

**Carey Certo**

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**From:** Robert Maul  
**Sent:** Tuesday, July 19, 2022 12:36 PM  
**To:** Joe Turner  
**Cc:** Madeline Sutherland; Carey Certo  
**Subject:** FW: Hood St Subdivision Wetland Mitigation Plan  
**Attachments:** Hood St Subdivision Wetland Mitigation Impact on CSE Properties.pdf; 1819 Columbia Summit Dr Curbside water flow.mp4

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**From:** KENNETH VARTANIAN [<mailto:kenvart@comcast.net>]  
**Sent:** Tuesday, July 19, 2022 11:59 AM  
**To:** Madeline Sutherland <[MSutherland@cityofcamas.us](mailto:MSutherland@cityofcamas.us)>  
**Cc:** Robert Maul <[RMaul@cityofcamas.us](mailto:RMaul@cityofcamas.us)>; [stevem@landerholm.com](mailto:stevem@landerholm.com); [gordonf@aol.com](mailto:gordonf@aol.com); [chris.reive@gmail.com](mailto:chris.reive@gmail.com); [b.mann@in-situ.com](mailto:b.mann@in-situ.com); Joanna Wu <[im7216@gmail.com](mailto:im7216@gmail.com)>; Ron McKnight <[ron.w.mcknight@gmail.com](mailto:ron.w.mcknight@gmail.com)>; Stephen Darnell <[financialwizard2@comcast.net](mailto:financialwizard2@comcast.net)>  
**Subject:** Hood St Subdivision Wetland Mitigation Plan

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Dear Ms. Sutherland,  
Attached please find a supplementary document to my written and oral testimony regarding the impacts of the Hood St. Subdivision development on abutting Columbia Summit Estate properties. Also let me know if the attached video doesn't transmit properly and I'll make other arrangements to deliver it to you. Finally please send a copy of these materials to the Examiner for his review. Thank you very much for your continued assistance.  
Regards,  
Ken Vartanian

July 19, 2022

Via email to [MSutherland@cityofcamas.us](mailto:MSutherland@cityofcamas.us)

City of Camas  
Building Department  
Attention: Madeline Sutherland, Planner  
616 NE Fourth Ave.  
Camas, WA 98607

RE: Hood Street Subdivision Revised Preliminary Wetland Mitigation Plan dated July 13, 2022

Dear Ms. Sutherland,

The following supplements my earlier written and oral testimony requesting more time to evaluate the overall and water management impacts of the proposed Hood Steet Subdivision development on abutting properties and the Columbia Summit Estates Community at large. On June 21, 2022 the United States Army Corp of Engineers (USACE) conducted a second survey of the proposed development site and identified two additional wetlands (labeled B and C on the revised wetland map) and an additional wetland area within the previously identified wetland unit (labeled A). As a result, on July 13, 2022 Olson Engineering issued a revised Preliminary Wetland Mitigation Plan, hereinafter (the "Mitigation Plan"), for the Hood Street Project NWS-2022-00219. On July 18, 2022 the Mitigation Plan was made available for public access on the City of Camas website. The supplemental questions and comments that follow are based on the Olson Engineering revised Mitigation Plan.

- The USACE survey verified the size of Wetland C as 6,333 sq. ft. not including the buffer zone. The boundary of Wetland C including the 50 ft buffer zone extends North into 3 bordering properties in Columbia Summit Estates (CSE) owned by Mr. Vartanian, Mr. Fogg, and Mr. Reive.
- On Page 4, Section 3.0 of the Mitigation Plan discussing Avoidance and Minimization states; "Site plans have been modified to avoid as much direct impact within Wetland A as possible. However, some direct impact within Wetland A is still necessary to allow for a viable project and reasonable use of the property. Direct impacts were also unavoidable for all of the wetland area within Wetlands A and B (Fig 5)". Why is the direct impact avoidance and minimization plan only defined for Wetlands A and B?
- On Page 4, Section 4.1 of the Mitigation Plan discussing Wetland Impacts states – "Based on the proposed site plan, unavoidable impacts are proposed to Wetland A, B, and C in the form of grading, excavation and filling (Fig. 5)". How will these unavoidable impacts to Wetland C effect the bordering CSE properties? How will bordering CSE property owners be compensated for these impacts?
- On Page 5 - Section 4.2 of the Mitigation Plan discussing Buffer Impacts states in the Table 5 footnote - "Direct Impacts are proposed for the entirety of Wetlands B and C. Therefore, buffer impacts do not apply". We assume "entirety" includes the buffer zone for Wetland C. Please explain direct impacts and how CSE homeowners within the Wetland C buffer zone will be compensated for impacts.

- Page 13 - Section 6.8 of the Mitigation Plan discussing Demarcation states - "As required by CMC 16.53.040-C, small signs shall be posted at an interval of one (1) per lot or (1) every 100 feet, whichever is less, and perpetually maintained at locations along the outer perimeter of the wetland buffer approved by the responsible official worded substantially as follows: "Wetland Buffer - Please retain in a natural state". How is this possible in the buffer zone for Wetland C extending into CSE properties which have already been developed?
- Additional Question not Addressed in Mitigation Plan - Leaky aquifers fed by underground springs are prevalent on Prune Hill as evidenced by the 12-month constant flow of water from curbside drains. One example close to the Hood Street Subdivision is located at 1918 Columbia Summit Drive where water continuously flows from its southwest curb drain (see video recorded on July 17, 2022). The owner of the property, Jian Wen, stated that the City of Camas tested the effluent ~ 6 years ago and verified its source as an underground spring. It is therefore logical to deduce that underground springs on Prune Hill may also feed the Wetlands in the Hood Street Subdivision. Our concern is when Wetlands are graded, excavated or filled-in, these underground springs may be diverted or blocked causing erosion or reemergence of past water management issues on our properties. Bordering CSE homeowners have made considerable expenditures to resolve water management issues on our properties and do not want to bear that expense again. Therefore, CSE bordering property owners request that the Applicant and/or the City procure Erosion and Water Management Control Bonds and Insurance prior to the start of construction to protect existing homeowners for a period of two years after completion of the Phase 2 Hood Street development.

Sincerely,



Ken Vartanian

CC: Robert Maul – Planning Manager via email [rmaul@cityofcamas.us](mailto:rmaul@cityofcamas.us)

Steven Morasch – via email [stevem@landerholm.com](mailto:stevem@landerholm.com)