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June 8, 2023

Smartlink
c/o M. Debbie Griffin
debra.griffin@smartlinkgroup.com
1997 Exchange Parkway Suite 200
Annapolis, MD 21401

RE: **Critical Areas – Habitat Assessment**
Site: PS25 Camas School Relo
706 NE 14th Avenue
Camas, Clark County, WA 98607

Black Mountain Project No. 220031 – Critical Areas

Dear M. Griffin:

Black Mountain Consulting LLC (Black Mountain) is pleased to submit this Critical Areas Habitat Assessment (the Report) for the proposed telecommunications facility at the location noted above (The Project). The purpose of this Report was to conduct a Critical Habitat Assessment for the proposed action and to provide documentation needed to acquire any necessary environmental permits for this proposed action. The project site contains critical areas that are subject to regulation under CMC Section 16.51. The following document is attached:

1. FINAL Critical Areas Habitat Assessment for PS25 Camas School Relo

In conclusion, this assessment verifies that the proposed project has been designed to comply with the prevailing intent of Section 16.51 of the Camas Municipal Code. To the extent practicable, the project has been designed to avoid and minimize the extent of impacts to critical areas at the site. The project will not result in any net loss of any critical area functions or values.

Authorization to perform the work was supplied by way of Smartlink Purchase Orders No. 159429 issued on November 21, 2022..

Respectfully submitted,

Black Mountain Consulting LLC

Tammy Stempel
Principal

Photo credit: S. James

Final:

Critical Areas Habitat Assessment

for PS25 Camas School Relo

City of Camas

Clark County, Washington

Parcel # 91010000

Submitted to:
Tammy Stempel, Principal
Black Mountain Consulting LLC

Submitted by:
Turnstone Environmental Consultants, Inc.
P.O. Box 83362
Portland, OR 97283

Submission date:
June 6, 2023

List of Figures

1 INTRODUCTION

New Cingular Wireless ("applicant") proposes to construct a new 60' stealth tower to resemble a bell tower at the United Methodist Church ("proposed action") located at 706 NE 14th Ave, Camas, Clark County, Washington. The property is within a Fish and Wildlife Habitat Conservation Area, therefore, a Critical Area Report is required to address potential impacts according to Camas Municipal Code (CMC) 16.57.030. A site plan for the proposed project is in Appendix A.

- **Project:** AT&T Wireless – United Methodist church – Wireless Communication Facility
- **Pre-application ID:** # PA23-10
- **Applicant:** New Cingular Wireless, PCS LLC (AT&T)
- **Project Location:** 706 NE 14th Avenue (Parcel number 91010000) Camas, WA 98607

Clark County GIS mapping identifies the subject property to be adjacent to fish and wildlife habitat conservation areas (i.e., a stream), which is designated as critical areas per CMC Section 16.51.070. Per CMC Section 16.51.130, a critical areas report is required if a proposed development, or construction activities are within or adjacent (within 200-ft.) to a critical area.

The applicant hired Turnstone Environmental Consultants, Inc. ("Turnstone") to conduct Critical Area Habitat Assessment for the proposed action and to provide documentation needed to acquire any necessary environmental permits for proposed action. The project site contains critical areas that are subject to regulation under CMC Section 16.51.

