

## Shoreline Narrative

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### **Chapter 2: Applicability, Shoreline Permits and Exemptions**

#### **2.1 APPLICABILITY**

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.

*The majority of the proposed project is located either in Lacamas Creek or within 200 feet of Lacamas Creek and its associated wetlands. Though the floodway of Lacamas Creek extends beyond the OHWM of Lacamas Creek, the furthest extent of shoreline jurisdiction is 200 feet from the OHWM in this situation; thus, the extent of shoreline jurisdiction was measured from the OHWM of Lacamas Creek.*

#### **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
- 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.

*The Phase I project proposes to remove an old sewer pump station and associated piping in and near Lacamas Creek and construct two new pump stations, associated access roads, and associated piping in the uplands above the ordinary high water mark of Lacamas Creek. Removal of the old pump station and piping in Phase I of the project will enhance the aesthetic qualities of the shoreline, increase the natural resource values, and help 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 by restoring the area to a more natural state and improving ecological functions of the area. In addition, there will be less risk of contamination of Lacamas Creek in the future by removing these structures, as they are outdated and located within critical areas. One of the proposed pump stations will be constructed outside of the shoreline jurisdiction (Baz Park). The other pump station will be constructed within the shoreline jurisdiction (Trailhead Park). The location of the proposed Lacamas Creek Trailhead Park pump station was the most ideal location, as site is constrained by slopes on its western and eastern sides, and NE 3<sup>rd</sup> Avenue on its southern side. Placement of the pump station further north would not locate it*

*outside of shoreline jurisdiction, and would also restrict the amount of park space available for public use. Additionally, placement of the pump station elsewhere within the site would likely result in a higher amount of native vegetation removal; in its current location, the majority of vegetation removal is of non-native species.*

*The Phase II project proposes to construct park improvements at the existing Lacamas Creek Trailhead Park including a restroom facility, pedestrian sidewalk, stormwater swale, and paving the existing gravel parking lot. This work will use the full potential of opportunities to be created by the proximity between the shoreline and the existing park, and will improve the natural resource values and unique aesthetic qualities of the park through an improved recreational area with enhanced facilities for public enjoyment of the trailhead park and nearby shorelines. A portion of the proposed park improvements will impact a minimal amount of riparian buffer. To compensate for these impacts, mitigation is proposed through stream buffer enhancement and stream buffer restoration. Enhancement consists of native tree and shrub plantings, and restoration consists of non-native invasive species removal, specifically English ivy, Himalayan blackberry, and English Holly, and planting of native trees and shrubs in bare areas. Enhancement and restoration in the riparian buffer will provide an overall ecological lift in the mitigation areas above their pre-project conditions, which will help 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 at the park.*

### **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.

*Portions of the Phase I project will increase the ability of the general public to enjoy the water's edge and to view the water and shoreline from adjacent locations by removing existing pump stations and associated piping that currently obstruct views of the water. The project will have no effect on the ability of the general public to travel on the waters of the state.*

*Portions of the Phase II project will increase the ability of the general public to enjoy the water's edge and to view the water and the shoreline from adjacent locations by constructing pedestrian sidewalks, paving the existing gravel parking lot, and providing bathrooms and public picnic areas that will increase public access to shorelines.*

#### **3.7.2 POLICIES**

1. Provide, protect, and enhance a public access system that is both physical and visual; utilizes both private and public lands; increases the amount and diversity of public access to the State's shorelines and adjacent areas; and is consistent with the shoreline character and functions, private rights, and public safety.

*Both phases of the project will provide, protect, and enhance a public access system that is both physical and visual. Phase I will provide and enhance visual access of Lacamas Creek by removing*

*existing and out of date pump stations and associated piping that currently obstructs views. Phase II will physically and visually provide access to Lacamas Creek and its associated buffers through park improvements and will provide over all ecological lift through mitigation. The project is a City Public Works project and only utilizes public lands. The project increases the amount and diversity of public access to shorelines and adjacent areas through park improvements, including paved parking areas, paved pedestrian areas, picnic areas, and bathrooms. Through these improvements to physical and visual public access, the project is consistent with the shoreline character and functions, private rights, and public safety.*

2. Increase and diversify recreational opportunities by promoting the continued public acquisition of appropriate shoreline areas for public use, and develop recreation facilities so that they are distributed throughout the community to foster convenient access.

