



**Fwd: SEPA Comments- Gas Station (SEPA23-12)**

From Russell Wegner <russwegner@mac.com>

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To Community Development Email <communitydevelopment@cityofcamas.us>

Cc CARLO (DNR) ABBRUZZESE <puffbird10@gmail.com>

📎 1 attachments (12 MB)

Wetland.2.pdf;

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**Russell & Barbara Wegner**

**19910 NE 16th St.**

**Camas, WA 98607**

Attn: City of Camas, SEPA Official

Community Development Department

616 NE Fourth Avenue

Camas, Washington 98607

Please confirm receipt.

SEPA Comments: We feel the SEPA is flawed and the project should not move forward

Please see the following:

The SEPA does not address many important issues:

1. **Water Flow and Runoff** (including storm water as well as the method of collection and disposal This is not mentioned in the SEPA) Where will this water flow?
2. **Project Violaton of Camas Municipal Code 16.55.080** - States "Uses prohibited from critical acquifer recharge areas Item F, Fuel and/ or Gas Stations."

Surface spills during the rainy season will mix with storm water which would then be discharged with drainage leads to Lacamas Creek/Lacamas Lake, and Lacamas Prairie as well as towards the west and it's wetland/standing water and aquifers.

Approximately 18 wells are adjacent to this gas station project. Wetlands and aquifer adjacent to property which are 17 feet from project property line are also affected

( see photos 2/11/24).

The SEPA does not address the protection and impact on the aquifers, Lacamas Creek, Lacamas Lake, Lacamas Prairie, Wetlands (17 ft from property line, see attached photo) and the wells. Clearly 14.04 of Municipal Code has not been addressed as part of the SEPA. Mitigation issues of developer neighboring projects is also not cited.

**14.04.020 Applicability** The SEPA and overall project needs to be reviewed with Camas 14.04 in mind

The provisions of this chapter shall apply to all new and existing development, public and private. The provisions of this chapter shall also apply to the maintenance responsibility of existing stormwater facilities.

1. Meeting the requirements of this chapter is the joint and severable responsibility of the owner(s) of the site and the person(s) responsible for maintenance on both new and existing facilities.
2. The responsible city official is authorized to enforce the provisions of this chapter.
3. The city recognizes that the implementation of successful pollution control practices is most likely through a pollution prevention education effort for institution sites, commercial sites, industrial sites and the general public. The city will endeavor to provide education and technical assistance within the constraints of available resources to show individuals how to implement pollution control practices.

For the purpose of this chapter the following shall apply:

"AKART" — All known, available, and reasonable methods of prevention, control, and Treatment. See also the State Water Pollution Control Act, sections 90.48.010 RCW and 90.48.520 RCW.

"Best management practices (BMPs)" — Those physical, structural and managerial practices, and prohibitions of practices, that, when used singly or in combination, control stormwater runoff peak flow rates and volumes and prevent or reduce pollution of surface water or groundwater.

**Special Note: Carwashes commonly use hydrofluoric acid** and this has not been addressed. The review of 14.04 needs to occur by City of Camas.

#### **14.04.060 Prohibited discharges.**

No person shall throw, drain, or otherwise discharge, cause or allow others under its control to throw, drain, or otherwise discharge into the municipal storm drain system and/or surface and ground waters, and materials other than stormwater.

- A. Examples of prohibited discharges include, but are not limited to, the following:
1. Trash or debris.
  2. Construction materials.
  3. Petroleum products, including but not limited to, oil, gasoline, grease, fuel oil, and heating oil.
  4. Antifreeze and other automotive products.
  5. Metals in either particulate or dissolved form.
  6. Flammable or explosive materials.
  7. Radioactive material.
  8. Batteries.
  9. **Acids**, alkalis, or bases.
  10. Paints, stains, resins, lacquers, or varnishes.
  11. **Degreasers and/or solvents.**
  12. Drain cleaners.
  13. Pesticides, herbicides, or fertilizers.
  14. **Steam cleaning wastes.**
  15. **Soaps, detergents, or ammonia.**
  16. Swimming pool or spa filter backwash.

