Memorandum

Date:	August 17, 2020
Subject:	Site Assessment and Permit Evaluation Lower Prune Hill Booster Pump Station (31000047.000)
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To:	Andy Miles, PE, Murraysmith
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INTRODUCTION

The City of Camas (City) Public Works Department proposes to replace the Lower Prune Hill Booster Pump Station (LPH BPS) located at the intersection of Northwest 18th Loop and Northwest Ostensen Canyon Road within the Camas city limits. The proposed replacement will consist of three 300-horsepower pumps, a concrete masonry block security building, and a backup generator. The existing LPH BPS and backup generator will remain in operation during construction of the new booster pump station, and disconnected, removed, and backfilled after the new booster pump station has been brought online.

WSP conducted a site assessment to determine the general extent of any wetlands, streams, and/or fish and wildlife habitat conservation areas that could be impacted by the LPH BPS and conducted a permit evaluation to confirm permitting requirements and submittal requirements for the Camas land use and environmental permitting processes. The results of the site assessment and permit evaluation are discussed in detail in this technical memorandum.

SITE ALTERNATIVES

Site alternatives for the Camas Lower Prune Hill Pump Station project initially include four siting alternatives: Site 1 (PS1), Site 2 (PS2), Site 3 (PS3), and Site 4 (PS4), as shown in the figure below. However, since the inception of the project PS3 and PS4 have been eliminated from consideration and only PS1 and PS2 are discussed in this memorandum.

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Figure 1. Initial siting options

PS1 is located on City-owned parcel 85173001 and PS2 is located on City-owned parcel 85145001, which contains the existing Lower Prune Hill Pump Station at 600 NW 18th Loop in Camas, Washington. The PS1 site has access from the existing access off NW 18th Loop and possibly from the north off NW 18th Avenue. The PS2 site would have access from NW 18th Avenue. The parcel, and subsequently both alternatives, is zoned Single-Family Residential R1-7.5.

LAND USE AND ENVIRONMENTAL PERMITS

Based on a review of city code and project understanding, the applicable City land use permits/review for the PS1 site include:

- Conditional Use Permit
- Major Variance
- Site Plan Review
- Minor Design Review
- State Environmental Policy Act (SEPA) Checklist
- Tree Permit
- Critical Areas Permit (for Geologic Hazard Areas)
- Lot or Boundary Line Adjustment Consolidation

City-required permits for PS2 include:

- Conditional Use Permit
- Exempt from Major Variance as it appears setbacks can be met
- Site Plan Review
- Minor Design Review
- SEPA Checklist
- Tree Permit
- Critical Areas Permit (for Geologic Hazard Areas)
- Lot or Boundary Line Adjustment Consolidation

Each permit and their requirements are discussed in detail in the following sections. Permits for the other alternatives that are not discussed further in this memorandum include:

- Archaeological Review
- Fire Department Review (Murraysmith should check on planned building materials and property line separation, especially for the PS1 alternative with the neighbor's shed close to the property line.)
- Building Permit and Plan Review based on the valuation of the project
- Engineering Review (It will be critical to determine if the existing PS1 access drive can be expanded to a 12-foot paved width per request by the Public Works Department in the pre-application conference summary report, and if there is sufficient room based on the assumed easement to the Lower Prune Hill Pump Station.)

Conditional Use Permit and Major Variance

The conditional use permit, variance, and site plan review processes would be consolidated into one review process with one hearing before the hearings examiner. (The site plan review and design review processes would also be included in that hearing.)

The conditional use permit criteria focus on compatibility of the proposed development. Key to this compatibility will be landscaping and screening from adjacent land uses. The City code does not specify landscaping and screening standards for public pump station development adjacent to residential areas, so it will be important to develop a landscaping and screening plan that properly screens the pump station and ancillary improvements.

The variance process requires addressing several approval criteria that fundamentally require a detailed explanation justifying the need and explaining why other alternatives that wouldn't require a variance are not practicable. As a conditional use permit is also required, the previously discussed compatibility issues with adjacent land uses will be equally important to the need for a variance.

The city setback and dimensional requirements are:

- Min. front yard 30 feet
- Min. side yard 15 feet
- Min. rear yard 35 feet

- Max. building lot coverage 40 percent
- Max. building height 35 feet

Per conversation with Lauren Hollenbeck, City planner, there are options for determining the front yard setback based on access to each alternative; front yard setbacks are typically determined from where the access drive is oriented and the location of the front of the building. It appears that the PS2 can meet City setback requirements; however, the PS1 pump station location will require a major variance for either the front or rear yard setback.

Site Plan Review

A site plan review application will be required for the proposed pump station development improvements, per Camas Municipal Code (CMC) 18.18.

Detailed development plans will be needed as part of this permitting process. The site plan review application process includes a preliminary and final site plan review application process which are identified below.

Minor Design Review

The minor design review process requires submittal of information explaining building materials and colors, and building elevations, and a lighting plan with specifications. The City will require photos showing the building and roof materials and colors. The minor design review process will not require review by the City Design Review Committee.