*There is no additional public acquisition of shoreline areas for public use for this project; however, improvements from structure removal in Phase I and Lacamas Creek Trailhead Park improvements in Phase II will allow for increased public use of these areas by opening up visual and physical access to these sites.*

3. Locate public access and recreational facilities in a manner that encourages variety, accessibility, and connectivity in a manner that will preserve the natural characteristics and functions of the shoreline. Public access includes both active and passive recreational activities (e.g. trails, picnic areas, viewpoints)

*The project will pave the parking lot at Lacamas Creek Trailhead Park allowing more convenient access for the public to use trails and will construct at least one picnic area for recreational activities. These improvements will encourage variety and accessibility while preserving natural characteristics and functions of the shoreline.*

4. Coordinate public access provisions consistent with adopted city trail system.

*Both Baz and Lacamas Creek Trailhead Parks have public access and are consistent with the adopted city trail system.*

5. Encourage public access as part of each development project by a public entity and for all private development unless such access is shown to be incompatible due to reasons of safety, security, or impact to the shoreline environment.

*Public access is currently a part of both Baz and Trailhead Parks; the project will not change this.*

6. Discourage shoreline uses that curtail or reduce public access unless such restriction is in the interest of the environment, public health, and safety, or is necessary to a proposed beneficial use.

*The project will not have any shoreline uses that curtail or reduce public access, so this section does not apply.*

### **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.

*The Phase I project proposes to remove an old sewer pump station and associated piping in and near Lacamas Creek and construct two new pump stations in the uplands above the ordinary high water mark of Lacamas Creek. Removal of the old pump station and piping will achieve a net gain of ecological function by restoring the area to a more natural state and improving ecological functions of the area. In addition, there will be less risk of contamination of Lacamas Creek in the future by removing these structures. Construction of the Baz Park pump station and associated piping will occur in uplands outside of wetland buffers and shoreline jurisdiction. Construction of the Lacamas Creek Trailhead Park pump station and associated access road will occur partially within the Lacamas Creek buffer and within shoreline jurisdiction; however, the pump station could not be located elsewhere, as it is constrained by steep slopes on the western and eastern portions of the site, and by NE 3<sup>rd</sup> Avenue to the south. Placement of the pump station to the north would not locate it outside of shoreline jurisdiction and would likely require increased amounts of native vegetation removal; additionally, placement of the pump station to the north would restrict the amount of park space available for public use and enjoyment. This new pump station will not obstruct shoreline use and buffer impacts to the Lacamas Creek buffer will be mitigated through buffer enhancement and restoration, resulting in no net loss of ecological function.*

*The Phase II project proposes to construct park improvements at the existing Lacamas Creek Trailhead Park including a restroom facility, pedestrian sidewalk, stormwater swale, and pave the existing gravel parking lot. A portion of the proposed park improvements will occur in Shorelines and impact a minimal amount of riparian buffer. To compensate for these impacts, mitigation is proposed through stream buffer enhancement and stream buffer restoration. Enhancement consists of native tree and shrub plantings, and restoration consists of non-native invasive species removal, specifically English ivy, Himalayan blackberry, and English Holly, and planting of native trees and shrubs in bare areas. Enhancement and restoration in the riparian buffer will provide an overall ecological lift in the mitigation areas above their pre-project conditions, which will help 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 at the park.*

#### **3.11.2 POLICIES**

1. Locate essential public facilities, utilities and circulation systems that are not shoreline dependent outside of the shoreline jurisdiction to the maximum extent possible to reduce interference with either natural shoreline functions or other appropriate shoreline uses. Where possible, avoid creating barriers between adjacent uplands and the shoreline.

*The majority of the public facilities, utilities, and circulation systems associated with the project are located outside of shoreline jurisdiction. Portions of the piping for the pump stations are located beneath existing roads within shoreline jurisdiction; however, this will not affect shoreline dependent uses. The Baz Park pump station is located completely outside of shorelines.*

*The Lacamas Creek Trailhead Park pump station is located in the outer portion of shoreline jurisdiction. No other location for the pump station was feasible in this area, as it is constrained by steep slopes on the western and eastern portions of the site, and by NE 3<sup>rd</sup> Avenue to the south. Placement of the pump station to the north would not locate it outside of shoreline jurisdiction and would likely require increased amounts of native vegetation removal; additionally, placement of the pump station to the north would restrict the amount of park space available for public use and enjoyment. Thus, the non-shoreline dependent uses have been located outside of shoreline jurisdiction to the extent feasible. The public facilities, utilities, and circulations systems located within shoreline jurisdiction do not interfere with natural shoreline functions or other appropriate shoreline uses, do not restrict public access to shoreline dependent uses, and do not create barriers between adjacent uplands and the shoreline.*

2. Provide safe, reasonable, and adequate circulation systems to shorelines where routes will have the least possible adverse effect on shoreline function and existing ecological systems, while contributing to the visual enhancement of the shoreline.

