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## Rethink Gas Station on NE 13th St

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To Community Development Email <communitydevelopment@cityofcamas.us>

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To the City of Camas Community Development Department,

I am aware of the proposal to build a gas station and convenience store at the intersection of NE 13<sup>th</sup> Street and Friberg/Strunk Road. I live nearby and am very familiar with the intersection. I also have reviewed many of the publicly available documents relating to the proposal. I urge you to reconsider the proposal.

Although the lot in question is zoned for business uses, a gas station is not good fit for that particular lot.

- It is too small to accommodate a gas station and comply with applicable environmental and building laws.
- It is too close to an already busy and dangerous intersection.
- The residential areas surrounding the gas station do not have sidewalks, and pedestrians walking to the convenience store will be at significant risk.
- The gas station presents significant environmental risks to neighboring wetlands.

The gas storage tanks are proposed to be less than 100 feet from the private drinking water well on the property immediately to the west. This is contrary to state law. Furthermore, the property owners with wells within  $\frac{1}{4}$  of a mile of the gas station will all be required to pay for independent inspections of their wells as part of the appraisal process when selling their homes. (*FHA Single Housing Policy Handbook for Appraiser and Property Requirements.*) It is not right to impose these increased costs on the existing residential homeowners.

The environmental review looking for evidence was flawed in that the key issue is the impact on and presence of wetlands, but the review in question involved taking a single soil sample in August, the peak of a record dry summer. The lot in question frequently has standing water, but not in August.

Further, the environmental study ignores wetland areas in very close proximity. The lot immediately to the west has standing water much of the year, immediately along the proposed gas station. To lots immediately to the north (across NE 13<sup>th</sup>) have wetland areas as well. These wetland areas are all much closer than what is permitted for a gas station under applicable law.

In addition, the very sensitive Lacamas Creek and Heritage Trail area is less than  $\frac{3}{4}$  of a mile to east of the lot, downhill. That is also home to the largest camas lily field in Camas. Leaks, accidents, airborne particulates, runoff, and ground water seepage are all potentially significant dangers. The city of Camas should not sacrifice one of the last natural vestiges of its name-sake for a gas station.

The proposed plans depend on the city granting variances or deviations from the city's standard building and zoning laws. These deviations or variances should not be granted. The single planned entrance and exit is half the distance to a busy and dangerous intersection than permitted by law. The parking spaces do not comply with the 50 foot setback requirement imposed by law. There is no good reason or the city

to grant exceptions (deviations) from its law to permit the gas station to be built as proposed. The lot is simply too small for all that is planned.

The gas station plans do not provide enough room for large vehicles, including gasoline refueling trucks, to safely access the station to refill the tanks. The circulation plans will require these large trucks to block all of NE 13<sup>th</sup> Street when entering and exiting the property. This will be especially dangerous for westbound traffic on NE 14<sup>th</sup> Street, which has significantly limited visibility when approaching the intersection, given the curve and slope of the street there.

Only one entrance and exit from the gas station is going to increase congestion at an already strained intersection, which is only going to get much worse with the increased development in Fern Prairie, and the very large industrial warehouse being built immediately across the street from the proposed gas station. Eastbound traffic on 13<sup>th</sup> Street will interfere with and block the entrance and exit to the gas station. Westbound traffic on 13<sup>th</sup> Street will be blocked by anyone waiting to turn left into the gas station, which will then interfere with the entire intersection.

The intersection in question is high traffic, and less than  $\frac{3}{4}$  of a mile from the high school. It is extremely busy, especially during peak hours when school is in session. The traffic study, however, was conducted when school was not in session. It makes a mockery of the traffic study.

The intersection in question, and all of NE 13<sup>th</sup> Street is far more dangerous than the city must realize. Many accidents occur there, not all of which are reported. Those that are reported are split between jurisdictions (the city of Camas and the county). All of this is expected to be worse with the continuously increasing traffic due to development in Fern Prairie and the new warehouse across the street from the gas station.

NE 13<sup>th</sup> Street does not have sidewalks or bike lanes. If the convenience store goes in, it will attract pedestrian traffic from the many residences along NE 13<sup>th</sup> Street. Children in particular will ride their bikes and walk to the convenience store, as nothing similar is within walking distance. This is a very dangerous recipe. No businesses attracting pedestrian or bicycle traffic should be built on NE 13<sup>th</sup> Street unless the proper access infrastructure is also built.

Gas stations and convenience stores have long hours and are brightly lit. The bright lights will cause light pollution for the surrounding residential neighborhood.

The gas station and convenience store, especially with the addition of a car wash and self service vacuum will be very loud. It will disrupt, late into the night, the residential neighbors. The self-service vacuum is planned to be less than 100 feet from the closest residence.

Gas stations are known to be centers of crime. A recent article published by the convenience store industry notes that "c-stores and gas stations combined were the site of 13.8% of robberies [in 2022]. According to the FBI, 4.5% of all reported violent crime in 2022 took place at a gas station or convenience store." Convenience Store Operators Grapple with Rising Crime, Danielle Romano, Feb. 12, 2024 (available at: <https://csnews.com/convenience-store-operators-grapple-rising-crime>). This should not be placed in a residential area, or in a business area directly bordering residential neighborhoods.

Given all of these concerns and additional concerns that others are likely to raise, the city should not approve the proposed permits. Instead, the city should either decline the application or carefully work through all of these various issues.

The property in question could be the location of many different and profitable businesses, but it simply is not the right location for a gas station, convenience store, and car wash. It is too much to fit on that lot, and the traffic, environmental, and safety implications will be negative.

Sincerely,  
Collins Clark  
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