

To: City of Camas, Washington
Date: 11/12/2024

13th Street Gas Station Project Hearing Appeal Letter (Apeal24-1001)

The primary issue that we and our neighbors are extremely concerned about is groundwater quality.

- There are forty plus homes within ½ mile of the proposed 13th Street Gas Station that rely on private household drinking water wells.
- Some of these household wells are less than six hundred feet from the proposed gasoline storage tanks.

Even with all the safety features of the underground storage tanks and the monitoring equipment, the system could fail due to:

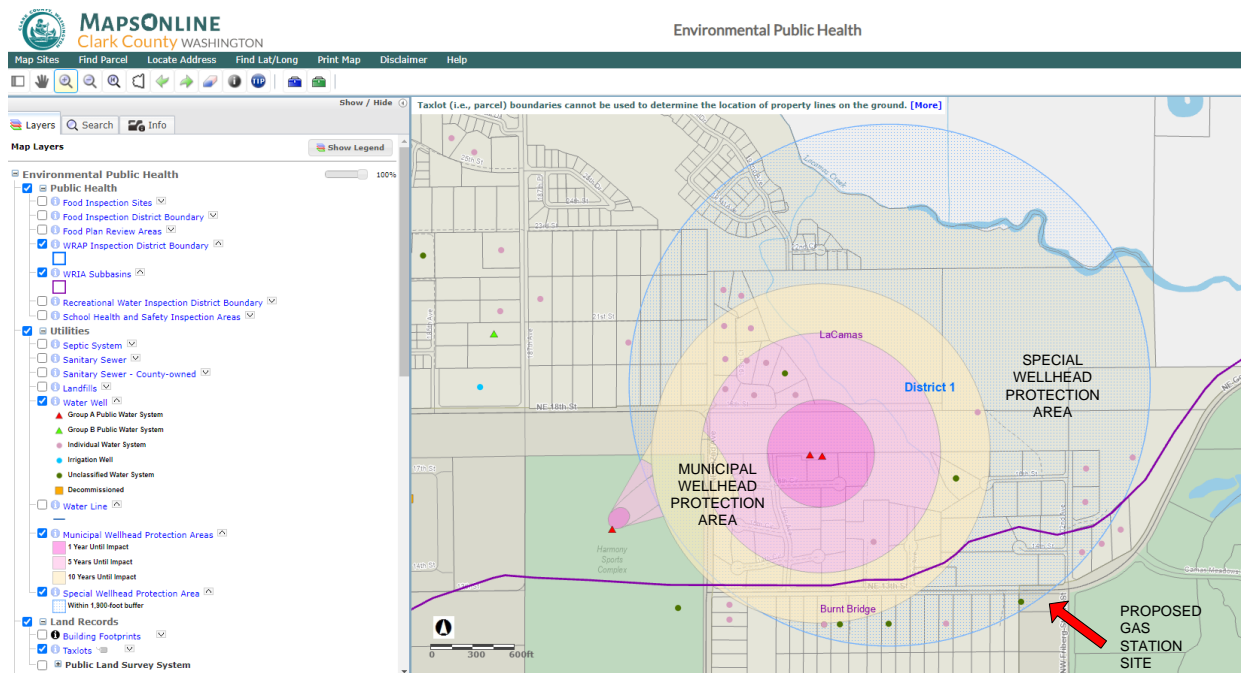
- Faulty installation or basic materials failure.
- A malfunction of the monitoring equipment's, electronics, or electro-mechanical systems
- Being compromised due to an accident, fire, or an earthquake

If there were a major spill:

- The household wells of forty plus homes could be contaminated
- Clean-up of an underground spill would be extremely complicated and difficult to correct
- Litigation involved for the clean-up would cause a major economic impact

The proposed gas station is in a Special Wellhead Protection Area within the 1900-foot buffer as shown in the following Clark County Environmental Public Health map:

- Located at: (<https://gis.clark.wa.gov/maponline/?site=EnvPublicHealth&ext=1>)



The site for the gas station is designated as a Category 2 Recharge Area. (CARA). According to Camas Code gas stations and underground storage tanks are prohibited in a critical aquifer recharge area.

- Camas, Washington - Code of Ordinances, Title 16 - Environment, Critical Areas, Chapter 16.55 – Critical Aquifer Recharge Areas. Version: Nov. 5, 2024,
 - 16.55.080 - Uses prohibited from critical aquifer recharge areas
 - F. Fuel and/or gas stations.
 - I. Other.
 - 4. Underground storage tanks for the use and storage of hazardous substances or hazardous materials.
- According to Washington State Department of Ecology:
 - The goal of establishing critical aquifer recharge areas (CARA) is to protect a community's drinking water by preventing pollution and maintaining supply. Washington residents get at least 60 percent of their drinking water from groundwater.
 - Washington State Category 2 Critical Aquifer Recharge Areas Zones
 - Highly permeable soils (Group A hydrologic soils)
 - That are separated from the underlying aquifers by an impermeable layer
 - Areas with high concentration of potable water supply wells

These Category II Critical Aquifer Recharge Areas are characterized by their potential to recharge aquifers used for potable water supply and are vulnerable to contamination based on the type of land use activity.

- References:
 - (<https://ecology.wa.gov/Water-Shorelines/Water-quality/Groundwater/Protecting-aquifers/Critical-aquifer-recharge-areas>)

Also noted on the Clark Co. website:

- In a Category 2 Recharge Area Gasoline Stations & above and below ground storage tanks (tanks and pipes used to contain an accumulation of regulation substances (see Section 40.100.070) are not prohibited but required to implement Best Management Practices (BMP), and need a CARA Permit.

A secondary major issue for nearby homeowners will be that when selling their home, the FHA single Housing Policy Handbook for Appraisers and Property Requirements states that if you have a drinking water well that is within ¼ mile of a gas station:

- When you sell your home, you will need to obtain an independent inspection of your well as part of the appraisal process.
- Property values will go down

Considering all the risk to the environment with all the potential problems of water quality, air quality, traffic safety, increased crime, and possible incurred litigations that can occur with the gas station, carwash, and store that is absolutely not needed; considering the many major retailers and multi-complex commercial centers that have been built and are currently being constructed less than one mile away.

- The bottom line is do not approve this project.

Richard and Joan Rickard

William and Ruth Small