



OLSON
ENVIRONMENTAL LLC
ENVIRONMENTAL SERVICES • GIS • HABITAT RESTORATION

August 16, 2022

Joe Turner, AICP
City of Camas Land Use Hearing Examiner

RE: Hood Street Subdivision (SUB22-01) *Re-opening of the Record -Wetland Impacts*

Dear Mr. Turner:

I am writing to add evidence the Hearing record which was re-opened on August 9, 2022. I would like to address your comments regarding the sequencing requirements of CMC 16.53.050.D.1.

Olson Environmental has extensive experience with wetland delineations in the City of Camas and throughout the Clark County area, and based on our experience, wetlands like the ones here that weren't discovered until the ACOE did its site visit are very common and prevalent throughout Camas's buildable lands supply.

The wetlands that were discovered here are not on the Comprehensive Plan wetland map. The only wetlands shown on the map are those that are previously permitted or identified through the Clark County Local Wetland Inventory (LWI) modelling or the US Fish and Wildlife Service National Wetlands Inventory (NWI).

Point 5 on the Comprehensive Plan wetland map legend states:

"The wetland areas indicated on this map are based on an inventory of wetland areas using existing published data and wetland delineations and may not represent accurate boundaries or the presence of wetland areas on a specific site. Only a site specific analysis can determine the presence, absence, extent and category of wetland areas"

Site-specific studies are always required to determine present or absence of wetlands, and frequently those studies turn up wetlands that are not on the inventory maps. Due to the prevalence of wetlands throughout the City's buildable lands supply that have not yet been inventoried and mapped, an interpretation that the "avoidance" criteria requires a lot count reduction for residential developments would require lot count reductions in future subdivisions throughout the City, jeopardizing the City's ability to meet an average of six units per acre city wide.

The most recent version of the mitigation plan (dated July 13, 2022) proposes .19 ac, .05 ac., and .15 ac. of direct impact within Wetlands A, B, and C, respectively. A total of .19 ac. of indirect impacts are also proposed for Wetland A. The Applicant is proposing the purchase of bank credits for compensation, as allowed by CMC 16.53.050(D)(5). Temporary impacts and subsequent on-site restoration are also proposed within a portion of Wetland A and its buffer (See Mitigation Plan Figs. 6 and 9).

I believe the current mitigation plan has adequately addressed the mitigation sequencing requirements of CMC 16.53.050(D)(1).

The majority of the impact within Wetland A has been avoided, the remaining wetland area will be left intact as an open space tract. In addition, Figs. 1 and 2 also demonstrate that the Applicant has endeavored to alter the design of the subdivision to comply with the minimization requirements of CMC:

- Lot 9 was decreased from 10,775 ft² to 9,000 ft² in Lot 12 within the current plan.
- Road access cannot be further altered to avoid additional impacts to Wetland A. According to the Camas Design Standards, the minimum access spacing for an arterial is 660 feet and no new driveways are permitted. In addition, the spacing requirements cannot be met for a new street intersection for the Hood Street Subdivision off NW 16th Avenue. Therefore, an internal access to any lots fronting NW 16th Avenue is required. The private road tract to serve Lots 12, 13 and 14 was designed to the minimum width allowable to minimize impacts to Wetland A.
- The original storm facility discharge was at the low point of the site, extending approximately 70 feet into Wetland "A". To address energy dissipation, a riprap pad was proposed. This also served as the discharge point for the roof runoff from the south lots. To remove the impact of the riprap on the wetland, the stormwater system was redesigned to be located above Wetland A; see OEI original and current utility plans.

According to CMC 16.53.010.C(2)(a), isolated Category IV wetlands less than 4,350 ft² are exempt from wetland permits. Wetland B is 2,057 ft² (.05 ac.) and does not have a surface water connection to Wetland A to the west or an outlet leading off-site. Accordingly, Wetland B meets the requirements within CMC as being a small, isolated Category IV wetland and should therefore be exempt. Please note that despite being exempt from CMC, impacts to this wetland will still be compensated through the purchase of mitigation bank credits, pursuant to Sections 404 and 401 of the Clean Water Act through the US Army Corps of Engineers and the Washington Department of Ecology, respectively.