*Phase I of the project consists of removal of pump stations and associated piping in and adjacent to shorelines, which will provide ecological benefit to these shoreline areas and also will improve visual enhancement of the shoreline. Phase I also includes construction of two new pump stations, one of which will be entirely outside of shorelines and one (Lacamas Creek Trailhead Park) that will be located in the outer portion of shoreline jurisdiction. No other location for the trailhead park pump station was feasible in this area, as it is constrained by steep slopes on the western and eastern portions of the site, and by NE 3<sup>rd</sup> Avenue to the south. Placement of the pump station to the north would not locate it outside of shoreline jurisdiction and would likely require increased amounts of native vegetation removal; additionally, placement of the pump station to the north would restrict the amount of park space available for public use and enjoyment. All associated piping and circulations systems for Phase I are located beneath existing impervious surfaces, which results in the least possible adverse effect on shoreline functions. A minor amount of piping will be buried outside of existing impervious surfaces and the disturbed soil above it re-seeded, which will only have a temporary impact on ecological function and will not disturb visual enhancement of the shoreline.*

3. Protect, manage, and enhance those characteristics of shoreline transportation corridors that are unique or have historic significance or aesthetic quality for the benefit and enjoyment of the public.

*No shoreline transportation corridor development is proposed so this section is not applicable.*

4. Encourage alternate modes of travel and provide multiple-use transportation corridors where compatible if shoreline transportation development is necessary.

*No shoreline transportation development is proposed so this section is not applicable.*

5. When new utility and transportation facilities are developed in the shoreline jurisdiction, protect, enhance, and encourage development of physical and visual shoreline public access.

*Phase I of the project proposes construction of a new pump station and access road to Lacamas Creek Trailhead Park. Phase II proposes park improvements to the park. While these utility and*

*transport facilities are proposed to occur in shoreline jurisdiction, they will protect, enhance, and encourage development of physical and visual shoreline public access, as Phase I will provide a safer access road into the park and Phase II will improve park features to increase public access.*

6. Where feasible, relocate existing utility and transportation facilities, such as transmission lines, rail lines, or freeways that limit public shoreline access or other shoreline uses and convert such rights-of-way to new public access routes.

*While the project will not convert the area of the existing pump station removal and pipe removal to a public access route, this phase of the project will increase visual public access.*

7. Utilities and transportation facilities should be installed and facilities designed and located in a coordinated manner that protects the shorelands and water from contamination and degradation.

*The only work that has a potential to contaminate water is the removal of the old wet well pipes. The old wet well and pipes will be pumped and cleaned prior to their removal to prevent any contamination of Lacamas Creek and standard BMP's will be implemented.*

8. Discourage the siting of public facilities in the shoreline jurisdiction, which restrict public access and enjoyment of the shoreline unless no practical alternatives exist.

*The only public facilities sited in the shoreline jurisdiction are the pump station, associated access road, and restroom facility at Lacamas Creek Trailhead Park. Both structures are located in such a way not to restrict public access and enjoyment of the shoreline; in fact, park improvements associated with this project will increase public access and enjoyment, as they will provide a wider range of public recreation activity and will create a safer access road into the site.*

## **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.

### **5.1 General Shoreline Use and Development Regulations**

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

*Phase I and Phase II of the projects are not water-dependent, but portions of the project are water-related/enjoyment, including trails and facilities that will benefit public access to shorelines.*

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

*No portion of the project will cause impacts that require remedial action or loss of shoreline function on other properties, so this section does not apply.*

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.

*The new pump stations will be located in an area where the slope is stable. Shoreline stabilization will not be necessary for these structures.*

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 construction activities will occur until the necessary permits and approvals are obtained from the City of Camas, Ecology, and the Army Corps of Engineers. A critical areas report, restoration and buffer mitigation plan, SEPA, Cultural Resource Study, and Biological Evaluation have been prepared to evaluate how the proposed activities will affect the critical areas, how these impacts will be avoided and minimized, and how the project will result in no net loss of ecological functions.*

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.

*No single-family residential development is proposed as part of this project, so this section does not apply.*

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.

*The proposed activities will be conducted in full accordance and compliance with the CMC Title 17 and Title 18. No proposals have been made to convert, alter, or divide the land within the project area. All project activities will occur in areas which are zoned for this type of development and in areas of existing development.*

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.

*The project does not proposed any development that will interfere with surface navigations, impact public views, or obstruct the passage of fish or wildlife. The only development that will occur below the OHWM will be removal of the existing pump station and associated piping.*

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.

