

**Carey Certo**

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**From:** Joe Turner <jtpc1@icloud.com>  
**Sent:** Friday, November 15, 2024 7:36 AM  
**To:** Alan Peters; Karin Nosrati DC; Mullaney, Patrick J.; Horenstein, Stephen W.; Carey Certo; Yvette Sennewald  
**Subject:** Re: Critical aquifer recharge areas map

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As I noted at the hearing last night, all parties to the appeal (the City, the applicant, and the appellant's representative (Ms. Nosrati)) shall cc all parties on all new evidence and testimony they submit. This order only applies to these three parties. The parties are not required to cc everyone who has commented on the application. The City will post all of the exhibits received on its website for other members of the public to review.

Please do not submit documents directly to me. The City will mark all submittals as exhibits and forward them to me.

Also, please send submittals to the City to [communitydevelopment@cityofcamas.us](mailto:communitydevelopment@cityofcamas.us) rather than to all of the City staff included in this email.

Also, to reiterate my oral order. All new submittals shall comply with the following deadlines:

- The applicant, the City, and the appellants shall submit their arguments regarding the SEPA appeal process by 5:00 pm on Thursday November 21, 2024.
- All parties shall submit their rebuttal arguments regarding the SEPA appeal process by 5:00 pm on Wednesday November 27, 2024.
- All parties, including the general public, shall submit all new testimony and evidence by 5:00 pm on Friday December 6, 2024.

In addition, I will issue my order outlining the hearing process by 5:00 pm on Friday December 6, 2024.

I will reconvene the hearing in this matter at 4:30 pm on Thursday December 12, 2024.

Ms. Certo, please include this email as an exhibit in the record for this case.

Thank you  
Joe Turner  
City of Camas Hearing Examiner

On Nov 14, 2024, at 2:49 PM, Horenstein, Stephen W. <SHorenstein@schwabe.com> wrote:

Thank you Alan.

Mr. Turner, the applicant is compelled to ask for full continuance this evening based on the receipt of this new information in the last 90 minutes. We do not have the time or the technical ability to determine how it affects our site plan, our analysis of the issues raised or the viability of the staff analysis at this point. We will need to engage a hydrogeologist to assist. As water is the most significant issue in this matter, we believe that a full continuance is warranted.

Many thanks...Steve

On Nov 14, 2024, at 2:37 PM, Alan Peters  
<[APeters@cityofcamas.us](mailto:APeters@cityofcamas.us)> wrote:

Hi Joe,

I wanted you to be aware of this email we received today from the Department of Health. We are addressing this with the other parties.

**Alan Peters, AICP**

Community Development Director

Cell 360-409-1475

Desk 360-817-7254

[www.cityofcamas.us](http://www.cityofcamas.us) | [apeters@cityofcamas.us](mailto:apeters@cityofcamas.us)

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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,

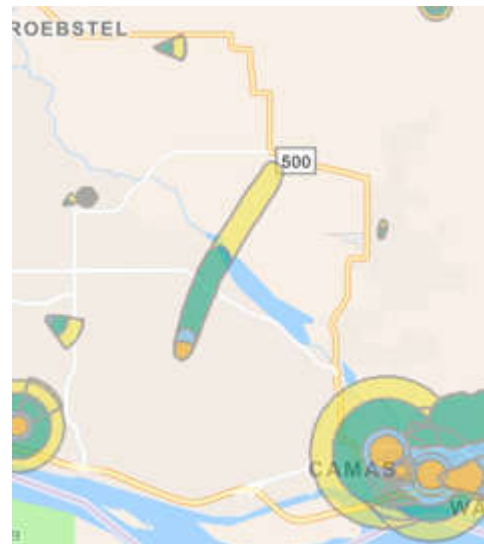
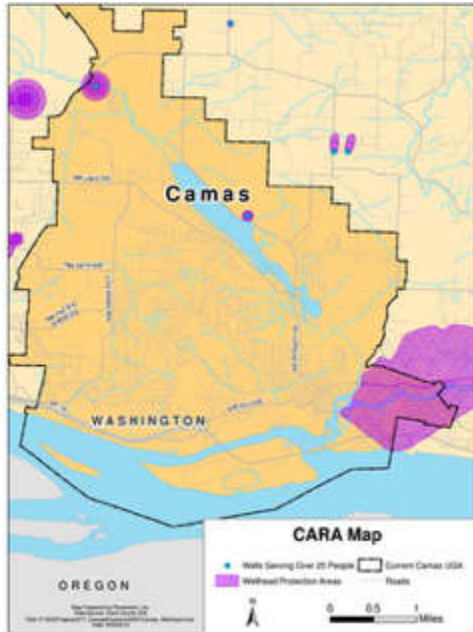
I had an inquiry relating to a City of Camas project that brought my attention to your critical areas requirements &, by extension, mapping.

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**

Wellhead Protection Program Coordinator  
Office of Drinking Water

Environmental Public Health Division

[deborah.johnson@doh.wa.gov](mailto:deborah.johnson@doh.wa.gov)

[doh.wa.gov](http://doh.wa.gov) | 253-433-4054



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