17. **Chlorine, bromine, or other disinfectants.**
18. **Heated water.**
19. Domestic animal wastes.
20. Sewage.
21. Recreational vehicle waste.
22. Animal carcasses.
23. Food wastes.
24. Bark and other fibrous materials.
25. Lawn clippings, leaves, or branches.
26. Silt, sediment, concrete, cement or gravel.
27. Dyes.
28. **Chemicals not normally found in uncontaminated water.**
29. **Any other process-associated discharge except as otherwise allowed in this section.**
30. **Any hazardous material or waste not listed above.**

- Posting of a maintenance assurance pursuant to subsection J of this section.

4. Duration. Wetland permit preliminary approval shall be valid for a period of three years from the date of issuance or termination of administrative appeals or court challenges, whichever occurs later, unless:
  - a. A longer period is specified in the permit; or
  - b. The applicant demonstrates good cause to the responsible official's satisfaction for an extension not to exceed an additional one year.

I. Wetland Permit—Final Approval.

1. Issuance. The responsible official shall issue final approval of the wetland permit authorizing commencement of the activity permitted thereby upon:
  - a. Submittal and approval of a final mitigation plan pursuant to subsection (E) (3) of this section;
  - b. Installation and approval of field markings as required by Section 16.53.040(C)(2);
  - c. The recording of a conservation covenant as required by Section 16.53.040(C)(3) and included on the plat, short plat, or site plan as required by Section 16.53.040(C)(4);

- d. The posting of a performance assurance as required by subsection (H)(3) of this section.

**Property owner at 2005 NE 13<sup>th</sup> Street experienced new sewage and drainage problems** - A recent sewage backup from new Camas Sewers created a pollution issue in front of residence home on 202nd and 14th. Camas took no action to protect the pollutants into the storm water pond. Camas needs to be proactive in planning process to prevent future problems as required by involved and work with county and Dept of Ecology on this, yet it was ignored. Camas must take proactive and active with SEPA as defined in 14.4.

In order to meet the Federal Clean Water Act and DOE's requirements to protect the environment, the city has adopted regulations for identifying what is allowed and what is prohibited for discharging into waters of the state. Camas needs to ensure this is followed.

The Geotechnical Study is inaccurate. Multiple tests at multiple dates/ seasons would provide the required information to understand the soil, water, and site issues. Adjacent Wetlands are not identified. Aquifers and nearby wells on 13<sup>th</sup> street (multiple) are also not sited in the report. The aquifer and wetlands are approximately 17 feet away from the property line. Please see attached photos.

The elevation that the gas station would be is such that any runoff and drainage from the pollutants from the property would directly impact the following: Wells, Acquifers, Wetlands, Lacamas Prairie, Lacamas Creek and Lacamas Lake.

### **Air Quality**

Regarding air quality, the SEPA does not address

- a. The proposal will affect current land uses on nearby or adjacent properties.**

#### **Other Camas Code Issues that need to be addressed with SEPA**

- Surrounded by quiet residential properties
- It will disturb and interfere with the peace, comfort and repose of owners or possessors of neighboring and nearby real property

