

Comments to the SEPA revision of May 2, 2024 for the 13th Street Gasoline Station Project

B. 2.: Air: The revised SEPA does not address the following issues

- 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 from 2,281 of additional trips of cars and trucks to the site
- The City of Camas has permitted a large warehouse with 50+ truck bays, storing highly flammable batteries, which may simultaneously arrive and depart. The air pollution from this amount of exhaust fumes and exacerbated by another project with exhaust and vapor fumes is overwhelming and beyond excessive, given that it is surrounded by residences and a high school.
- Vacuums from car wash operation/customers vacuuming releasing particles.

3.: Water: a. Surface water

1) The revised SEPA does NOT acknowledge that there are 4 bodies of surface water

- Neighbor to the west at 20005 NE 13th Street has standing water most of the year (more about this later), 17' from the property line to the proposed development
- Neighbor to the north at 20107 NE 14th Street has a storm water pond that contains water most of the year (ours)
- * Neighbor, also to the north at 20009 NE 14th Street has a large green belt with wetland protection
- Commercially zoned parcel to the south at 7163 NW FRIBERG-STRUNK ST has a wetland immediately adjacent to the parcel, belongs to the same developer (only this one is mentioned in the revised SEPA)

2) Work would need to be performed within 200 feet of the surface water pond to the north, which drains toward Lacamas Creek

- See wetlands map
- Camas Municipal Code 16.55.080 F. prohibits Fuel and/or gas stations

6) Does the proposal involve any discharges of waste materials to surface waters? If so, describe the type of waste and anticipated volume of discharge.

- Surface spills during the rainy season may be carried away to the street and from there to the storm water pond and Lacamas Creek/Lacamas Lake below
- The car wash suds and grime-laden waste water (Hydrofluoric acid, waxes/petroleum products) will supposedly be treated by the “waste water treatment”. However,

afterwards it will be discharged to the ditch which will drain toward Lacamas Creek/Lacamas Lake

- What is the reliability of these waste water treatment systems, their capacity, inspection frequency, and ability to dissolve petroleum products and car wash chemicals?
- These waste waters may also discharge to the property to the west (that has wetlands/standing water) which may even seep to the aquifer below.
- Researchers at John Hopkins University have found that spillage of fuel releases an average of 40 gallons of gasoline annually at the pumps of a typical gas station. Furthermore they found that spilled gasoline can migrate through the concrete pads.

c. Water Runoff (including stormwater):

1) Describe the source of runoff (including storm water) and method of collection and disposal, if any (include quantities, if known). Where will this water flow? Will this water flow into other waters? If so, describe.

- Yes, this water will flow into other waters.
- When there is snow and ice melt it will cross the road and run toward the property at 20107 NE 14th Street and others.
- Surface spills during the rainy season will mix with storm water which would then be discharged into the nearby ditch which leads to Lacamas Creek/Lacamas Lake, toward the west and its wetland/standing water, the aquifer below.
- With 80% impervious surfaces, as proposed for the development and the types of sudden excessive rainfall we frequently experience, extremely harmful chemicals will be discharged from the parcel to neighboring residents. Onsite catch basins are designed to capture average rainfall, but will fail during sudden bursts of rain which will result in flooding, to the detriment of adjacent parcels and the stormwater pond across 13th Street.
- A geohydrolic study is needed

2) Could waste materials enter ground or surface waters? If so, generally describe.

The revised SEPA acknowledges that waste materials could enter ground or surface waters. They do not have a proposal for a remedy should this problem occur.

This is not an acceptable risk to have petroleum and other chemicals which are toxic to human health enter the area where adjacent neighbors get their drinking water through wells from an aquifer below.

Periodic testing of wells along 13th Street and special insurance coverage for cleanup of future problems of contaminated wells and drinking water and health-related issues need to be written into the design plan. The stormwater pond across the street should be tested periodically and a potential cleanup plan/funding needs to be put into place now. It should

not be the taxpayer's responsibility or the EPA to pay to clean the problems caused by gasoline contamination from a business.

3) The revised SEPA does not address the fact that the prior developments of Nex Generation have already affected the drainage pattern of the property at 20005 NE 13th Street, as we described in our previous comments.

There is a strong probability that this development would further aggravate a situation caused by the current development to the south (Nex Generation) of the projected project. It states that 80% of its surfaces are impervious. Water may continue to seep westward.

(Please see our previous submission below:

- The property owner at 20005 NE 13th Street experienced drainage problems and flooding onto this property, when the parcel of the current Lacamas Tech Center was initially leveled, a trench was dug in the western perimeter and wetlands were filled in. (To our knowledge the filling of the wetlands at that time was not properly managed by the City of Camas. The property owner complained and wrote to the City, with no avail.) However, water will continue to find its way and it has: In this case, consequential to activities on the neighboring commercial property it has created or enlarged a wetland at the property at 20005 NE 13th Street that is not yet on the original maps. This property is IMMEDIATELY adjacent to the proposed gas station, the new wetland is 17' from the east boundary of the proposed gas station and would very likely receive run-off.
- The current project would once again affect the drainage pattern to this property.

