



Proposed Gas Station at NE 13th Street/NW Friberg-Strunk Street

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To Community Development Email <communitydevelopment@cityofcamas.us>

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Dear City of Camas Community Development Team,

I would like to strongly disagree with the assessment that a new gas station/convenience store/car wash on the corner of NE 13th Street and NW Friberg-Strunk Street will not have a significant negative impact on the surrounding area/residents. Below are my concerns.

According to the CARA map published on the City of Camas website, this proposed location is within one mile of two different Critical Aquifer Recharge Areas; the first is located at approximately NE 197th and NE 16th Street, the second Critical Aquifer Recharge Areas is approximately at NE Goodwin and NW Alexander Lane (at LaCamas Creek) is just downhill from the proposed site.

What assurance do we have that the catch basins for this business will be able to hold, process and filter spilt gasoline, dripping oil from idling engines, runoff car wash chemicals and stormwater effectively before being released into an open ditch that is up hill from, and will feed into the CARA located at NE Goodwin and NW Alexander Lane? What ongoing independent or state testing of groundwater will be done to ensure this business is properly disposing of its runoff water?

There are numerous hazardous vapor compounds released from fueling and underground gasoline storage tank vents. One of which is Benzene. According to the World Health Organization Guidelines for Indoor Air Quality, "there is no safe level of Benzene." According to a 2019 ScienceDirect study, emissions from gasoline storage tanks constitute a health risk up to 524 ft away, in all directions. The risk of cancer linked to Benzene has caused the California Air Resource Board to recommend that schools, daycares and other sensitive land uses (i.e. homes) should not be within 300 ft of gasoline storage tanks. What measures have been outlined to protect neighbors within 300 ft? And do these measures meet the highest industry standards of reducing air born pollutants from reaching homes nearby?

The additional chemicals from the car wash make this site even more hazardous. According to a recent University of Washington study, car washes that use cleaning agents containing hydrofluoric acid should train staff in proper handling. The study sites over 48 Labor & Industry claims, and even one death due to exposure. The study also states that even in small amounts, hydrofluoric acid is "insidiously toxic". What measures will be taken to protect workers and the public at large from chemical exposure at this car wash by the business and by the City of Camas?

There is also a risk of having a car wash next to a gas station. The risk of gasoline and other chemicals accidentally mixing should be considered. If the ethanol from gasoline were to mix with the hydrofluoric acid from commercial car wash mixtures, it would result in ethyl chloride. According to the National Institute for Occupational Safety and Health (NIOSH), ethyl chloride has an Immediately Dangerous to Life or Health air concentration value (IDLH) of 3.8%. Ethyl chloride is also extremely flammable in both liquid and gas form and is considered a federal air pollutant. What measures will be taken to prevent the accidental mixing of gasoline and other chemicals? How will the business, the Vancouver and Camas Fire Departments, and the City of Camas, respond when HazMat accidents and spills do happen?

A gas station on NE 13th St and NW Friberg-Strunk, will put extreme and permanent undue financial burdens on homeowners nearby. Homes directly in this area are on well water. When a home with a well is going up for sale, and that home that is located within one-quarter mile of a gas station, the homeowner must obtain an independent inspection of the well system as part of the appraisal process (as stated in the FHA Single Housing Policy Handbook for Appraiser and Property Requirements). Moreover, according to the property development and data research company, Locate Alpha, homes located near gas stations sell for 30-50% less than homes located one mile or more away. So, in addition to needing special inspections of well water systems, this gas station will directly affect property values. What measures will be taken to offset these financial burdens for nearby neighbors by the business, and by the City of Camas?

As stated in the SEPA Checklist for this proposed gas station, it is estimated to generate 2,281 new vehicular trips per day. What market research has been done to support these numbers? If this site does not get the daily business on the high end of these estimates, what assurance do we have this building won't be boarded up and a blight on the neighborhood in a few years?

If this business does generate the very high estimate of over 2,000 trips per day, what measures have been outlined by the business and by the City of Camas, that the 13th Street and NW Friberg-Strunk intersection and roads can support that much traffic? Has the business proposed additional traffic signals to handle the numerous left turns that drivers will seek to make onto 13th Street? Or does the business propose that over 2,000 drivers make a right hand turn and use NW Friberg-Strunk instead? And if so, has the business reached out to, and gotten the approval of the Evergreen School District? Union High School will be at a higher risk of traffic incidents with over 2,000 more vehicles driving past each day. Has the business expressed to the Camas Police Department that everyday there will be delivery trucks using multiple lanes of traffic (gas tankers, general merchandise, food, alcohol, cleaning supplies, LTL freight, etc.)? How does the business intend to keep trucks entering, and backing up from oncoming traffic not an interference with a very busy intersection, a blind uphill curve from west-bound traffic on Goodwin Road, and the normal traffic of new high school aged drivers?

Busy convenience stores come with many risks. According to FBI 2020 Crime Data, convenience stores account for 3% of all violent crime in the US. Additionally, convenience stores make up 10% of robbery locations, while gas stations make up 5%. What measures is the business taking to curb the threat of crime at this location? Will the business employ armed security guards? Does the business intend to use cameras inside and outside of the building? Does this business have a crime prevention plan involving the Camas Police Department and the Vancouver Police Department?

As stated in the SEPA Checklist for this proposed gas station, this site is part of the Pacific Flyway for migratory waterfowl. Light pollution affects millions of birds every year. With a new tall commercial warehouse next door, the light pollution from the lights of this gas station could attract and confuse waterfowl. As waterfowl migration happens primarily at night, what measures will the business take to ensure canopy lights and outdoor building lights will be off after sunset? Has the business sought the help and consultation of the Department of Wildlife? With fewer and fewer areas for birds to safely land, how will the gas station balance building on 80% of the land and the needs of the birds on the Pacific Flyway?

Thank you for taking my questions about this proposed gas station/convenience store/car wash on the corner of NE 13th Street and NW Friberg-Strunk Street. I look forward to your timely responses.

Lastly, as a resident of Camas for most of my life, I will end this email with my opinion; Camas needs more green spaces, not gas stations. This land should be protected and used for good, not for the profit of big oil at the cost of our neighborhood and the environment. I grew up here. My bus stop was at this intersection, and it pains me to see the development that has happened here already. It's certainly not lost to me that businesses and cities must grow, and that land has been getting repurposed for generations, but what are you planning to leave untouched for my generation? For the generations below me? Let's keep Camas greener than its neighbors, let's keep our wildlife safe and let's protect the water we all rely on.

Sincerely,

Elisabeth R. Rickard