Wetland C impacts cannot be avoided. This too is an isolated wetland without a surface water connection to the other wetland units on the site or an outlet leading off-site. It is likely that this wetland is a degraded remnant of a previously larger wetland unit that was present prior to the construction of the adjacent properties to the north. Evidence of this is its shape and proximity to the property line -wetlands generally do not follow straight lines or adhere to property boundaries. If Lots 6 and 8 were removed and the wetland impacts were avoided, it is still likely that the hydrology for Wetland C would no longer be available. This is evidenced on the fact that all the surrounding properties would be developed, with the runoff diverted to the stormwater facility. It is my opinion that Wetland C would not meet the hydrology criteria of a jurisdictional wetland. Once the hydrology is gone, the area would more than likely become a blackberry thicket

Regards,

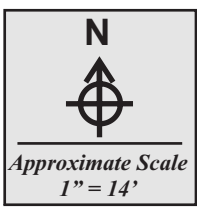
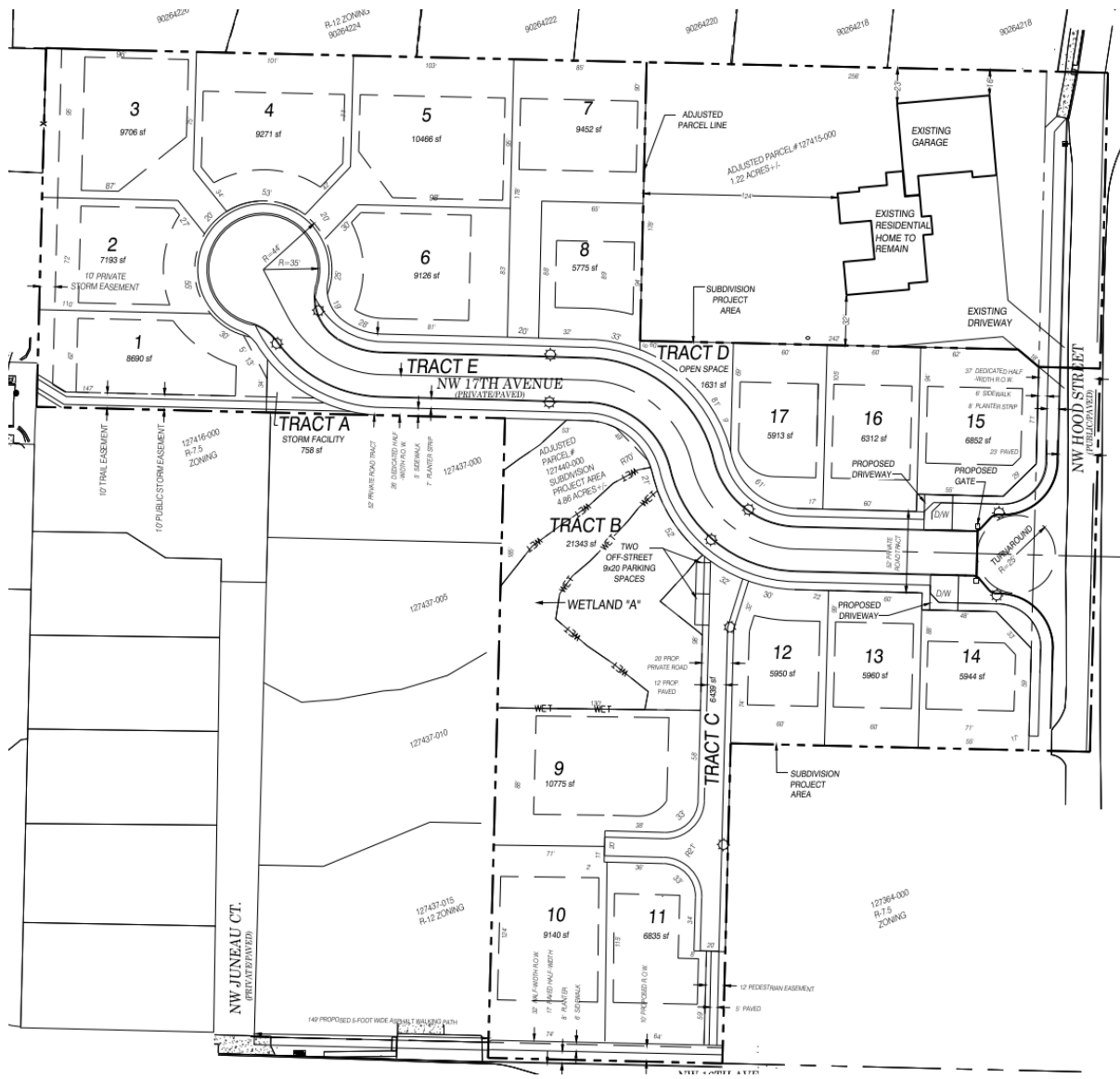
Kevin Terlep

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Wetland Biologist

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APPLICANT:
 Modern NW
 8101 NW Glisan
 Portland, OR 97213

