


Comments re SEPA for facility at the intersection of 13th Street & Friberg Road

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To Community Development Email <communitydevelopment@cityofcamas.us>

 1 attachments (55 KB)

cross-walkpdf.pdf;

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Comments are included both in text and in an attached pdf file.

Thank you for receiving comments regarding the SEPA document for a proposed construction of a gas station / carwash / convenience store at the intersection of 13th Street and Friberg Road. Review of the SEPA document raises multiple concerns. I strongly urge additional time for review of this proposal within the community, including additional studies and further consideration of environmental impacts.

What is the demonstrated need for this facility in the community?

How does construction of a new gas station fit in with statewide environmental initiatives in terms of encouraging clean energy? (Washington State Department of Ecology, Climate Commitment Act) Do any benefits outweigh the risks associated with the construction of a gas station adjacent to a residential area and a high school with outdoor recreation facilities?

Have environmental impacts been adequately addressed?

EARTH - Clarification of soil content is needed to address the impact on the drainage field. Note that this land would currently support extension of a green space use, wetland habitat area, park use or agricultural use (nursery). Erosion control measures are not detailed, it appears that the project would interfere with existing drainage systems.

There is existing vegetation on the property, now landscaped for residential use. There is a beautiful Priority I Oregon White Oak tree on-site. This tree and other landscaping should be incorporated into the design of any commercial space on the property.

AIR

The proposal acknowledges: "Long-term emissions will be produced by automobile traffic and normal commercial/retail uses as well as possible vapor from the gas tanks."

The proposal does not provide adequate solutions to reduce or control these impacts.

Research indicates that Stage 2 vapor recovery systems in the gas storage tanks and delivery systems are not sufficient to mitigate the impact of air pollution from a facility. Wind patterns (high E/NE winds) will result in noxious vapors being carried to residential areas immediately north and west of the proposed facility.

There is a risk for igniting a wildfire - a particular concern given the recent history of local wildfires during hot, dry summer periods and nearby wooded areas. The proposed project would add to hazardous levels of AQI noted in the last two years in our community. Accordingly, health consequences are present for residents living nearby, including children and elderly residents.

The dispersion of toxic materials would threaten the viability of small organic agricultural plots (home gardens) in this area.

WATER

The proposal acknowledges: "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."

Note the need for critical review of SWWPPP (Stormwater Pollution Protection Plan)

The proposed project threatens water supplies for nearby residences that have existing well systems. The proposed project would impact the supply of groundwater, with the potential of increasing pollution to Lacamas Lake, downhill from the proposed facility.

The project should include steps for decommissioning of the underground fuel storage tanks and restoration of the property after use.

The proposed project creates a dangerous intersection. This project would impact residents of the area, families of Union High School, and drivers traveling on 13th Street, 1st Street, 192nd Street and Friberg Road. Winter months and ice accumulations on 13th Street have contributed to multiple vehicle crashes along this route. The proposal does not address concerns related to maintaining road safety, including obstruction of line of sight for drivers and management of known seasonal hazards. The project would inevitably result in an increased number of crashes at or near this intersection.

Modifications to roadway and the intersection will be necessitated by the facility. The proposed project suggests entry that is unacceptably close to an active intersection. There is no provision for safe egress from the facility in the event of an emergency. The proposed traffic flow does not provide safe exit from the facility for traffic heading west on 13th Street. The proposed project would disrupt both east-bound and west-bound traffic on 13th Street and Friberg Road.

There is a critical need for an updated transportation study. The current study is inadequate and contains inaccurate estimates. The transportation study does not address traffic volume during late afternoon (school dismissal) hours. The proposed project does not adequately plan for traffic flow, including the delivery of fuel. Plans do not address queuing of vehicles within the property, particularly during refueling operations.

There are markedly increased safety risks for both drivers and pedestrians. The operation would interfere with school bus arrival and departure, as well as special event traffic. The project interferes with safe recreational use for bicyclists and runners. This is a route that has been established for safe transit on a well-known bicycle route. The project proposal does not provide for safe transit for pedestrians (students walking to school). Upgrading sidewalk access around the facility and across

13th Street should be required.

Hours of operation for the service station/convenience store should be limited to 9:00 pm due to the proximity to adjacent residential areas. A retaining wall is needed at the rear to limit intrusions to adjacent residential areas, given the risk of increased crime.