

Community Development Office, City of Camas

(communitydevelopment@cityofcamas.us)

Regarding: Appeal of Proposed Project 13th Street in Camas (Clark County Tax Parcel 176148000, SPRV23-06)

From: *M. Kristin Price (Evergreen Tract Acres, Camas WA.) 12/4/2024*

In anticipation of the public hearing on December 12, 2024, I am submitting additional written comments as an appellant to the proposed project. My comments relate to items as listed on the SEPA Environmental Checklist.

Item B-2. Air. The SEPA submission and associated documents fail to provide specific data related to long-term emissions on site. The SEPA submission and associated documents do not provide data related to environmental risks and do not address fully the potential for increased fire risk.

Item B - 3. The SEPA submission does not address preservation of the aquifer for this residential area and for the environmentally sensitive areas within Lacamas Prairie and Lacamas Creek. As an owner of a nearby property on 13th Street with a tagged well, I am concerned about the risk involved in installation of underground storage tanks with potential for leakage.

> The SEPA submission fails to provide complete and accurate responses specific to the proposed car wash within the facility (SEPA submission, B - Environmental Elements).

B - Environmental Elements, Noise. The SEPA submission does not provide adequate response regarding hours of operation and any proposed measures to reduce or controlling noise impacts.

B- 4 - Plants. The SEPA submission does not provide adequate description of landscaping elements to preserve the natural habitat.

B - Environmental Elements, lighting. The proposal is not responsive in terms of hours of operation and mitigation of light and glare.

7. Environmental Health

'Are there any environmental health hazards, including exposure to toxic chemicals, risk of fire and explosion, spill, or hazardous waste, that could occur as a result of this proposal? If so, describe.'

Although possible risk of spills and flammable materials is acknowledged, the project does not address environmental health hazards - specifically health risks to residents in nearby neighborhoods.

B - 12 - Recreation. The proposal does not address disruption of recreational activities. The area is currently used for walking, cycling and running as it has been a safe route for transit. The quality of life for residents would be significantly impacted by the loss of this resource and safety risks for individuals engaged in recreational activities.

Item 14 - TRANSPORTATION

SEPA item: *Will the proposal require any new or improvements to existing roads, streets, pedestrian, bicycle or state transportation facilities, not including driveways? If so, generally describe (indicate whether public or private).*

The developer does not adequately describe modifications to assure that the intersection provides safe transit for pedestrians, bicyclists and safe passage for children crossing the street. The proposed project increases risks for drivers, pedestrians and bicyclists. Notably the design directs a bicycle route through traffic at the entry/exit point for the project. The project does not acknowledge impact for scheduled school bus routes with nearby school bus stops on 13th Street.

References:

In 2022, the Washington State Legislature added a Complete Streets requirement in [RCW 47.04.035](#). This directs WSDOT that “in order to improve the safety, mobility and accessibility of state highways, it is the intent of the Legislature that the department must incorporate the principles of complete streets with facilities that provide street access with all users in mind, including pedestrians, bicyclists and public transportation users” and “integrate the state route into the local network” for “state transportation projects starting design on or after July 1, 2022 and that are \$500,000 or more.”

<https://wsdot.wa.gov/construction-planning/complete-streets>

Complete Streets means planning, designing, building, operating and maintaining the transportation system that enables comfortable and convenient access to destinations for all people, and includes specific requirements for the pedestrian, bicyclist and transit rider experience. It is an approach to making our transportation system work for all of us, strengthening communities, expanding options for non-drivers, and making travel more predictable for everyone. Planning and designing Complete Streets projects uses a set of tools or treatments with a focus on the pedestrian and bicyclist [level of traffic stress](#), connectivity, route directness and [a safe system approach](#).

H. SEPA checklist: *'Proposed measures to reduce or control transportation impacts'*

No measures to reduce, control or manage transportation impacts are listed.

The project design is atypical. All other gas stations surveyed in the Camas area include separate entry and exit. The current design combines entry/exit on a busy street and impermissibly close to the intersection. In the event of a collision at the entry, vehicles would be trapped within the project site. In the event of an emergency on-site, ambulance and fire response would encounter untenable delays to access the facility.

Access to the gas station would invite the practice of U-Turns (using residential driveways) for vehicles heading west on 13th Street and turning to access the gas station. This turn-around practice is a current hazard during delays in traffic on 13th Street. (In May 2024, a driver attempting a U-turn on 13th Street to return to the intersection and crashed into a school bus with children aboard.) The proposed left-hand turn lane will not be effective: if vehicles are queued for a left-hand turn lane, drivers will inevitably attempt turn-arounds on 13th Street to access the station. (Please see NHTSA crash data reference in addendum)

Requested Hearing Outcomes

Require detailed response related to environmental impacts - impact on ground water and air and health risks associated with a gas station at this site. Consider relocation of storage tanks further away from residential areas and well sites.

Require responses to all SEPA interrogatories specifically pertaining to the inclusion of the carwash facility on the proposed project.

Require an updated and accurate traffic study, in accordance with Camas City requirements

Require project design to include separate ingress/egress from the facility. Recommend elimination of the proposed left-hand turn lane from 13th Street as it disrupts an existing right turn lane at the intersection. Require project to adhere to guidelines for proximity to the intersection; no exception should be granted..

Require detailed description of traffic flow - including entry/exit of service trucks during working hours, management of vehicles in queue and estimates of traffic flow for each enterprise within the facility (store, carwash and service station). Proposal should address traffic flow during peak when Union High school buses travel through this intersection.

Require design to provide safety for pedestrians and bicyclists, including provisions for street crossings and sidewalks and an extended sidewalk on the north side of 13th Street to provide access for pedestrians.

Require preservation of the White Oak on site and/or providing mitigation within the community where the project is located. Require detail on plans for including vegetation at the project site.

Require retaining structure to the west of the property to limit noise/light impacts to adjacent residential area.

Require specific plan for decommissioning if use of project site changes.

Recommend that developer consider alternative plans for development at this location.

Provide for additional public comment period after changes or revisions in the project plan are submitted.

Additional Reference Material pertaining to Item 14, Transportation.

Data from the National Highway Traffic Safety Administration (NHTSA) reveals that improper U-turns were the critical pre-crash event in around 14% of the road traffic accidents in the United States. Almost half a million accidents in the United States each year are caused by left turns at intersections. This makes left turns one of the leading causes of car accidents.

About 22% of all car accidents involve a left-turning vehicle. Approximately, 22% of all car accidents involve a left-turning vehicle and 53% of all cross-path accidents are the result of left turns. According to the U.S. Federal Highway Administration, about 50% of all motor vehicle accidents involving injuries and fatalities occur at or near intersections.