline jurisdiction will be located within the roadway and the planned utility and public access tract under the pedestrian trail.

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.

Response: The subject site is not located adjacent to an aquaculture.

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.

Response: Grading in the shoreline area will be limited to the area needed for utility installation and construction of the pedestrian pathway. Appropriate erosion control BMPs will be provided with this project. BMPs will be in place during site grading.

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

Response: Grading work of the pedestrian path installation will not modify the drainage patterns off-site and onto adjacent properties.

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

Response: The Applicant will submit an Erosion Control plan for approval by the City and install approved erosion control BMPs prior to beginning site grading. Erosion control 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.

Response: All grading areas will be seeded with native grass seed mix.

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.

Response: 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.

Response: No fill is anticipated within the shoreline area.

7. Soil, gravel or other 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.

Response: No fill is anticipated within the shoreline area.

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

Response: No fill is anticipated within the shoreline area.

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

Response: No fill is anticipated within the shoreline area.

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.

Response: No fill is anticipated within the shoreline area.

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.

Response: No fill for beach nourishment or enhancement are proposed with this project.

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

Response: 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.

Response: All cleared areas will be replanted with native species and maintained to ensure vegetation is established within three years.

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.

Response: No land within the shoreline area is being converted to non-forestry use.

5.7.3 Building Design

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

Response: The planned pedestrian trail will generally follow existing grades to minimize disturbance to soils and impacts to vegetation. No other structures are proposed in the shoreline area.

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.

Response: No structures are proposed within the shoreline area with this application.

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

Response: No buildings are proposed to be on or adjacent to the water.

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.

Response: No structures are proposed within the shoreline area with this application.

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.
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.

Response: The planned utility and pedestrian trail construction in the shoreline area will generally be within existing paved and gravel areas, limiting the removal of vegetation within the shoreline area.

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.

Response: Vegetation removal within the shoreline area will be limited and any disturbed areas will be re-established promptly following construction.

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

Response: Native vegetation will be used for replanting and disturbed areas following construction of the utilities and public trail.

5. Pruning of trees is allowed in compliance with the National Arborist Association pruning standards. Pruning must meet the following criteria:
6. Topping trees is prohibited.

Response: No trees to be protected during construction are planned to be pruned within the shoreline jurisdiction and no trees will be topped.

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.

Response: AKS Engineering and Forestry has completed a Tree Report and Tree Plan as part of this application. Tree removal will be necessary within the shoreline area to complete construction of the utility lines and pedestrian trail. Removal will be limited to only those trees impacted by construction. Tree will be protected to the greatest extent practicable.

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.

Response: Any natural features within the shoreline jurisdiction that do not threaten public safety will be left in place.

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.

Response: Removal of features within the on-site streams or Lacamas Lake is not planned with this project.

- 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.

Response: No aquatic weed control is planned with application.

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.

Response: The planned project will construct a pedestrian trail from the subject site to SE Leadbetter road. This will increase visual access to the shoreline within the pedestrian trail corridor.

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.

Response: The planned project will collect and treat surface runoff on site. Treated stormwater will be released to on-site wetlands or directly to Lacamas Lake under a large water body exemption as allowed by CMC. Stormwater management has been designed to maintain the general predevelopment drainage pattern. All stormwater will be released at rates permitted by Camas Municipal Code (CMC). The stormwater system is designed per the

Stormwater Management Manual for Western Washington. Preliminary erosion control plans are included with this application. A more detailed and site-specific erosion control plan will be provided with final construction plans for sediment and pollution control.

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

Response: 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.

Response: Use of herbicides, pesticides, fungicides, or fertilizers within 25 feet of a water are not planned with this project.

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.

Response: No structure or feature are planned in the Aquatic shoreline.

- 7 Conveyance of any substance not composed entirely of surface and stormwater directly to water resources shall be in accordance with CMC Chapter 14.02.

Response: Only treated stormwater will be directly discharged to Lacamas Lake, as allowed by CMC.

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.

Response: No septic systems are planned with this application.