- Section 18.01.020 of the Camas Municipal code A. (attachment F) states
- The purposes of this title are: to implement the comprehensive plan for the city; to encourage the most appropriate use of land; to conserve and stabilize the value of property; to aid in rendering of fire and police protection; to provide adequate open space for light and air; to lessen the congestion on streets; to give an orderly growth to the city; to prevent undue concentration of population; to improve the city's appearance; to facilitate adequate provisions for community utilities and facilities such as water, sewerage, and electrical distribution system, transportation, schools, parks, and other public requirements; and in general to promote public health, safety and general welfare.
- Since the public health, safety and general welfare is superior to the interests and pecuniary gains of the individual, this title may limit the use of property and prevent its most profitable gain. If some reasonable use of property is allowed by this title and the effect is not confiscatory, the city is exercising a proper use of police power.
- (Ord. 2515 § 1 (Exh. A (part)), 2008: Ord. 2443 § 3 (Exh. A (part)), 2006)
- The externalities from this project will destabilize property values of all neighbors, which **Per Camas Municipal code 9.20.020 - Public consumption**. Except as permitted by RCW Chapter 66, no person shall open the package containing liquor or consume liquor in a public place within the limits of the city. This is problematic because the customers of the development may then move to our neighborhoods located across the street in Clark County to consume their purchases, here.
- The FHA Single Family Housing Policy Handbook for Appraiser and Property Requirements for Title II Forward and Reverse Mortgages states ...that properties within one quarter mile of a gas station will need to conduct an independent inspection of their wells ('for the appraisal'). This requirement is an additional burden as result of a gas station next to all the homes on NE 13<sup>th</sup> Street and in Morning Meadows Estates and Katie's Hill neighborhoods with drinking water wells (more than 27 homes).

**Air Issues****a. Emissions**

- **Vacuums from car wash operation/customers vacuuming releasing particles.**
- **Vapor leaks of gasoline during customer filling and tanker truck filling of underground storage tank (UST)**
- **Exhaust fumes from cars waiting, idling, from trucks idling, even more from diesel powered engines on cars and trucks, exhaust fumes from tanker trucks**
- **Exhaust fumes and odors from 100's of additional trips of cars and trucks to the site**

**Traffic Impact**

The Traffic Impact study and does not reflect environmental impacts and does not address seasonal issues, school traffic issues, sidewalks, as well as other construction modifications and environmental impacts for necessary infrastructure modifications and impacts. For example, Traffic Impact Study did not capture Union High School release times which is a high traffic time and dangerous time due to bumper to bumper congestion and inexperienced drivers. The impacts of vendor services to and from the gas station and car wash are also not addressed in the Traffic Impact Study, particularly fuel trucks.

The impact of this type of development and special requirements from Dept of Ecology and City of Camas are also not identified.

**Environmental Noise Issues**

- - **Horns if there is congestion, which is likely given how the entry/exit is designed**
  - **Tanker truck delivery process**
  - **Customers' loud voices**
  - **Regarding, Section 9.32.050 Public disturbance noises. of the Camas Municipal Code, 4. The creation of frequent, repetitive or continuous**

sounds in connection with the starting, operation, repair, rebuilding or testing of any motor vehicle, motorcycle, off-road vehicle, or internal combustion engine so as to unreasonably disturb or interfere with the peace, comfort and repose of owners or possessors of neighboring or nearby real property, provided, however, that this subsection shall not apply to the operation of lawn mowers, garden tools, chain saws or other power equipment used for building repair or grounds maintenance between the hours of 7 a.m. and 10 p.m.

I see these problems coming from this project:

- car wash: swooshing, blowing, loud noises
- customers: music, especially in warmer months
- idling cars
- motor cycle and diesel truck engine noises
- starting of motor vehicles
- braking noise from motor vehicles

### **Animals observed on site- not addressed in SEPA**

The project would disrupt the habitat for the following:

Deer

Eagles

Owls

Squirrels

Hawks

Coyotes

Raccoons

### **Lacamas Prairie Issues**

The gas station project will impact this sacred area which includes the largest Camas Lily Field in the County (Camas is named for) Please see below from DNR.



Department of  
Natural Resources Lacamas  
Prairie NAP/NRCA  
**Natural Areas Category Evaluation Criteria Responses RCO**  
**Project #20-1334**

**Introduction:** This project aims to protect priority wet prairie and Oregon white oak plant communities that contain Bradshaw's lomatium, listed as Endangered under the federal Endangered Species Act, seven other rare plants and one bird of conservation concern. Funding for this project is vital to prevent development of these private parcels, which are located just east of Vancouver, in Clark County, one of the most rapidly developing counties in the state.