*Prior to removal, existing sewer pipes will be flushed and cleaned to remove potential contaminants. The suspended sewer pipes and any other contaminated materials will be removed and transported offsite to be disposed of at a permitted location. The shoreline will also be protected by employing BMPs to prevent sediments and other contaminants from discharging into Lacamas Creek.*

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.

*All in water work will take place according to the permitted timing according to WDFW and the Army Corps of Engineers.*

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.

*A restoration and buffer mitigation plan was created by Ecological Land Services to demonstrate that all efforts will be made to minimize impacts in the critical areas and their buffers. A portion of the project will be self-mitigating because the removal of the existing pump station and its associated piping and piles will restore the project area to its natural conditions. Temporarily disturbed areas will be reseeded with a native seed mix to ensure no net loss of ecological functions. A small portion of the project will result in permanent impact to the buffer of Lacamas Creek Trailhead Park. Impacts from this portion of the project were first avoided, then minimized to the fullest extent possible, and finally mitigated for to result in no net loss of ecological functions, and are further detailed in the restoration and buffer mitigation plan.*

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

*There are no in-stream structures proposed as part of the project, so this section does not apply.*

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.

*The project does not fall under this grant relief, so this section does not apply.*



## 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.

*No provisions for adequate public access are included for the Phase I, as removal of the existing pump station and associated piping will not restrict public access. The Phase I construction of the Lacamas Creek Trailhead Park pump station will improve public access, as the proposed access road for this pump station will create safer public access than the existing road. Phase II of the project will improve existing public access of Lacamas Creek Trailhead Park, as it proposes park improvements through parking improvements, road access improvements, and recreational improvements.*

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:

*As Phase I and Phase II of this project will improve existing public access, this section does not apply.*

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.

*Phase I and Phase II of this project will provide a barrier free route of travel. Phase II involves park improvements that will construct facilities fulfilling criteria within the Americans with Disabilities Act Accessibility Guidelines.*

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

*Phase I of this project will not increase the likelihood of trespass or other adverse impacts to neighboring properties. Phase II of this project will improve public access through park improvements, but only proposes improvements to existing points of access in Lacamas Creek Trailhead Park. The project does not propose any new access points bordering adjacent properties that could possibly result in an increased amount of trespass or other adverse impacts to neighboring properties.*

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

*There are existing signs at entrances of both Baz Park and Lacamas Creek Trailhead Park indicating public access to the trails leading to the shoreline areas. Additional enhanced trailhead signing will be installed with the Phase II Lacamas Creek Trailhead Park improvements.*

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

*Physical and/or visual access currently exists in all project areas, and may only be temporarily restricted during construction of pump stations and park improvements. Public access will be restored following completion of construction and park improvements.*

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.

*While no new dedications to public access are proposed for Phase I or Phase II of this project, Phase II of the project proposes improvements to existing public access walkways that will fulfill this provision.*

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.

*Lacamas Creek Trailhead Park and Baz Park are both public lands and public easements are not required.*

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

*The project proposes to enhance public access. Although none are currently planned, it is anticipated that any future actions would also serve to enhance public access.*

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.

*Maintenance of the pump stations and park facilities will be the responsibility of the City of Camas.*

## **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.

*Disturbance to soils and native vegetation within the shoreline and critical areas buffers during Phase I of the project will be avoided whenever possible. Any disturbance of soils in this area will be limited to what is absolutely necessary to complete the removal of the old pump station and pipes. Native, clean soils will be placed in areas where structures have been removed, and any bare ground will be reseeded with native seed mix. Some grading and placement of impervious*

*surfaces is necessary for construction of the Lacamas Creek Trailhead Park pump station; however, impacts from this pump station and its associated access driveway have been minimized by placing these structures in the outer portion of shoreline jurisdiction and the Lacamas Creek riparian buffer. No other location for the trailhead park pump station was feasible in this area, as it is constrained by steep slopes on the western and eastern portions of the site, and by NE 3<sup>rd</sup> Avenue to the south. Placement of the pump station to the north would not locate it outside of shoreline jurisdiction and would likely require increased amounts of native vegetation removal; additionally, placement of the pump station to the north would restrict the amount of park space available for public use and enjoyment. To mitigate for unavoidable impacts to the Lacamas Creek riparian buffer, a combination of enhancement and restoration is proposed to result in no net loss of ecological function.*

*Disturbance to native vegetation within shoreline jurisdiction and critical area buffers during construction of Phase II of the project will also be avoided whenever possible. Bare areas resulting from grading for park improvements will be reseeded with native seed mix, and the majority of park improvements have been located in existing impervious surface footprints to minimize impacts. To mitigate for unavoidable impacts to the Lacamas Creek riparian buffer, a combination of enhancement and restoration is proposed to result in no net loss of ecological function.*