CHAPTER 6 SPECIFIC SHORELINE USE REGULATIONS

Table 6-1 Shoreline Use, Modification and Development Standards

Abbreviations: X = Prohibited P = Permitted C = Conditional Use					
	AQ	NT	US	MI	HI
Shoreline Designation	Aquatic	Natural	Urban Conservancy	Medium Intensity	High Intensity
Shoreline Uses					
Recreational Uses					
Water-related/enjoyment (trails, accessory buildings)	C	P ⁴	P	P	P
• Building Setback	0'	20' (Buildings 100' ²)	20' (Buildings 100' ²)	50' ²	5' ²
• Building Height	15'	15'	15'	45'	60'
Utility Uses					
Underground Utilities (perpendicular to shoreline)	C	X	C	C	C
• Right-of-Way Setback	0'	N/A	100'	50'	50'

6.3 Use-specific Development Regulations

Response: The planned construction within the shoreline area is construction of utilities perpendicular to the shore to connect to existing utilities in SE Leadbetter Road and construction of a pedestrian trail with access from the subject site to the shoreline area within the Medium Intensity shoreline jurisdiction. Per Table 6-1, the planned trail is a permitted use and the utilities are a conditional use.

6.3.11 Recreational Development

1. Water-oriented recreational uses and developments are preferred.

Response: The pedestrian trail will terminate on the north side of SE Leadbetter Road and provide visual access to the shoreline. The trail is not a water orient use, but does provide access to the shoreline.

2 Trails shall be designed and constructed in substantial compliance with the standards of the Camas Park, Recreation and Open Space Comprehensive Plan, Design & Development Guidelines (2007, Appendix A), with the constructed width varying by trail type and critical area protection.

Response: The pedestrian trail will be designed to allow for vehicular access for maintenance of the utilities that will be installed under the trail.

3. Recreation areas or facilities on the shoreline shall provide physical or visual public access in accordance with Section 5.5.

Response: The planned pedestrian trail will provide visual access to the shoreline.

4. Parking areas that are accessory to recreational uses shall be located upland a minimum of one hundred and fifty (150) feet away from the immediate shoreline, with pedestrian trails or walkways providing access to the water.

Response: No parking areas are proposed with this application.

5. All permanent, substantial, recreational structures and facilities shall be located outside officially mapped floodways. The Administrator may grant exceptions for non-intensive minor accessory uses (including but not limited to, picnic tables or playground equipment).

Response: No structures are proposed with this application.

6. Parks and trailheads shall be provided with restrooms with hand washing facilities in accordance with public health standards and without adversely altering the natural features attractive for recreational uses.

Response: The planned trail is not anticipated to be a trail head. No restrooms are proposed.

7. Recreational facilities shall make adequate provisions, such as densely vegetated buffer strips, screening, fences, and signs, to protect the value and enjoyment of adjacent or nearby private properties and natural areas from trespass, overflow and other possible adverse impacts.

Response: The pedestrian trail will run through City of Camas park land and be surround by City of Camas park land. The existing forested land will provide a buffer to nearby private properties.

8. Provisions shall be made for the protection of water areas from drainage and surface runoff in all recreational developments requiring the use of fertilizers and pesticides in areas adjacent to shorelines, such as in play fields and golf courses.

Response: The planned project will collect and treat surface runoff on site. Treated stormwater will be released to on-site wetlands or directly to Lacamas Lake under a large water body exemption as allowed by CMC. Stormwater management has been designed to maintain the general predevelopment drainage pattern. All stormwater will be released at rates permitted by Camas Municipal Code (CMC). The stormwater system is designed per the Stormwater Management Manual for Western Washington. Preliminary erosion control plans are included with this application. A more detailed and site-specific erosion control plan will be provided with final construction plans for sediment and pollution control. No use of fertilizers or pesticides are planned with this project.

9. Golf course structures (clubhouses and maintenance buildings) that are non-wateroriented shall be located no closer than one hundred (100) feet from the OHWM.
10. Tees, greens, fairways, golf cart routes, and other site development features shall be located no closer than two hundred (200) feet from the OHWM to the extent practicable. If golf cart routing is combined with public access trails, it may be located one hundred (100) feet from OHWM.
11. Golf course water hazards and stormwater drainage basins shall be managed for wildlife through appropriate plantings and measures to maintain or enhance water quality.

Response: No golf courses are planned with this application.

6.3.15 Utilities Uses

Response: The planned project will provide underground utilities that will generally be within the road rights-of-way and the planned utility and public access easement. Proposed utilities will connect to the existing utilities in SE Leadbetter Road and connect at the southwest

corner of the project. All utilities will be constructed outside of the shoreline jurisdiction with the exception of the connections in SE Leadbetter Road, and where the planned utility and public access easement crosses through the shoreline jurisdiction.

V. Conclusion

The required findings have been made and this written narrative and accompanying documentation demonstrate that the application is consistent with the applicable provisions of the Camas Municipal Code and Shoreline Master Program. The evidence in the record is substantial and supports approval of the application. Therefore, the Applicant respectfully requests that the City approve this Shoreline Substantial Development Permit and Conditional Use Permit application.