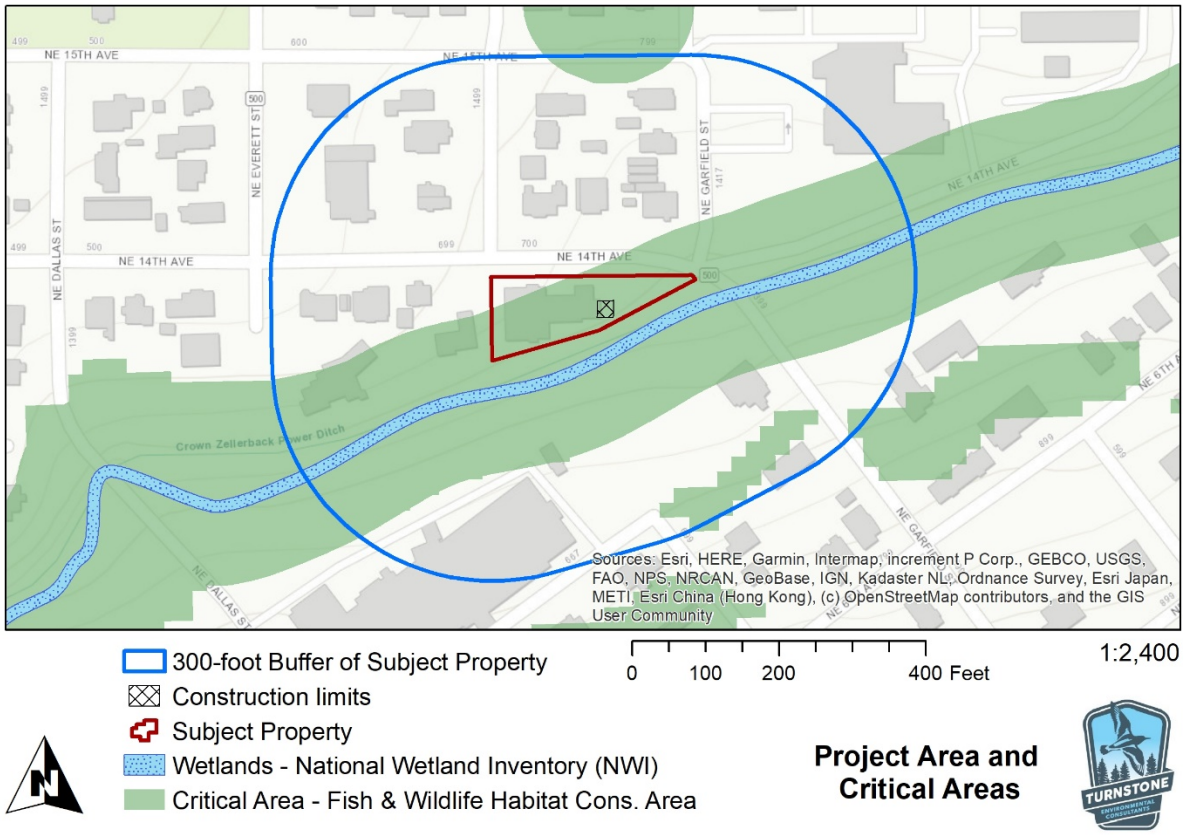

Figure 1. Subject Property and Critical Areas within 300 Feet

2 ASSESSMENT METHODOLOGY

2.1 Qualifications

Turnstone, under contract to the applicant, prepared this critical areas assessment. The chief author of the assessment is Turnstone Senior Ecologist Stephanie James, who has over 20 years of experience as a working natural resource professional. James' work experience includes natural resource inventory, characterization, and analysis, as well as technical writing and editing. Jeff Reams is a wildlife biologist, permitting specialist, and co-owner of Turnstone and has provided professional planning and permitting services for over 25 years. Reams provided senior technical review and oversight for this assessment.

2.2 Methodology

In preparing this critical areas assessment, James conducted a site visit of the project area, riparian habitat, and the adjacent stream, reviewed existing literature and documentation to determine the extent and condition of critical areas present. This field inventory included an assessment of habitat conditions and the collection of field data including representative site photographs.

Turnstone ecologists referenced technical resources and informational databases during the preparation of this assessment include the following:

- Camas Municipal Code (CMC) Chapter 16.61.020 (Critical Area Report – Requirements for habitat conservation areas)
- Clark County database for onsite critical areas
- National Marine Fisheries Service (NMFS) Endangered Species Act (ESA) List of West Coast Salmon and Steelhead
- US Fish and Wildlife Service (USFWS) Information, Planning, and Conservation System (IPAC) database
- US Department of Agriculture, Natural Resources Conservation Service (NRCS) Soil Survey for Clark County, Washington
- Washington Department of Fish and Wildlife (WDFW) Priority Habitat and Species (PHS) data; available at http://wdfw.wa.gov/mapping/phs
- Washington Department of Natural Resources (DNR) Natural Heritage Program (NHP) Natural Heritage Features database

2.3 Agency Coordination

This project has been developed in close coordination with staff from the City of Camas.

2.4 Statement of Accuracy

The analysis and findings presented in this critical area assessment are based on the best available science at the time of preparation, as well as on the best professional judgment of the scientists conducting the analysis. The findings are to be considered preliminary until the assessment has been reviewed and approved in writing by the City of Camas.