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

*Impervious surfaces have been minimized to the extent feasible. The majority of installation of the new piping associated with the new pump stations will occur within existing roads. The Lacamas Creek Trailhead Park pump station will place new impervious surfaces within the outer portion of shoreline jurisdiction; however, this was the only feasible location for the pump station, as it is the flattest portion of the existing park and its current location preserves as much public park use as possible. The pump station location is restricted on the western and eastern sides by slopes as well as an abundance of native vegetation. It is restricted on its southern end by the existing NE 3<sup>rd</sup> Avenue road. Even if the pump station was moved north from its current position, it would still be within shoreline jurisdiction and would also restrict public use of the park. In its current proposed location, the pump station requires minimal grading and the majority of vegetation removal is of non-native trees; additionally, a large portion of the park can be used for public enjoyment.*

*A minimal amount of grading and placement of impervious surfaces is necessary for the park improvements in Phase II. Areas of grading that will not be covered in impervious surfaces will be reseeded with native seed mix following construction, and the majority of the parking lot improvements will occur within the existing gravel/pavement footprint, minimizing impacts. The park improvements, some of which require placement of additional impervious surfaces, will allow more diverse and increased public use of the park and are not anticipated to impact public safety.*

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

*The existing access road into the trailhead park site will not be utilized, as it is considerably more dangerous than the proposed access road.*

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.

*Vehicle and pedestrian circulation systems have been designed to minimized clearing, grading, alteration of topography and natural features, and to accommodate wildlife where feasible. This was done by way of designing the park improvements and new access roads places both within existing gravel/pavement footprints and within the flattest portion of the park, requiring minimal removal of mostly non-native vegetation. However, a new vehicular access road to the Lacamas Creek Trailhead Park pump station and parking lot is proposed, as the existing road poses a danger to incoming and outgoing cars. Clearing, grading, and/or alteration of natural features for this access road will be mitigated through invasive species removal and installation of native trees and shrubs to result in no net loss of ecological functions.*

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.

*All new pump stations and parking lot improvements will be located landward of the OHWM and landward of water-oriented portions of the principle use. Only the removal of the old pump station and old piping will occur below 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.

*Existing vegetation and proposed mitigation and landscape vegetation will provide visual and noise buffering from roadways, parking areas, and other adjacent properties with dissimilar uses.*

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

*No new trails or access points are proposed to be added within the wetland. Construction vehicles will utilize existing trails and access roads to conduct pump station and associated piping removal within sensitive areas.*

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

*Fencing will be erected around pump stations, but are not anticipated to significantly interfere with wildlife movement. Retaining walls for the stormwater facility and rain gardens are proposed, but will not obstruct natural areas. Plants installed for landscaping and mitigation purposes will provided screening from surrounding uses, but will not interfere with wildlife movement.*

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.

*Minimal outdoor lighting will be provided for the pump station and restroom. Lighting will be wall-mounted and shielded to prevent light trespass beyond the immediate area.*

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

*All of the new utility piping will occur within rights-of-way.*

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.

*No known aquaculture sites exist in the vicinity of the project area, so this section does not apply.*

#### **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.

*No clearing or grading is proposed for pump station and associated piping removal in Phase I. Fill will consist of gravel in the old wet well, and native soils in the manhole top cone removals and concrete-encased pipe removals, which will not affect the shoreline environment or cause damage to water quality or aquatic life. Clearing and grading is proposed within the outer portion of shoreline jurisdiction and the Lacamas Creek riparian buffer for construction of a pump station in Lacamas Creek Trailhead Park. BMPs will be utilized to prevent sediment discharge into Lacamas Creek, and impacts to the riparian buffer will be mitigated through enhancement and restoration within the riparian buffer.*

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

*Clearing and grading for construction of the Lacamas Creek Trailhead Park pump station, new access road, paved parking, and restroom facility will not result in substantial changes to surface water drainage patterns off the project site, as stormwater will be collected and infiltrated through stormwater facilities within the project site, including rain gardens. Areas of clearing and grading that will not be covered with impervious surfaces or structures will be reseeded with native seed mix following completion of construction.*

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

*Erosion control fencing will be installed prior to construction to prevent sediment from washing into Lacamas Creek. After construction, any bare soils will be seeded with a native seed mix. Native plantings will also be installed as a part of landscaping and mitigation.*

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

*Although areas of grading or grubbing are not anticipated to occur for an extended duration, any graded or grubbed areas will be reseeded with native seed mix until construction activities are completed.*

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 clearing, filling, or excavation is proposed where shoreline stabilization will be necessary to protect materials placed or removed, so this section does not apply.*

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.