State Environmental Policy Act

As the site contains critical areas, (geologic hazard areas as detailed below) it is not categorically exempt from the requirements of the State Environmental Policy Act (SEPA) per CMC Section 16.07 and a SEPA checklist is required.

Tree permit

Tree permits are based on meeting tree density requirements for the overall site. If it can be shown through a tree survey completed by a licensed arborist that the site has 20 tree units per acre with planned tree removal, then a tree permit is not needed, just a tree survey. A portion of the site is mapped on the Clark County GIS as having geohazard areas. Per conversation with Lauren Hollenbeck, tree units cannot be counted within areas on site that are determined by a geotechnical engineer to be geologic hazards areas. Tree density for the remaining portion of the site is calculated for both hazardous trees and healthy trees. If the 20 tree units per acre tree density will not be achieved, then a landscape, tree, and vegetation plan will be required per CMC 18.13.040 and CMC 18.13.050 showing that 20 tree units per acre will be achieved. Tree removal will need to be supported explaining the need for tree removal. Particular attention will be focused on justifying removal of larger trees.

Critical Areas Permit

CMC 16.51.010 designates and classifies ecologically sensitive and hazardous areas and protects these areas and their functions and values, while allowing for some reasonable use of the property. Critical areas regulated by this chapter include wetlands, critical aquifer recharge areas (CARAs), frequently flooded areas, geologically hazardous areas, and fish and wildlife habitat

conservation areas. Additionally, all areas within the city meeting the definition of one or more critical area, platted natural open space areas, and conservation covenant areas – regardless of any formal identification – are designated critical areas and are subject to the provisions of the chapter.

Site Visit

On June 18, 2020, a WSP senior scientists visited the subject site to review existing environmental conditions, confirm the presence or absence of critical areas, and evaluate the site for potential constraints regarding development of the proposed pump station. The scientists walked the study area and noted the existing vegetation, topography, hydrology, and habitat features, as well as other conditions that may constitute a critical area. Prior to completing the site visit, the scientists reviewed the following resources to determine if any critical or sensitive areas were mapped within the study area:

- National Wetlands Inventory (NWI) database produced by the U.S. Fish and Wildlife Service (USFWS)
- The Washington Department of Fish and Wildlife Priority Habitats and Species PHS on the Web database
- Clark County GIS MapsOnline database
- USFWS Information for Planning and Consultation (IPaC)
- Washington Department of Natural Resources (DNR) Natural Hazards mapper

Observed Conditions

The approximately 1.42-acre study area is located within the City-owned Parcel Nos. 85145001 and 85173001. The site is located in residential neighborhood on Prune Hill and is fenced with two water reservoirs and an existing pump station. Vegetation within the fenced area mainly consists of mowed grasses with English ivy (*Hedera helix*) located on the hillslopes. Vegetation outside of the fence along the eastern portion of the site includes a canopy of Douglas fir (*Pseudotsuga menziesii*) and bigleaf maple (*Acer macrophyllum*), with a sub-canopy dominated by hazelnut (*Corylus cornuta*) and Indian plum (*Oemleria cerasiformis*). The herbaceous layer is composed mostly of English ivy. The topography of the area slopes down to the southeast, with the steepest slopes in the northeast corner and along the eastern boundaries of the study area. The study area does not contain any defined hydrologic channels or waterways.

Critical Areas Ordinance

Wetlands (CMC Chapter 16.53)

Clark County Maps Online and the USFWS NWI databases do not indicate the presence of any wetlands within the boundaries of the study area, and the site investigation confirmed that no wetlands are present at the site. Therefore, it is anticipated that development on the site will not trigger the need for compliance with the wetland provisions of the City's critical areas ordinance.

Critical Area Aquifer Recharge Areas (CMC Chapter 16.55)

According to the City's adopted CARA map, the subject site is not located within a CARA (confirmed by the City), and therefore, is exempt from CARA standards.

Frequently Flooded Areas (CMC Chapter 16.57)
Under CMC 16.57, frequently flooded areas include the areas of special flood hazard identified by the Federal Insurance Administration. Special flood hazard areas are those areas subject to inundation by the 1 percent annual chance flood (100-year flood). Review of FEMA Flood Insurance Rate Map panels 53011C0533D indicate that the site is not within an area of special flood hazard; therefore, the frequently flooded provisions of the CMC do not apply.

Geologically Hazardous Areas (CMC Chapter 16.59)
Geologically hazardous areas, as defined by CMC 16.59, are those areas susceptible to erosion hazard, landslide hazard, seismic hazard, mine hazard, and other geologic events. These sites, and their presence within the study area, are addressed individually below.

- Areas susceptible to erosion hazards include areas with slopes equal to or greater than 40 percent slopes; Clark County Maps Online indicates that the greatest slopes within the study area range between 40 and 80 percent, and WSP scientists confirmed that the topography of the site is very steep in the northeast corner and along the eastern boundary. Therefore, the site contains erosion hazards that will need to be addressed with a geotechnical report and critical areas report.
- The CMC indicates that landslide hazard areas are those potentially subject to landslides based on a combination of geologic, topographic, and hydrologic factors. Clark County Maps Online indicates the presence potentially unstable slopes within the study area that will need to be addressed in the critical areas report.
- Seismic hazard areas are those areas subject to severe risk of damage as a result of earthquake-induced soil liquefaction, ground shaking amplification, slope failure, settlement, or surface faulting. Relative seismic hazards are mapped on the National Earthquake Hazards Reduction Program site class map of Clark County. According to Clark County Maps Online, the entire site is mapped as very low to low susceptibility of liquefaction and does not qualify as a seismic hazard.