7. Environmental

4) **Describe special emergency services that might be required.**

- Added new storage of highly flammable batteries in a warehouse battery storage facility across the street from a gasoline fuel station is a HIGH RISK PROJECT, that the City of Camas may not be equipped to deal with in the case of an emergency. These adjacent uses are not compatible.
 - Police activity to deal with shoplifting, break-ins and robberies
 - Fire truck activity for fuel fires
 - Police activity to address unhoused people loitering and camping due to access to bathrooms and trash receptacles
 - Spill clean-up cannot be performed with 2 or 3 employees and a 4,000 sq. ft. convenience store. The employees will be pre-occupied tending to customers and

preventing shoplifting to care about performing a spill clean-up/overflow that is also dangerous to their health.

- Too few employees to monitor for spills/environmental hazards
- Spills caused by customers driving away with the nozzle still attached causing a large spill, which will need more manpower than 2 or 3 employees tending to other duties. (Costco has a dedicated employee tending their gas station [which is literally within walking distance])

b. Noise

1) What types and levels of noise would be created by or associated with the project on a short-term or a long-term basis (for example: traffic, construction, operation, other)? Indicate what hours noise would come from the site)?

The revised SEPA fails to acknowledge the increase in noise pollution.

- In the section Transportation f) it states that fueling tank trucks will be onsite during hours of 7 pm to 7 am, resulting in an unacceptable noise burden to residences during the night.

Please note the following real scenarios that will occur daily, hourly:

- car wash: swooshing, blowing, loud noises
- customers: music from cars when doors are opened, and/or windows rolled down
- idling cars
- motor cycle and diesel truck engine noises
- starting of motor vehicles and motorcycles
- braking noise from motor vehicles
- horns if there is congestion, which is likely given how the entry/exit is designed
- tanker truck delivery process
- customers' loud voices
- this violates 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.

2. The making of any loud or raucous sound within one thousand feet of any school, hospital, sanitarium, nursing or convalescent facility, which unreasonably interferes with the use of such facility, or with the peace, comfort or repose of persons therein.

- Union High School is 1,839 feet from the proposed property
- A chiropractic office is within 70 feet of the proposed property

Proposed measures to reduce or control noise impacts, if any:

- There are companies which prepare noise level reports. This report should be generated for a project with the equivalent scope.

8. Land and shoreline use

- a. **What is the current use of the site and adjacent properties? Will the proposal affect current land uses on nearby or adjacent properties? If so, describe.**

The revised SEPA fails to address how the proposal will affect current land uses.

It does not address how the developer will set aside funding for the owners of parcels within ¼ mile to pay for additional appraisals – see below.

The revised SEPA does not address the City of Camas's own Neighborhood Preservation Standards.

- 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
- The externalities from this project will destabilize property values of all neighbors (more than 27 homes) which is a violation of Camas City code:
- Section 18.01.020 of the Camas Municipal code states

A. 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.

B. 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)

- This next section shows how the land use of a gas station, car wash and convenience store next to residential properties violates the City of Camas' Neighborhood Preservation Ordinance:
 - **8.06.010 - General provisions.** This chapter shall be known as the "neighborhood preservation ordinance" of the city, may be cited as such, and will be referred to hereinafter as "this chapter." (Ord. 2193 § 1 (part), 1999)

8.06.020 - Purpose and scope.

A. The purpose of this chapter is to promote the health, safety and welfare of the citizens of Camas, Washington, and to protect neighborhoods against hazards, blighting, and deteriorating influences or conditions that have a negative impact on families; encourage social disorder and crime; and decrease area property values, by establishing minimum standards for the maintenance of all residential and nonresidential buildings and structures, and vacant and improved land.

B. This chapter shall apply to all buildings, structures and lands within the city regardless of the use, the date of construction, improvement or alteration.

C. This chapter shall be fairly, sensibly and reasonably applied to promote the maintenance of all existing buildings and land in the city. The intent is to ensure that individuals and families do not suffer undue hardship.