*The amount of fill was minimized to the extent possible and will only occur in conjunction with a permit from the U.S. Army Corps of Engineers, and will only be placed following removal of manhole covers and concrete pipe encasements within Phase I of the project.*

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.

*All fill material used, including gravel and native soils, will be screened and acquired from a permitted location to ensure that it is uncontaminated. No polluted materials will be used.*

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

*Fill will only be placed in the wet well of the existing pump station to match existing grade, where manhole covers are removed and backfilled, and where concrete encasements on buried pipes are removed and filled. Fill in the wet well consists of clean gravel. The manhole will first be filled with clean gravel and then topped with native backfill. Where the concrete encasement is removed, the area will be filled with native backfill. The fill in these areas will be designed to allow water penetration in the areas where it occurred prior to filling.*

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

*No fill will be placed below the OHWM of Lacamas Creek.*

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.

*No fill is proposed waterward of the OHWM, so this section does not apply.*

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.

*The project does not propose any fill for beach nourishment, so this section does not apply.*

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

*No excavation is proposed below the OHWM, so this section does not apply.*

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 pump station and piping removal of Phase I, disturbed areas will be reseeded with native seed mix. Within pump station construction of Phase I, cleared or disturbed areas will be reseeded with native seed mix and mitigation areas will be planted with native trees and shrubs. These areas will also be maintained so that vegetation becomes re-established. Areas graded for park improvements in Phase II of the project will be reseeded with native seed mix.*

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.

*The project does not propose to convert the use of any land so this section does not apply.*

### **5.7.3 BUILDING DESIGN**

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

*To the extent feasible, pump station construction in Phase I and park improvements in Phase II were constructed to minimize disturbance to soils and native vegetation. The Baz Park pump station is proposed in a flat area with few trees, and the Lacamas Creek Trailhead Park pump station and proposed access road are proposed in the area of the park with the least trees. The majority of park improvements are within the existing gravel/pavement footprint in trailhead park.*

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 proposed pump stations have reduced scale to the extent possible while still accomplishing their functions. Removal of the existing pump station and overwater pipe will improve views of the watershed.*

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

*No buildings are on or adjacent to the water, so this section does not apply.*

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.

*No proposed structures will be taller than two stories, so this section does not apply.*

## **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.

*Phase I avoided impacts to native vegetation where feasible. For the removal of the existing pump station and associated piping, construction vehicles will utilize existing access roads and trails where feasible to minimize disturbance to vegetation. Where native herbaceous vegetation and soils are disturbed, the area will be seeded with native seed mix following removal. For the construction of the new Baz Park pump station, native vegetation disturbance will be concentrated in the footprint of the new pump station and any disturbance to herbaceous vegetation will be reseeded with native seed mix following construction. For construction of the new Lacamas Creek Trailhead Park pump station and associated access driveway, some large native vegetation will be removed. Impacts to native vegetation were avoided where feasible; however, the location of the pump station is restricted by slopes on the western and eastern portion of the park site, and relocation of the pump station west or east would not only require a substantial increase in grading but would also require increased native vegetation removal. The current location of the pump station requires less grading and preserves a large portion of the existing trailhead park for public recreation and use. Though the current location does require a small amount of vegetation removal, the majority of the removed species are non-native and will be replaced with native tree and shrub plantings through mitigation in enhancement and restoration areas.*

*The majority of Phase II construction occurs within the existing gravel/pavement footprint in Lacamas Creek Trailhead Park. This plan minimizes impacts by utilizing this footprint, and results in a minor amount of native vegetation removal that will be mitigated through invasive species removal and native tree and shrub plantings.*



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.

*A Critical Areas Report and Restoration and Buffer Mitigation Plan were created by Ecological Land Services following Appendix C in the Shoreline Management Plan and demonstrate that the impacts will be compensated for and result in no net loss of shoreline functions.*

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.

*Clearing by hand-held equipment of invasive, non-native vegetation is proposed for the restoration area, and bare areas created as a result of this clearing will be planted with native trees and shrubs detailed in the Restoration and Buffer Mitigation Plan.*

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

*Non-native vegetation to be removed will be replaced with native vegetation within the enhancement and restoration areas.*

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 pruning of trees is proposed as part of this project, so this section does not apply.*

6. Topping trees is prohibited.

*No tree topping is proposed as part of this project, so this section does not apply.*

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 hazardous tree removals are proposed as part of this project, so this section does not apply.*

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.

