

Carey Certo

From: Russell Wegner <russwegner@mac.com>
Sent: Saturday, November 30, 2024 12:34 PM
To: Robert Maul; Community Development Email
Cc: bforback@gmail.com; Yvette Sennewald; Carey Certo; Alan Peters; Kristin Price; Joan & Rich Rickard; Barbara Wegner; Randy Nosrati; Barb Wegner
Subject: Re: SPRV23-06 - 13th Street Gas Station -December 12 Hearing Comments Submittal
Attachments: Wegner.Comment.11.25.24..Gas.Station..Hearing.pdf

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City of Camas,

Please find the attached letter/ comments for the upcoming hearing on December 12. We would like this included in public record. Please confirm receipt.
Thank you.

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***Russell and Barbara Wegner
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November 25, 2024

City of Camas

We are expressing our concerns for this hearing regarding the proposed construction of a gas station and car wash in our neighborhood, specifically 13th Street Gas Station: File Number SPRV23-06.

While I understand the importance of providing essential services to our community, I believe that this particular project may have detrimental effects on our quality of life, environment, and local economy.

- 1. Traffic and Safety Concerns:** The addition of a gas station and car wash is likely to increase traffic congestion in our area. The influx of vehicles can compromise the safety of pedestrians, cyclists, and especially children. Our neighborhood is primarily residential, and the expected volume of cars could pose significant safety hazards.

2. Environmental Impact: The construction and operation of a gas station can lead to increased water air, and noise pollution, which would negatively impact our community's health and well-being.

3. The potential for oil spills and groundwater contamination is a considerable risk that could threaten local ecosystems and drinking water sources.

- 1) A medium gas station puts out around 400,000 liters of gas per month. That puts out 24,000 liters of compound/ vapors which equals 1 6,000 gallons of compounds/ vapors each month
- 2) Vapors travels approximately 600 feet in the surrounding area in all direction depending on winds
- 3) Diesel can put out double this number.

4. The study of wells in the proximity has not been completely and responsibly addressed.

A major drinking water Aquifer that is under and within 200 feet of the gas station AND supplies all the wells on 13th street (over 40), most of which are not tagged or on public record.

1. Drinking water contamination is a number one risk water plus potential contamination risk for wildlife, wetlands.

The Washington State Dept. of Health email of November 24, 2024 to City of Camas regarding **Critical aquifer recharge areas map** states

“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.

2. . Yes, in “accordance (DOE 2019 SWMMWW)The Preliminary Stormwater Technical Information Report (PTIR) dated November 2023, was prepared by PLS Engineering is flawed. However, The PTIR and hence the SEPA report are flawed. There is no complete review of the SEPA document and the project from The Dept. of Ecology and other pertinent agencies.
3. For example, there is no reporting or even reference to close by wells from DOE - the SEPA is invalid and this appeal should stand.
4. The majority of the over 40 wells ON 13th ST AND VERY NEARBY are not on public record. The Dept. of Ecology, Camas and the County have **no record** of these wells. They have no tags or identification numbers for or public record.

5. With these legal wells not on the county, state or public record, there is no reporting of the Aquifer and the impact of the gas station effect on drinking water, the SEPA is greatly flawed for the gas station/ car wash. At particular risk is the first one under 100ft away. The aquifer for these wells is directly under the gas station

Stormwater and water contamination risk is also not being fully addressed, the SEPA is invalid.

The distances of this environmentally risky business is not only too close to the over 40 wells and drinking water resources, but also the gas station/ car wash would sit above Lacamas Prairie, Lacamas Creek and Lacamas Lake. All the pollutants from this project will flow directly downward to these important “protected” critical environmentally sensitive areas. Measurements to these critical areas needs to be documented and recorded properly by 3rd party independent professionals not hired by developer. This has not not been determined or documented under the SEPA prepared previously for Camas.

According to Center for Watershed Protection an arm of DOE, like Water Resource Board:

“Across our urban and suburban watersheds, hidden culprits are polluting our waterways. “

The Illicit Discharge Detection & Elimination (IDDE) Program as part of The Dept. of Ecology finds and fixes hidden stream polluters.

On record regarding this location:

IDDE Inspector **Merck Strand** has identified this area as a

“Special Wellhead Protection Area and is in a Critical Aquifer Recharge Area. “

If PTIR was prepared in accordance with Ecology’s *Stormwater Management Manual* and in accordance with Dept of Ecology approved mapping, then why are they proposing this project in a **Critical Aquifer Recharge Area** clearly identified as a **“Special Wellhead Protection Area”** as identified by the Inspector -

6. Another issue with the SEPA is that Offsite boundaries for Wetland A were estimated by visual observations “no recorded measurements and actual buffer determinations are included in the report.
7. Bradshaw Lomatia, which only recently came off endangered species list and was written about in The Columbian paper recently stated that it could easily come back on endangered species list and it is in very close proximity.
8. Safety of Children - by having this business at this location, heavy, traffic, alcohol, litter, and unsavory loitering are concerns.

9. Across the country and in other states hundreds of new gas stations have been forbidden to be built for many of these reasons.

1) If this business into bankruptcy in the near future (as who will do the estimated \$200 million dollar cleanup for the City of Camas? An insurance bond should be a strong consideration.

2) *Gas station numbers have been decreasing at a sharp rate in the past three decades and the trend is expected to continue in the coming years, according to Shubhendra Anand, vice president of research and strategy at Market Research Future. In fact, at least a quarter of service stations globally are at risk of closure by 2035 without significant business model tweaks, according to consulting firm BCG.*

1. **Property Values:** Studies have shown that properties located near gas stations can experience a decrease in value. This decline can affect homeowners' investments and the overall appeal of the neighborhood, which is a concern for many
2. The owners of homes of with wells have property value risk with their precious water resources in danger with a gas station over their aquifer.
3. **Impact on Local Businesses:** The introduction of a gas station and car wash may drive business away from our local establishments, which are essential to fostering a strong community. Supporting local businesses helps maintain the character of our

neighborhood and contributes to our economic stability.

Community Character: Our neighborhood is known for its family-friendly atmosphere and community-oriented spaces.

4. The establishment of a gas station and car wash may detract from this appeal, changing the character of our area in a way that many residents may find undesirable.

In light of these concerns, I urge the City Council to reconsider the approval of this project. We need to prioritize the well-being of our community and look for solutions that align with our vision for a sustainable, healthy, and vibrant neighborhood. Thank you for taking the time to consider my perspective. I hope you will take the necessary steps to protect our community's interests.

Sincerely,

Russell Wegner

Russell Wegner

Barbara Wegner

Barbara Wegner