- In this section is also a definition of Public nuisance. Near residential land use, a gas station, car wash and convenience store fits the description of the a public nuisance. Please see below, as each item individually qualifies as a definition of a public nuisance, because they are separated by the word "or":
- "Public nuisance" means a thing, act, omission to act, occupation, or use of property which annoys, injures or endangers the safety, health, comfort, or repose of the public, offends public decency, is offensive to the senses, lawfully interferes with, obstructs, or renders dangerous any portion of the city, or in any way renders other persons insecure in life or use of property, or obstructs the free use of property so as to essentially interfere with the comfort and enjoyment of life and property.
- The "senses" above are sense of smell (vapors and diesel and gasoline exhaust fumes), soundnoise (engines starting, vacuums from car wash, car wash water spraying, spinning brushes, etc.), sight (lights and lighting and lack of dark sky after dark)
- The proposed Camas development will cause undue burden on the adjacent neighborhoods and the City will experience a strain to their 911 call system.
- **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 convenience store will make our neighborhoods and driveways targets for local loitering and consumption of items purchased. Trash is likely to be tossed into our neighborhood lawns, streets and Clark County public spaces.

The proposed development will create additional cost for adjacent well-owning properties within ¼ mile of the gas station, when they try to sell their property:

- 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’).
- Has the developer made provisions to set aside funding for these homeowners within these distances?
- This requirement is an additional burden and expense to all the homes on NE 13th Street and in Morning Meadows and Katie’s Hill neighborhoods that are on drinking water wells.
- https://www.hud.gov/sites/documents/SFH_POLI_APPR_PROP.PDF
- <https://www.hud.gov/sites/dfiles/OCHCO/documents/4000.1hsgh-080923.pdf> page 604

L) Proposed measures to ensure the proposal is compatible with existing and projected land uses and plans, if any.

- This project is incompatible in this location which consists of one-acre residences. It does not take into account that it surrounded by quiet residences and that this project would vault its collective problems onto them. This would be a complete “lose” situation for the pre-existing homes, and a “win” for the gasoline station. The project would gain from the appearance of the residential community and the residences would suffer from all the reasons no one wants to live near a gas station.

10. Aesthetics

- a. What views in the immediate vicinity would be altered or obstructed?**

- A 28' structure at a corner of an intersection would reduce sight distances. We already have everyone comment about the Great Wall of Camas when referring to how the City-approved set-back from the warehouse in the southeast corner of the intersection is too narrow, representing an eye-sore.
- Customers of convenience stores and gas stations will litter and leave trash on the adjacent side-walks, properties, undeveloped ditches and NE 13th Street and Friberg-Strunk Road.
- Will the City of Camas clean this, or because it is adjacent to Clark County, it will only be cleaned twice per year, never, or become the burden of the residents living in the homes surrounding the gas station?
- Our neighbors have been walking with trash bags for years collecting the trash littering this portion of Camas leading to our neighborhood. Camas has not been collecting the trash and we are concerned that the City will not send crews to collect roadside trash.
- Customers may decide to consume purchases from the convenience store (including but not limited to alcohol) in the nearby residential neighborhoods, causing disturbances and leaving trash behind.
- Will the developer help with Graffiti removal and replacement? This development could create foot traffic that never existed before that may target our fence.
- A monument sign at the corner would obstruct the view for drivers making a right turn. Building set-backs should not be deviated from for the same reason as not to violate Camas City Code:
- **18.15.080 - Signs prohibited.**
- The following signs are specifically prohibited in the city:

B.Signs located in such a manner so that by location, color, size, shape, nature would tend to obstruct the view or be confused with official traffic signage.

11. Light and glare

What type of light or glare will the proposal produce? What time of day would it mainly occur?

- The revised SEPA does not address the time of day that light or glare would be emitted.
- During what hours would light be emitted from the proposed project? It does not address any light emitted from signage.

- Can it be assumed that there will be no lighted signs?
- Will the business go completely dark, just like the surrounding residences to preserve dark sky and avoid light and colored light pollution, typical of gas station canopy/signage lighting?
 - Camas Municipal code 18.21.060 G.:
 - Lighting. Site and building lighting shall be designed to minimize glare or objectionable effects to the adjacent properties. Residential neighborhoods are of particular concern. Site-lighting poles shall not exceed twenty feet in height and shall direct the light downward. Lighting sources viewed from above or below on adjacent property shall be shielded. Building lighting is to be concealed and indirect. Lighting in service areas is to be contained to conceal visibility of light sources from street and adjacent property. Site lighting is to be designed to provide uniform distribution, and the light levels shall be adequate for reasonable security and safety on the premises.
 - Monument sign would create light pollution outside of the perimeter of the parcel
 - LED bright lighting of the interior of the convenience store will project onto the concrete surfaces and reflect to neighboring properties
 - LED lighting from the gas station canopy will reflect off the concrete surfaces.
 - The area is steeped in darkness, except at the intersection. Dark sky benefits to wildlife and humans (improved sleep) have been widely documented.

Could light or glare from the finished project be a safety hazard or interfere with views?

The revised SEPA does not address and even denies the impact created by the proposed development.