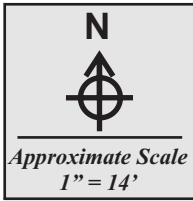
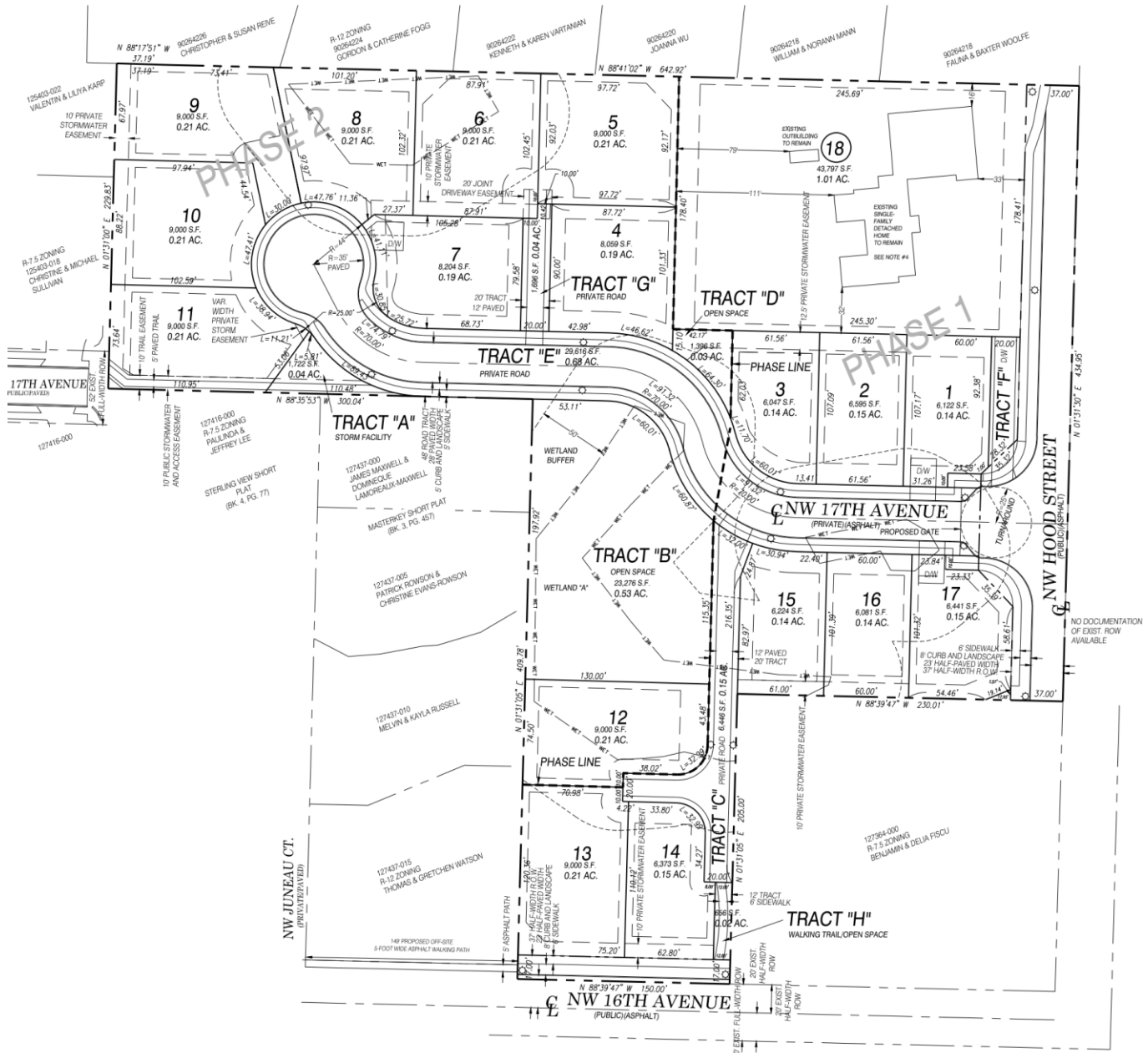
Proposed Site Plans (2021)
Hood Street (SUB22-01)
Camas, Washington



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PROPOSED ACTIVITIES IN:
 Lacamas Creek Watershed
LEGAL: NE & NW 1/4 of S09, T1N, R3E
 W. M.
NEAR: Camas, Washington
COUNTY: Clark County
DATE: August 16, 2022

Figure 1



APPLICANT:
Modern NW
8101 NW Glisan
Portland, OR 97213

Current Proposed Site Plans (2022)
Hood Street (SUB22-01)
Camas, Washington



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Figure 2