*No snags, stumps, logs, uprooted trees, or other natural habitat features are proposed to be removed as part of the project. These features will be left untouched within the critical areas.*

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 natural in-stream features will be removed as part of this project, so this section does not apply.*

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 as part of the project, so this section does not apply.*

#### **6.3.10 PARKING**

1. Parking as a primary use is prohibited.

*The proposed project is for the removal of an existing pump station and associated piping, and the construction of two new pump stations and associated access roads, with accompanying park improvements in Lacamas Creek Trailhead Park. The majority of the proposed parking lot will be constructed within the footprint of the existing gravel/pavement parking lot that serves the park; however, parking is not the primary use of the Park or this project..*

2. Parking as an accessory use may serve uses that are not physically within shoreline jurisdiction, but are located on the same parcel.

*The proposed park improvements, including parking lot improvements, will serve as an accessory use to Lacamas Creek Trailhead Park and the trails, which are both entirely or partially within the same parcel, within shoreline jurisdiction, and are also water-related/water-enjoyment uses.*

3. Parking facilities shall be designed and landscaped to minimize adverse environmental and aesthetic impacts. Parking shall be located landward of the use it is serving, only if it is not located along the primary street frontage. The city prefers buildings entrances (not a parking lot) to benefit from the city's extensive sidewalk and trail network.

*The parking lot improvements will not occur landward of their use, but this will minimize adverse environmental and aesthetic impacts, as they will be conducted within the existing footprint of the current trailhead park gravel/pavement parking area. A minor amount of parking lot improvements will result in placement of impervious surfaces within shoreline jurisdiction and the Lacamas Creek buffer, but will be mitigated through enhancement and restoration to result in no net loss of ecological functions and increased public access to enjoy shorelines.*

4. Parking areas shall be landscaped along the perimeter. Landscaping shall consist of native vegetation, which is planted prior to final inspection of project, and will provide effective screening within three years of planting.

*Landscaping is proposed along the perimeter of the trailhead parking lot improvement area, and consists of native plantings.*

5. Parking facilities shall be designed to prevent surface water runoff from contaminating water bodies. Permit shall include evidence of financial surety for ongoing maintenance program that will assure proper functioning of facilities over time.

*Stormwater management for all improvements will be constructed in accordance with the City of Camas' stormwater code and the Stormwater Management Manual for Western Washington using best management practices (BMP's). A preliminary stormwater report is included with this application. All facilities will be maintained by the City of Camas.*

*At Baz Park it is anticipated that the amount of impervious area will be below the threshold for triggering flow control requirements. Stormwater from the pavement surface will sheet flow from the pump station surface and stormwater treatment will be provided by filtering through the surrounding vegetation.*

*At Lacamas Creek Trailhead Park, stormwater runoff will be collected and treated. Treatment will be attained with vegetated rain gardens and/or infiltration through approved soil media, depending on if test results from the site soils indicate that it has the required organic content and cation exchange capacity.*

#### **6.3.11 RECREATIONAL DEVELOPMENT**

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

*This project does not propose water-oriented uses, but does propose water-related and water-enjoyment uses in Phase II, which includes improvements to public access and enjoyment through parking lot improvements, restroom facility installation, and picnic area installation.*

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.

*The project does not propose to create any trails so this section does not apply.*

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

*Removal of the existing pump station and associated piping will improve visual access in the area of removal. Additionally, the project proposes park improvements through construction of a picnic area, which will provide physical public access to shorelines.*

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.

*The parking area to be paved is located upland of Lacamas Creek. The parking area is within 150 feet of the shoreline, but is proposed within the footprint of an existing gravel/pavement parking area associated with Lacamas Creek Trailhead Park, minimizing soil and native vegetation disturbance.*

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).

*No recreational structures or facilities will be built within mapped floodways, so this section does not apply.*

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.

*Park improvements associated with Phase II of the project include construction of restrooms with hand washing facilities in accordance with public health standards and without adversely altering natural features.*

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.

*The project will retain existing vegetation and provide vegetated buffer strips and landscape screening, to protect the value and enjoyment of adjacent or nearby private properties and natural areas from trespass, overflow, as well as other possible adverse impacts.*

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.

*The project does not propose the construction of recreational developments requiring the use of fertilizers or pesticide in areas adjacent to shorelines, so this section does not apply.*

#### **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.

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.