- Each vehicle exiting the parcel, which will be hundreds (2,000+) per day, will shine their headlights at the two residential homes on the other side of NE 13th Street (20107 NE 14th Street and 20009 NE 14th Street). Especially during darkness which is in the early morning and late afternoons for 50% of the year, this will create a strobe-light effect, shining light into these properties. (The existing trees located on these properties do not adequately shield this light created by the development's customers, nor should they have to, because it is the responsibility of the development to shield the neighboring properties from light.
- Extra tall walls/fence needs to be erected to shield against any light projected in the north direction by cars. Keep in mind that if there is a curb an exiting vehicle may project very high up, before entering the roadway

- Each vehicle entering the parcel making a left turn will shine their headlights at the residential property at 20005 NE 13th Circle. This also needs to be shielded or remedied by a tall wall
- This project would significantly change the night sky. There are many mammals in the wooded residential lots and the wetland at 20009 NE 14th Street, which is within 70 feet of the proposed development (including deer, which use the proposed development to move to/from the Camas Meadows Golf course.)

Proposed measures to reduce or control light and glare impacts, if any:

- The Camas code referenced above needs to be enforced such that residential properties and animal habitat are completely shielded from the light used and emanating from the site.

12. Recreation

The revised SEPA is incomplete:

What designated and informal recreational opportunities are in the immediate vicinity?

- Developer did not mention that Union High School with enrollment over 2,000 students and all their sports facilities, including walking paths are along Friberg-Strunk Road. It is just 1,839 feet away.
- They only mention a golf course and a sports complex further away

Would the proposed project displace any existing recreational uses? If so, describe.

- Currently the sidewalks are used by Union High School daily for a class called "Fit for Life walking"
- Cross-country teams from the High School run along this road
- Due to exposure to vapors and fumes during exercise, and the attractive nuisance of a convenience store, these school and recreational activities may have to be abandoned by the students and the school district

14. Transportation

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).

We have contacted the City of Camas' engineering department, regarding questions arising from reading the pre-application meeting notes dated August 8, 2022. There are access spacing standards that should not be deviated from when they would make car travel unsafe. A permitted left turn into the parcel short of the existing 660 ft minimum spacing standard would create a high risk left turn.

We have already experienced another deviation that was granted for the Oak Tree Station, for which drivers are often caught off-guard for having to slow down for vehicles entering via a right turn to the food truck driveway on Friberg-Strunk Road.

As Union High school begins session next week, it will be interesting to see if this deviation will result in any vehicular accidents, because it does not allow drivers enough time to react to a car slowing down ahead of them.

Concerns:

- Will NE 13th Street receive a left turn median turning strip/lane into the gas station?
- Will the speed limit be lowered to 25 mph?
- Will the traffic coming north on Goodwin be warned with a flashing sign about "slow traffic ahead" whenever a car is stopped in the west-bound lane awaiting it's turn to turn into the driveway?

These are the unanswered questions:

- On page 6, "Streets: 4.c. ...The applicant will be required to dedicate ... and a center left turn median." Does the applicant have to widen the road to accommodate this median? Will a left turn allowed from NE 13th Street into the proposed development? If so, will there be a median lane, essentially widening that portion from the existing 3 lanes (1-east, 1-west, 1-right turn) to 4 lanes with the center median lane? How long would that median lane be and would it extend into the Clark County portion of the road, even to the west of the parcel?
- And, will cars exiting the proposed development be allowed to make a left turn? If not, will a concrete traffic curb be installed to prevent this?
- Will funding be set aside for repair of our fence, if the gas station access/egress situation caused damage to our fence through a vehicular accident?

Due to the poor sight distance created by the uphill and around the corner design of Goodwin Road, one would think cars would travel at the recommended 35 mph.



However, most don't and as a remedy would you consider lowering the speed limit to 25 mph to accommodate this development to prevent rear-end collisions resulting from left-turn being allowed from the proposed development?

- also on page 6, "Streets: 5.b.i. Meeting the required offset from the back of sidewalk would further reduce the developable area. ii. A deviation request from the minimum 50-foot setback requirement should be submitted. A deviation request from this standard would be supported by the city engineer."
- The developer is asking the City to disregard the setback "standards" and allow them to place more parking spaces closer to the road.

Will the City of Camas uphold the setback standard?

I request that the City of Camas reject granting any deviations.

- also on page 6, "Streets:6. "Per CDSM Table 3, Access Spacing Standards on a roadway classified as an arterial are 660-feet minimum ... c. A deviation request from meeting the minimum access spacing required should be submitted."
- The developer is asking for a dangerous shortening of the City access standard. This will result in rear-end collisions. West-bound collisions will almost exclusively be suffered by City of Camas residents as they come up the hill on Goodwin from the homes below. I predict that east-bound collisions will be suffered mostly by high school students on their way to school.

The City should protect its citizens and reject any request for a deviation for this high-risk development.