## 1. Ecological and Biological Characteristics

**Bigger Picture-** Located within the Puget Trough/Willamette Valley ecoregion, **this site represents the best and only known remnant of the Willamette Valley wet prairie ecosystem in Washington, including one of only 20 remaining sites and the largest of four known population centers for Bradshaw's lomatium, a globally rare and federally endangered plant species. The prairie remnant occurs in a native valley landscape mosaic with Oregon white oak woodland and Oregon ash wetland forest. Conservation targets at the site include the following elements that have been identified as priorities for protection in The State of Washington Natural Heritage Plan (2018):**

Oregon white oak/Oregon ash / snowberry forest--Priority 1	Oregon coyote-thistle--
Priority 2 Willamette Valley wetprairie--Priority 1	Dense sedge--Priority 3
Bradshaw's lomatium--Priority 1	Nuttall's quillwort--Priority 3
Slender-billed Nuthatch--Priority 1	Small-flowered trillium--Priority 3
Tall beardtongue—Priority 1	Calif. compass plant--Priority 3
Hall's aster--Priority 2	

This site was approved by the Commissioner of Public Lands in 2007 as a combined natural area preserve (NAP) and natural resources conservation area (NRCA). The sensitive prairie, rare plants and oak forest will be protected within a core NAP, while important watershed lands, waterfowl habitat, and oak/ash forest remnants are found within the NRCA portion.

The prairie and oak communities on this site have been identified by Partners in Flight and the American Bird Conservancy as a priority Bird Conservation Area (BCA). This site is also supported by the Draft Lacamas Meadows Site Conservation Plan written by the Washington Field Office of The Nature Conservancy in 1999. Restoration and management of this site are recognized as an important component of the U.S. Fish and Wildlife Service Bradshaw's lomatium (*Lomatium bradshawii*) Recovery Plan and the U.S. Fish and Wildlife Service Willamette Basin Recovery Plan. The Natural Heritage Advisory Council has approved the site as a Natural Area in 2006.

**Uniqueness and Significance-** This occurrence of Willamette Valley wet prairie is the last remaining example of its size and quality in Washington. Formerly extending over more than 1 million acres in the Willamette and Columbia Valleys, this native prairie type is now extremely rare, with less than 1% (2000 acres) remaining in fewer than 20 locations. Most of this lowland oak forest and prairie was lost in the early 1900s to agriculture and land development.

This site is part of a larger native landscape of lowland wet prairie, oak forest and ash riparian forest. Other protected lands within this lowland landscape include: Oregon ash riparian forest in Camp Curry (protected by a conservation easement held by the Columbia Land Trust), Lacamas Lake County Park, and a native prairie remnant on the Camas Meadows Conservation Agreement tracts. Adjacent private lands also have examples of the wet prairie and oak forest.

*Species or Communities-* The Oregon white oak – Oregon ash / snowberry forest at Lacamas Prairie is one of six high-quality examples out of less than 20 occurrences in the state. Most other sites are either smaller, more fragmented, or infested with exotic plants.

The population of Bradshaw's lomatium is the only known occurrence of this species in Washington and is believed to be the largest population of this species in the world. There are only 12 other known populations of this species throughout its range. It also is the only occurrence of the species within Recovery Area 5, as described in the USFWS Recovery Plan (1993) and Plan Amendment (1999) for Bradshaw's lomatium.

In 2014 a population of tall beardtongue was discovered at the site. This species was first recorded in 1934 and had not been seen since until it was rediscovered in Oregon in 2008. In Washington, this species is only known from Lacamas Prairie NA which has the largest known population in the world. There are only four other extant populations which are found southeast of Portland.

Thank you for your attention to this very important matter.

Sincerely,

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