July 26, 2022 Via email to MSutherland@cityofcamas.us

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

RE: Rebuttal to Olson Environmental and Olson Engineering Responses on the Impact of Hood St Subdivision Wetland Mitigation Plan on Columbia Summit Properties

Dear Ms. Sutherland,

On July 19th I submitted a letter to the Camas City Planning Board expressing concerns that the proposed plan to mitigate wetlands in the Hood St. Subdivision (HSS) could cause water management issues on Columbia Summit Estates (CSE) properties owned by Mr. Vartanian, Mr. Fogg, and Mr. Reive. Subsequently Mr. Mann and Ms. Wu whose CSE properties also abut HSS have expressed similar concerns. On July 20th and July 21st Olson Environmental LLC and Olson Engineering Inc respectively responded to the concerns raised in the July 19th letter. Although we appreciate their response, their answers require further clarity and detail.

The key point in the Olson Environmental response is:

"Although I am not an engineer, my professional opinion is that filling Wetlands B and C will not lead to flooding issues due to their limited storage capacity."

Our questions re the Olson Environmental response are:

- Has a flow rate measurement study been conducted for Wetland C?
- Has a tracer study been conducted to determine the footprint of the flow direction during low and high flow conditions?

Without data, the claim that '... filling Wetlands B and C will not lead to flooding...' is purely speculative. Limited storage capacity of a wetland can lead to flooding if the spring water flow rate is high enough.

The Key point in the Olson Engineering response is based on a Columbia West Engineering (CWE) geotechnical site investigation conducted in January 2021 on Wetland A. The CWE proposal to mitigate potential springs on Wetland A is:

"Perimeter drains may limit increased hydrostatic pressure beneath footings and assist in reducing potential perched moisture areas. Subdrains should also be considered if portions of the site are cut below surrounding grades. Shallow groundwater, springs or seeps should be conveyed via drainage channel or perforated pipe into an approved discharge."

Our questions re the Olson Engineering response are:

- Columbia West Engineering (CWE) geotechnical site investigation was conducted in January 2021 on Wetland A prior to the identification of Wetland B and Wetland C in June 2022. Has a geotechnical investigation been performed on Wetland B and C?

- The CWE mitigation plan suggests "...shallow ground water, seeps or springs should be conveyed via drainage channels or perforated pipe...". These suggestions are in the context of Wetland A which we understand will be maintained as a wetland. What is the ground water, seeps and springs mitigation plan for Wetland B and Wetland C, which we understand will be excavated and filled in?
- Assuming perforated drainage pipe is used to mitigate spring water feeding Wetland C, how will the drainage pipe be maintained? Will the flow rate at the approved discharge point be monitored to provide early warning of blockages, fractures or collapsed sections of drainage pipes?
- If Wetland C is filled in and pipe is used to convey water to an approved discharge point, the flow regime of the spring could be modified upstream effecting CSE properties. How are CSE property owners protected against this possibility?

In our opinion, proper study of recently identified Wetland B and Wetland C has not been conducted. Further, mitigation plans based on Wetland A may not be relevant to Wetland B and Wetland C and are hence purely speculative. Therefore, we reaffirm our request to the City of Camas and/or the Applicant to 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

Ken Vartanian

CC: Robert Maul – Planning Manager via email rmaul@cityofcamas.us
Steven Morasch – via email stevem@landerholm.com
Kevin Terlep via email kevint@olsonenvironmental.com
Peter Tuck P.E via email petert@olsonengr.com