



May 14, 2024

PAK USA Camas, LLC
Attention: Taz Khan
3993 NW Currawong Court
Camas, WA 98607

RE: 13th Street Gas Station Department of Ecology Comment Response (SEPA23-12)

Dear Mr. Khan:

Please find below our responses to comments received from the Washington Department of Ecology (Ecology) in a letter dated March 6, 2024. Comments are stated or paraphrased below in *italics* followed by ELS responses in regular font. This memorandum will address comments by Megan Tait related to Shorelands and Environmental Assistance. The remaining Ecology comments will be addressed by the project engineer.

ECOLOGY COMMENTS

The wetland delineation was conducted in August, typically a dry time of the year for the region. Per the Corps of Engineers WMVC regional supplement to the wetland delineation manual, additional field investigation is necessary to determine whether a wetland is present. One or more site visits should be scheduled to coincide with the normal wet portion of the growing season, the period of the year when the presence or absence of wetland hydrology indicators is most likely to reflect the true wetland/non-wetland status of the site.

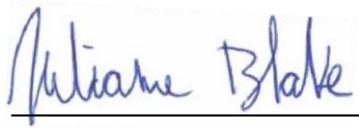
The City of Camas Critical Areas Ordinance states that all wetlands and recommended buffer zones within 300 feet of the project area shall be addressed in the critical area report (16.53.030(B)(2)). Wetlands and buffers on surrounding parcels have not been evaluated and included in the Critical Areas Report dated October 2, 2023 prepared by Ecological Land Services for this project. There are mapped wetlands and hydric soils on the parcel to the west and south of the project area.

An additional site visit was completed on April 2, 2024 to gather data during the normal wet portion of the growing season. The *Critical Areas Report for 13th Street Gas Station* completed by ELS in October 2023 was revised to include the findings from the April 2024 site visit. The site visit confirmed no wetlands were present onsite; however, one wetland (Wetland A) was observed offsite to the west that was not observed during the August 2023 site visit. Offsite boundaries for Wetland A were estimated by visual observations of changes in vegetation, the presence of surface water, and aerial photos; therefore, Wetland A boundaries are approximate. According to the *Washington State Wetland Rating System for Western Washington: 2014 Update* (Rating System), Wetland A is a Category III wetland scoring 7 points for water quality

functions, 7 points for hydrologic functions, and 4 points for habitat functions, for a total of 18 points. The designated buffer width for a Category III wetland with a high land use intensity and a habitat score of 4 is 80 feet, as listed in *Camas Municipal Code (CMC) Table 16.53.040-1*. For more information on critical areas onsite and within 300 feet of the project area, please see the *Critical Areas Report for 13th Street Gas Station - Revised* (ELS 2024).

If you have any further questions or need additional information, please contact me by phone at (360) 578-1371 or by email at Julianne@eco-land.com.

Sincerely,

A handwritten signature in blue ink that reads "Julianne Blake". The signature is written in a cursive style and is positioned above a thin horizontal line.

Julianne Blake
Biologist III