*The majority of the placement of sewer pipes will occur outside of shoreline jurisdiction; where placement of sewer pipes occurs within shoreline jurisdiction, it is within the easement or footprint of existing roads. The proposed Baz Park pump station is located outside of shoreline jurisdiction; however, the proposed trailhead park pump station is located within shoreline jurisdiction. This pump station could not be located outside of shoreline jurisdiction, as the site is constrained by slopes on the western and eastern portions of the site, and an existing road on the southern portion of the site. Moving the pump station to the north would not place it outside of shoreline jurisdiction and would also limit the amount of park space available for public access and enjoyment of shoreline areas. In addition to this, placement of the pump station west, north, or east of its current location would require increased amounts of native vegetation removal. In its current location, the majority of vegetation removal is of non-native species.*

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 overhead electrical transmission lines are proposed for this project, so this section 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 has designed, located, and installed utilities to preserve the natural landscape and minimize impacts to scenic views and planned land and shoreline uses to the extent feasible. The sewer pipes will run underneath roadways and will not obstruct any views or planned land or shoreline uses. The new pump stations will occur in parks that will retain public access after construction of the pump station. A minimal amount of non-native vegetation will be removed for construction of the Lacamas Creek Trailhead Park pump station; however, proposed enhancement and restoration of the Lacamas Creek buffer will compensate for these vegetation impacts.*

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.

*Transmission, distribution, and conveyance piping associated with the project will occur within rights-of-way.*

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 project does not propose any utility production or processing facilities, so this section does not apply.*

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:

*No stormwater control facilities are proposed as part of this project, so this section does not apply.*

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.

*No new outfalls or modifications to existing outfalls are proposed. Stormwater will be infiltrated on site.*

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.

*No water reclamation discharge facilities are proposed as part of this project, so this section does not apply.*

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.

*The project does not propose to build within the wetland or its perimeter, so this section does not apply.*

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 as part of this project, so this section does not apply.*

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.

*No removal of vegetation is proposed, but bare soils (which will be exposed from the removal of the current pump station and exposed pipes) will be reseeded with a native seed mix to restore the area to natural conditions.*

## **Appendix B**

### **X. CONDITIONAL USE**

- A. For any use activity which may not be compatible with the shoreline environment in which it is proposed, as defined in the Program, a conditional use permit shall be required. The SMRC or the hearings examiner may recommend performance standards to make the use more compatible with other desirable uses within that area. These provisions shall apply only when it can be shown that extraordinary circumstances exist and that the public interest would suffer no substantial detrimental effect. Conditional use approval may be approved only if the applicant can demonstrate all of the following:

1. The use will cause no significant adverse effects on the environment or other uses;

*This project will enhance the function of the shoreline in the area by removing the existing pump station, its associated pipes and piles which will restore the area to its natural conditions. The new pump stations have been located within existing uplands so as to avoid environmental impacts to every extent feasible; however, a portion of the Lacamas Creek Trailhead Park pump station and park improvements to the park will impact the Lacamas Creek buffer. To compensate for these impacts, mitigation in the form of enhancement and restoration of areas within the riparian buffer is proposed to result in no net loss of ecological function. Further details may be found in the restoration and buffer mitigation plan prepared by Ecological Land Services.*

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

*The new sewer pump stations will not interfere with public use of the shoreline and will be located further away from the shoreline than the existing pump station. Removal of the current pump station and its associate piping will also make the shoreline along Lacamas Creek more aesthetically pleasing for the public. A new access road associated with the construction of trailhead park pump station in Phase I will improve public use of shorelines because it will provide safer access in and out of the park. Park improvements associated with the trailhead park pump station will also improve public access by providing improved parking lot area, restrooms, and picnic areas.*

3. Design of the development will be compatible with the surrounding authorized uses, the Program, and the comprehensive plan; and

*The new sewer pump stations will help to support the growth of residential and commercial development in the area. The project works to support the surrounding authorized uses. In*

*this way, the project is compatible with the goals and policies of the Program and the City of Camas comprehensive plan.*

4. The proposed use is consistent with the general intent of the Program, and the Act.

*The project will work to enhance the shoreline through removal of the current sewer pump station, its piping, and piles which are on the shoreline and within Lacamas Creek. Proposed construction of two new pump stations in Phase I and park improvements in Phase II will enhance and improve public access and use of shorelines by improving access to water-related/water-enjoyment shoreline use, as well as improving public use of these areas by establishing restroom facilities and additional recreational opportunities such as picnic areas. The project requires some permanent impacts to Lacamas Creek buffer, but will be mitigated through buffer enhancement and restoration resulting in no net loss of ecological function. The project has also located construction and development within existing impervious surface footprints and has avoided environmental impacts where feasible. In this way, the proposed use is consistent with the general intent of the Program and the Act.*