

## Carey Certo

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**From:** Alan Peters  
**Sent:** Thursday, November 14, 2024 2:38 PM  
**To:** Carey Certo  
**Subject:** FW: Critical aquifer recharge areas map

Please add this to the record for APPEAL24-1001. Thank you.

### Alan Peters, AICP

Community Development Director

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**From:** Johnson, Deborah L (DOH) <[deborah.johnson@doh.wa.gov](mailto:deborah.johnson@doh.wa.gov)>  
**Sent:** Thursday, November 14, 2024 11:42 AM  
**To:** Alan Peters <[APeters@cityofcamas.us](mailto:APeters@cityofcamas.us)>  
**Cc:** Rob Charles <[RCharles@cityofcamas.us](mailto:RCharles@cityofcamas.us)>  
**Subject:** Critical aquifer recharge areas map

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Hello,

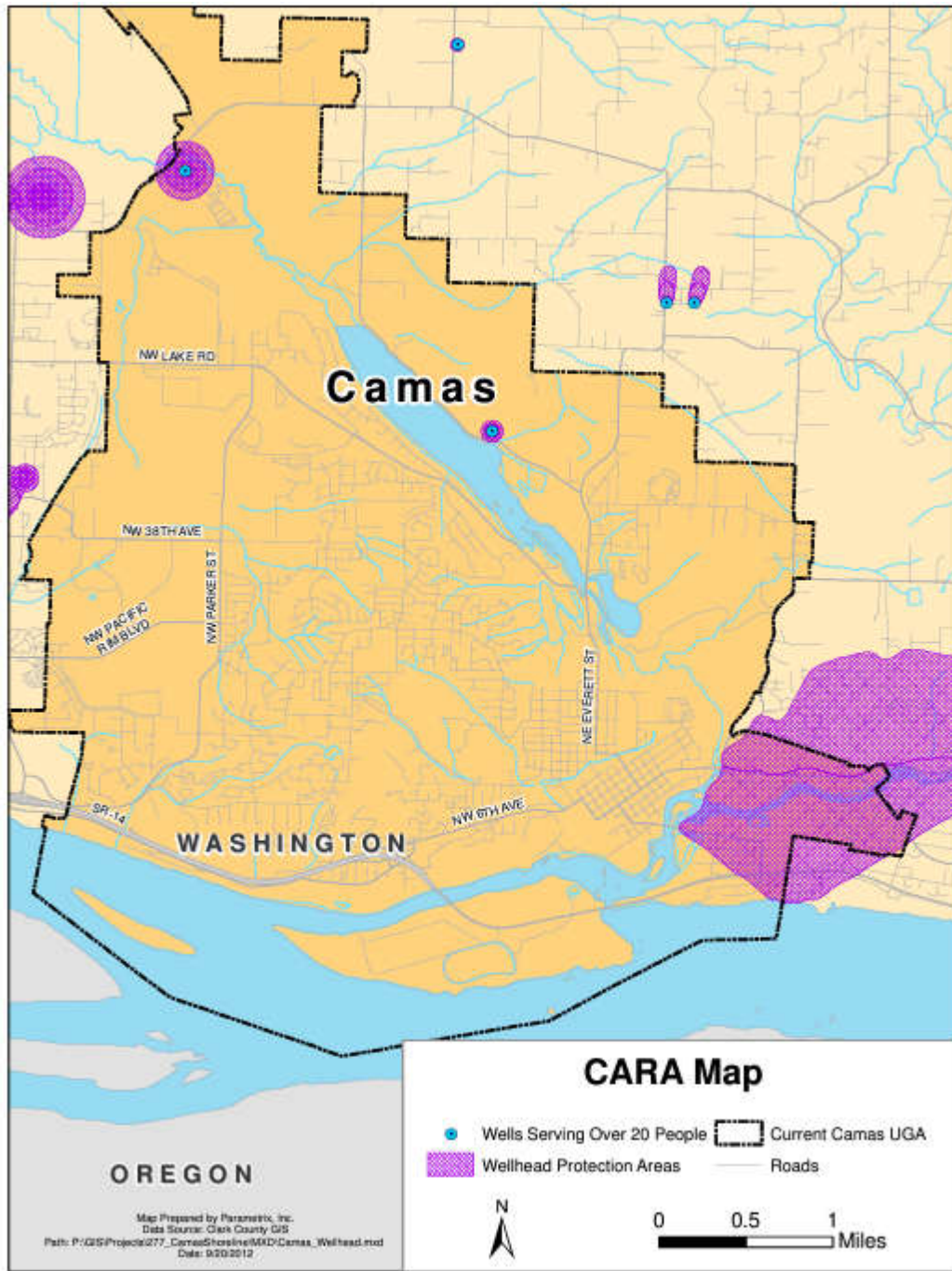
I had an inquiry relating to a City of Camas project that brought my attention to your critical areas requirements &, by extension, mapping.

