

## Proposed Project on 13th Street in Camas (Clark County Tax Parcel 176148000, SPRV23-06)

From Kristin Price <19813mkp@gmail.com>

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To Community Development Email <communitydevelopment@cityofcamas.us>

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To: Community Development Office, City of Camas (communitydevelopment@cityofcamas.us)

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

Date: August 28, 2024

Respectfully submitted,

M. Kristin Price (19813 NE 13th Street, Camas W.A.)

On behalf of families residing in the vicinity of the proposed convenience store/gas station, request is made for an extension of the time allotted for review of revised SEP report and additional documents. Residents in the nearby neighborhoods have only recently learned of the the revised SEP report. The City of Camas website indicates recent posting of documents (8/22/2024). Project development has taken place without sufficient planning and consideration for the neighborhood, the community, students & faculty of Union High School. While the proposed project cites adjacent properties in its description, the revised SEP application fails to address environmental impacts for multiple neighborhoods to the north and west of the proposed project site.

To facilitate further review, additional materials are needed: a detailed schematic of the proposed facility, with any modifications; and a schematic with detail about anticipated roadway/sidewalk modifications both on-site and adjacent to the facility. A full copy of the referenced Traffic Analysis Report should be available for review, with updates to reflect current traffic flow. It appears that additional studies may be required before reasonable consideration of this project.

Comment: The proposed project requires an updated study of traffic impact. The current study does not accurately represent the volume of traffic in this area, with recent increases due to residential areas to the east, industrial development at the intersection, new high-rise housing on 1st Street, and newly constructed commercial and office buildings. There are significant safety concerns related to the positioning of the project at a busy intersection. The project design does not provide safe entry and egress from the facility site. The proposed facility proposes entry across a stream of traffic on 13th Street - impeding traffic flow and increasing the risk of crashes near the location. Modifications are needed in the project design in terms of crosswalk design and

addressing pedestrian safety, including safety for students who walk or bicycle to school at Union High School. The proposed location would interfere with safe and efficient school bus transport for an extended period of time each afternoon. An updated traffic study detailing impact at peak hours and impact of traffic associated with the industrial facility under construction on the east side of the intersection should be requisite to approval of the proposed project.

## 1.3. Water runoff (including stormwater):

1) Describe the source of runoff (including storm water) and method of collection and disposal. The main source of runoff is from stormwater. There will be runoff from impervious roof area, drive aisles, parking areas, and landscaped areas. Onsite catch basins will connect to a pipe network that leads to an underground detention facility that will discharge to an existing roadside ditch. Runoff around gas pumps will go through an oil/water separator before being discharged to the storm sewer.

2) Could waste materials enter ground or surface waters? .... Yes, if waste materials were somehow released or dumped into surface runoff flows, substances associated with the source material could enter ground or other surface waters. There is no proposal to release waste material to the ground or to surface waters.

Comment: The SEP proposal does not adequately address the potential for discharge impacting the Lacamas Lake watershed.

7. Environmental Health Proposed measures to reduce or control environmental health hazards. Air. a. What types of emissions to the air would result from the proposal during construction, operation, and maintenance when the project is completed? If any, generally describe and give approximate auantities if known.

Construction equipment emissions and dust on the short term. Long-term emissions will be produced by automobile traffic and normal commercial/retail uses as well as possible vapor from the gas tanks.

Comment: The SEP proposal does not include an analysis of the environment impact related to air pollution in the nearby neighborhood areas or approximated quantities of pollutants. How would climate variations (temperature, wind) affect these patterns of pollution?

## 7. Noise

Comment: The revised SEP application indicates a plan to scheduling fueling truck visits between 7p - 7a. This plan has implications for adjacent neighborhoods in terms of noise and disruption during these hours. A clearer plan is needed in terms of operating hours for this location, minimizing impacts for families residing near the location.

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

Camas Meadows Golf Club is adjacent to the east. The Harmony Sports Complex is approximately  $\frac{1}{2}$  mile to the west.

Comment: The application does not consider current recreational uses of the area, including bicycle paths and walking paths on Friberg-Strunk Road. The proposed facility will interfere with safe passage for bicyclists and pedestrians. The proposal does not identify sports events at Union High School in terms of planning. The facility will result in traffic disruption when events are scheduled at Union High School.

14d. 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).

Frontage improvements are proposed to bring NE 13th Street up to half-width roadway standards. NW Friberg-Strunk Street is currently built out to standard.

Comment: Further detail is needed about anticipated improvements, including modifications to roadway and construction of sidewalks to permit safe passage for pedestrians in an increasingly busy area.

h. Has any part of the site been classified as a critical area by the city or county? If so, specify.

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There is one Oregon white oak on site

Comment: Mitigation has been proposed. However, the area identified for mitigation is Salmon Creek - a geographic area more than 10 miles from the proposed site. Further detail is needed to establish mitigation in the area adjacent to the proposed site, e.g. creation of a buffer area with plantings to the west of the site and detail about other proposed plantings on site or in the immediate area.

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

The applicant will pay transportation impact fees. A west bound left turn lane on NE 13th Street is proposed that will improve safety at the site access

Comment: The revised SEP proposal fails to address the impact to traffic on 13th Street, where the proposed entry to the site is near the intersection, west of the traffic signal at the intersection. The site plan requires modification to establish separate entry and exits to the proposed location. The proposal needs to assure that driveway access will be maintained for residents living along 13th street and in adjacent neighborhoods.

15. Public Services.

The revised SEP application confirms that additional public services (for example fire protection, police protection)

'Yes. The completion of this development will increase the need for public services in the area.' Comment: The SEP proposal does not address increased needs for public services. - including law enforcement and fire department services.