For the geologic hazards area the project will need a geotechnical professional to determine the slope and slope stability. CMC 16.59.050 identifies that "Construction of new buildings with less than two thousand five hundred square feet of floor area or roof area, whichever is greater, and which are not residential structures or used as places of employment or public assembly are allowed in geologically hazard areas and do not require submission of a critical areas report."

CMC 16.59.090(A)(5) states that "Utility lines and pipes shall be permitted in erosion and landslide hazard areas only when the applicant demonstrates that no other practical alternative is likely. The line or pipe shall be appropriately located and designed so that it will continue to function in the event of an underlying failure." And CMC16.59.090(A)(7) states that "Roads and utilities may be permitted within a geologic hazard area or management zone if the city determines that no other reasonable alternative exists which could avoid or minimize impacts to a greater extent."

According to these to provisions, it appears that a critical areas report will be required to address the utility lines and pipes, but the pump station structure may not require under this section of the critical areas ordinance.

Fish and Wildlife Habitat Conservation Areas (CMC Chapter 16.61)
Fish and wildlife habitat conservation areas include:

- Areas with which state or federally designated endangered, threatened, and sensitive species have a primary association
- State priority habitats and areas associated with State priority species
- Habitat of local importance
- Naturally occurring ponds under 20 acres
- Waters of the state
- Bodies of water planted with game fish by a governmental or tribal entity
- State natural area preserves and natural resources conservation areas

The USFWS IPaC database indicates that six ESA-listed species could potentially exist at the study site: grey wolf (*Canis lupus*), streaked horned lark (*Eremophila alpestris strigata*), yellow-billed cuckoo (*Coccyzus americanus*), bull trout (*Salvelinus confluentus*), golden paint brush (*Castilleja levisecta*), and water howellia (*Howellia aquatillis*); however, none of these species, or suitable habitat for any of these species was identified within the boundaries of the study area during the site visit. No other state or federal priority habitats or species are mapped within the boundaries or vicinity of the site, and scientists confirmed that no other fish and wildlife habitat conservation areas, as they are designated in the code, exist within or near the proposed well site. Therefore, the project will not require a critical areas permit or a demonstration of compliance with the Fish and Wildlife Habitat Conservation Area provisions.

LOT OR BOUNDARY LINE ADJUSTMENT CONSOLIDATION

The PS1 site has a separate tax parcel number from the PS2 site and the City has requested that a tax lot or legal lot consolidation be completed, depending on the legal lot status of the tax lots. WSP understands that PBS surveying is evaluating the tax lot versus legal lot issue. The tax lot consolidation process can be completed through the Clark County Assessor's office, but the boundary line adjustment process requires the submittal of an administrative boundary line adjustment application to the City followed by recording at the Clark County Assessor's office.

PERMITTING PROCESS

The permitting process timelines include a 28 day fully complete process, followed by a 120-day approval process including a hearings examiner hearing for the conditional use permit, variance, site plan review, and design review.

The final site plan review process will follow the preliminary site plan review process with the Hearings Examiner and this process includes a 28-day fully completed process. If revisions to the application are necessary, then another 14 days will be added to this review timeline following resubmittal of application materials. The overall final site plan approval process, which is typically submitted with the final engineering process, requires approximately 60 days of City review time, assuming one round of review/redlines from the City. This does not include the time for the consultant team to revise the engineering plans. Final design review permitting issues will also be addressed concurrently with the final site plan review process.

SUMMARY AND RECOMMENDATIONS

From a land use compatibility and city code compliance standpoint, the PS1 site appears to be the best alternative because of the sunken grade that screens it from adjacent homes and the home to the south is partially buffered by a shed. The existing piping in place with the water tank to the north also makes the PS1 option more desirable. The limited distance to the southern property line for the PS1 will require some creative design with fencing and screening; using a decorative wood fence, similar to the neighbor to the south with arborvitae (or other columnar shrubbery) behind the fence might be best.

The PS2 option would place the pump station in a highly visible location from the home on the north side of NW 18th Avenue and from a large window of the home directly to the west. The pump station would also be in a location with a territorial view and impacting that view may be difficult to support if the PS1 option is possible. Additionally, the PS2 drive access looks quite challenging, given the significant grade, and it would run parallel to several homes. This access may be difficult to screen from the adjacent residential properties.

If PS1 is pursued as the preferred alternative, we would recommend that the existing access be maintained. We are not sure if there is an option for a road modification for the driveway access width. It will be important to discuss the expansion of the existing access drive to a 12-foot paved surface (as noted in the City's pre-application conference summary report) with City Public Work's staff.

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