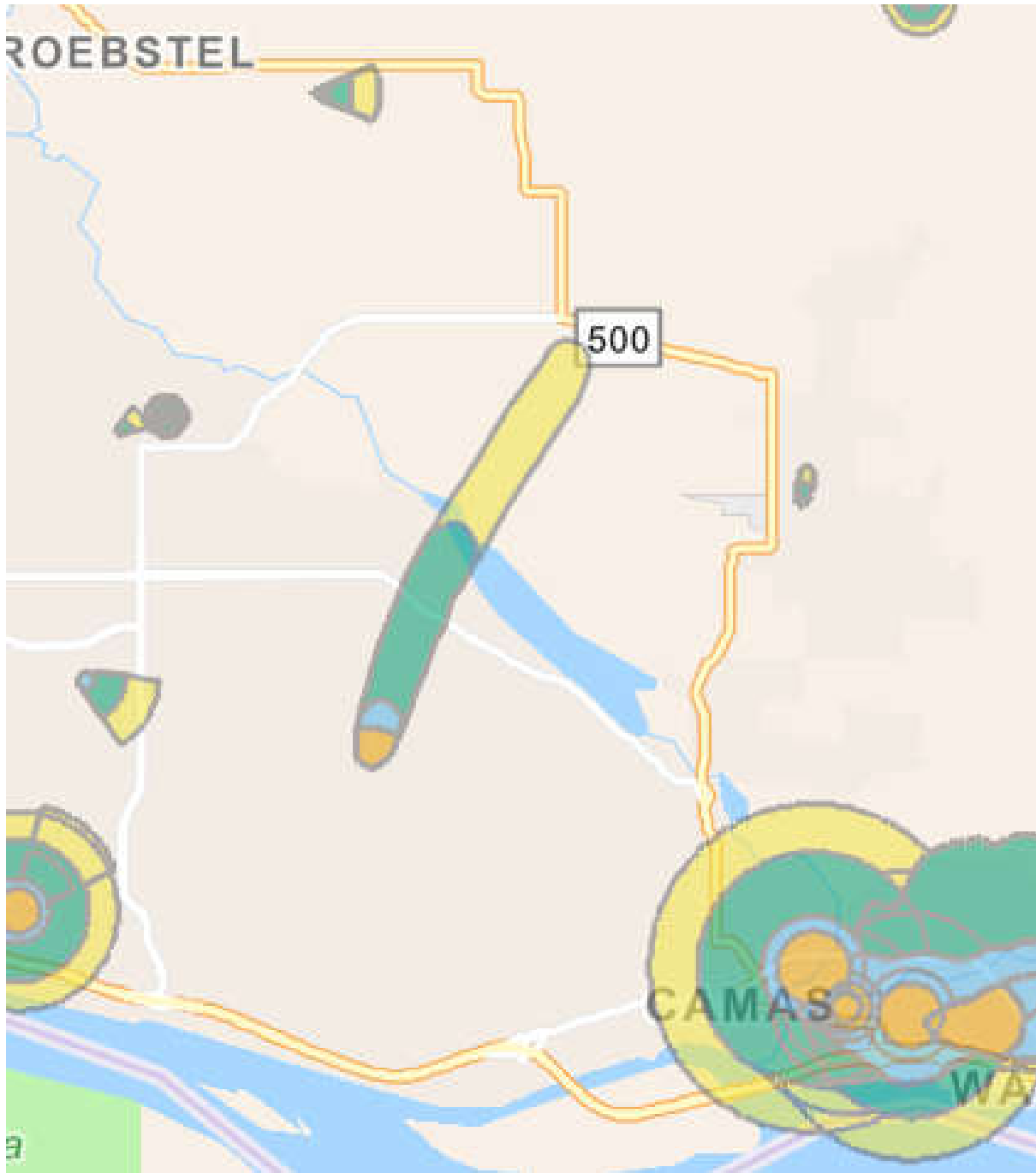
It appears the City is, if not actually using [this map](#) for determining its CARAs, at least putting it out there as the City's official CARAs map on [this webpage](#).

I note the map is dated 2012. Meanwhile, the City's wellhead protection areas, recognized as designated CARAs under CMC 16.55.010.A, today cover a much greater area according to our [SWAP map](#). (Plus, this would include anyone else's WHPAs that overlay your corporate limits, ex. Washougal.) The two are shown below for comparison.

In addition, the City's critical areas ordinance designates sole source aquifers as CARAs. A considerable portion of the city is overlain by the EPA-designated Troutdale Aquifer System Source Area SSA. See 3<sup>rd</sup> image below & [EPA's SSA map](#). Between that & the WHPAs, this places the majority of the city into the CARAs designation.

(scroll down- continued below screen clips)







CMC 16.55.030.A refers to the “adopted critical area maps” but noting this section dates to 2008, am not sure how that aligns with the 2012 map. But CMC 16.55.030.B clarifies that the “maps are to be used as a guide...and may be continuously updated... They are a reference and do not provide a final critical area designation.” This approach is in keeping with Commerce guidance & GMA statute, rule, & case law.

It would be optimal to rework the CARAs map you are displaying on your website to incorporate both WHPAs & the SSA limits, plus any of the other features listed in CMC 16.55.010 that are known. If the City lacks the ability to produce a new map, then it might want to remove the 2012 map from its website since it is outdated, & perhaps replace it with links to the SWAP & SSA maps.

Thank you for your consideration. I am also cc'ing Rob Charles, as he's working with us on a grant to model Camas' WHPAs which will ultimately affect the mapped boundaries too.

### **Deborah Johnson**

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 Environmental Public Health Division  
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