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July 20, 2022

Attn: Madeline Sutherland, AICP
City of Camas
Community Development Department
616 NE 4th Avenue
Camas, WA 98607

RE: Hood Street Subdivision Wetland Mitigation Plan Questions from Ken Vartanian

Dear Ms. Sutherland:

I am writing in response to email correspondence sent to you on July 19, 2022 by Ken Vartanian regarding wetland impacts to the Columbia Summit Estates Community (CSE). As Mr. Vartanian points out, I met on-site with the US Army Corps of Engineers (USACE) on June 21, 2022 where the agency verified wetland boundaries. In addition to increased area within Wetland A, USACE identified two (2) additional wetlands, Wetland Units B and C. Accordingly, on July 13th, 2022 Olson Engineering, Inc submitted the wetland mitigation plan I prepared, which was later made available on the City's website.

I would like to take this opportunity to respond to each of the comments made in Mr. Vartanian's concerns, as outlined below.

- 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.
    a. *The buffers don't necessarily extend into these back yards and are most likely considered functionally isolated due to the existing fences, houses, driveways, other impervious surfaces and maintained yards. Functionally isolated buffers are not regulated by the city of Camas Municipal Code as per 16.53.040.B.4.b.*

- 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?
    a. *This is a typo. Some impacts were avoided for Wetland A but were unavoidable for the entirety of Wetlands B and C, in order to provide reasonable use.*

- 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?
    a. *The remaining and wettest area of Wetland A is being left intact. I do not anticipate flooding issues as a result of the partial filling of Wetland A. Wetlands B and C have small storage capacities, down-slope (west), no flow to the northern fence-line. Engineering of the storm water facility will take drainage of the study area (including Wetlands A-C) into account.*

- 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.
    a. *Buffers are regulatory tools to protect existing wetland resources. Indirect wetland impacts are impacts that occur adjacent to the wetland (the buffer) that decrease protections to the existing wetland. Once the wetland is filled, there is no longer a buffer, and thus no indirect impacts. Direct impacts are permanent impacts (fill) to the wetland itself.*
    b. *Yes, we are proposing to fill all of Wetlands B and C. Once that is done, they no longer have buffers associated with them.*

- 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?
    a. This only applies to the existing areas of Wetland remaining in Wetland A, once the proposed fill in Wetlands A, B, and C is complete.

- 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.
    a. *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. Likewise, down-slope flooding is not a likely consequence of filling portions of Wetland A. The lowest and wettest portions of Wetland A, (and also presumably the areas with the highest storage capacity) are being left intact.*

If you have additional question regarding my responses, please feel free to reach out to me.

Regards,

Kevin Terlep

Kevin Terlep
kevint@olsonenvironmental.com
Wetland Biologist
ISA Certified Arborist