

August 23, 2022

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

RE: Vartanian Response to Olson Environmental & Olson Engineering August 16<sup>th</sup> Memos.

Dear Ms. Sutherland,

I've read the Olson Engineering Memos, dated August 16, 2022, in response to the Examiner's Order reopening the record. These memos offer no new "facts", at least none responsive to the questions raised in my past filing ([included herein by reference](#)). Instead, the memos make a 'necessity' argument. In summary - Olson states that if they must avoid all impacts to all identified wetlands, they will lose 5 lots (out of the 18 proposed), which makes the project uneconomic (related to the cost of infrastructure) and does not satisfy the City's overall Community Development Comprehensive Plan to make all new developments denser. I believe the Applicant had already made adjustments related to Wetlands A before submitting the plat currently under review? If so, the proposed plat of 18 lots already absorbed the "3 lost lots" related to that adjustment, and therefore the cost of addressing only Wetlands B & C is at most 2 additional lots - from the 18. A possible reduction to a total of 16 lots (loss of 11%) due to the effort suggested by the Examiner - not, 13 lots (loss of 28%) as claimed by the Applicant.

Further the Applicant ignores the Examiner's concerns about unanswered questions created by the lack of a detailed investigation of Wetlands B & C comparable to that performed on Wetlands A (Geotechnical Site Investigation conducted by Columbia West Engineering in January 2021) and, as I believe, is contemplated by the Code. The Applicant further ignores the Examiner's suggested solution that "The Applicant could reduce or avoid impacts to Wetland C and its buffer by eliminating proposed lots 6 and 8 and modifying proposed lots 5-7, 9 and 10. Indeed, the Applicant makes no attempt to even consider avoiding or mitigating the negative impacts to Wetlands B & C, or to the adjacent properties. Instead, the Applicant presents us with an "all-or-nothing proposition", with all of the risk born by us.

For over 23 years my wife Karen and I have lived at 1821 NW Columbia Summit Drive located immediately north of the proposed Hood Street Subdivision (HSS) and share a common boundary with proposed lots # 5 and #6. Over the years my neighbors and I have witnessed, on numerous occasions, vehicles stuck in the mud in the proposed HSS property. Most recently this occurred on June 21, 2022 when the Applicant's vehicles were stuck in the mud while mowing the grass directly behind Mr. Fogg's and my properties. The ruts in the field, described in the revised Olson Wetland Mitigation plan, were caused by the Applicant's tractor and rescue vehicle. The following day, a USAC engineer was seen on site investigating the rutted area which is now designated as Wetland B and Wetland C. Subsequently I spoke with the USAC engineer re his investigation. My notes from that conversation are summarized below:

- The water source, flow rate and flow direction were not determined for Wetland C during the investigation. It was assumed the source was groundwater.
- The buffer zone for Wetland C most likely extends onto Columbia Summit Estates (CSE) properties owned by Mr. Vartanian, Mr. Fogg, and Mr. Reive, however this was not validated due to potential trespass violations. [Vartanian comment - I can confirm that the land along the Southwest border of my property is wet and slippery year- round.]
- The USAC engineer was unaware of the prevalence of underground springs on Prune Hill. He said normally the developer would inform him of their existence. [Vartanian comment - there are a number of natural water springs on NW Hood St and at 1918 Columbia Summit Dr. that flow year-round. – see photo taken on August 22, 2022 as an example].
- The engineer stated that assuming the water source for Wetland C is an underground spring, filling in Wetland C could have upstream impacts.



*Evidence of underground springs @ 1918 Columbia Summit Dr. - 8/22/2022*

CMC 16.53.03 E (2) (b) re Critical area report – Additional requirements for wetlands requires analysis of Wetland “vegetative, faunal, and **hydrologic** condition” in addition to the minimum required contents defined in subsection D of this section, and in addition to Section 16.51.140. As confirmed by the USAC engineer, hydrologic investigation of the water source, flow rate and flow direction for Wetland C were not determined since the water source was assumed to be groundwater. Therefore, Olson Environmental’ s statement that “If lots 6 and 8 were removed and the wetland impacts were [completely] avoided, it is still likely that the hydrology for Wetland C would no longer be available” is strictly speculative.

CMC 16.53.050 D (1) (b) re Minimize Impacts of Wetlands if Complete Avoidance is Infeasible requires the Applicant to “seek[ing] easements or **agreements** with adjacent land owners or project proponents where appropriate”. Assuming the Applicant is allowed to fill-in Wetlands B and C, the CSE homeowners seek to establish an agreement with City and/or the Applicant. This agreement could be in the form of a Bond to protect existing CSE homeowners against erosion and water damage due to upstream effects of filling in the HSS Wetlands.

Regards,

Ken Vartanian

CC: Robert Maul, Chris Reive, Gordon Fogg, Bill Mann, Joanna Wu, Ron McKnight, Steve Darnell