3 PROJECT DECRIPTION

The proposed action includes new construction and removal of landscaping vegetation. The proposed action will develop portions of the subject property that are currently occupied by landscaping shrubs and turf, and portions of a sidewalk and parking lot. The new construction includes a bell tower, communication antennae, and ancillary equipment. The project includes constructing a new 60-foot tall radio frequent transparent structure designed with stealth technology on an existing church building (Figure 1, Figure 2). The footprint of the new tower base would be 20 feet by 20 feet (400 sq.ft.). A map of the project area is in Appendix A.

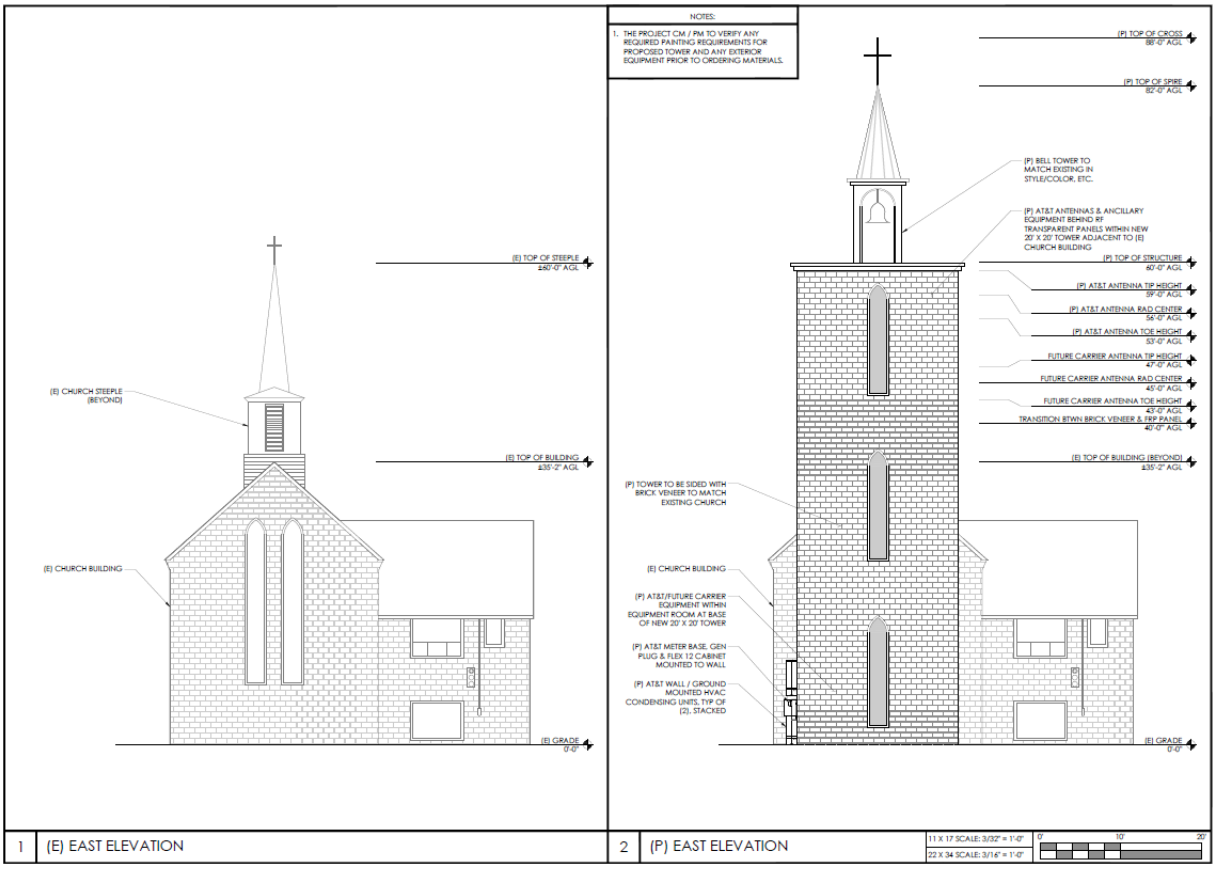

Figure 2. The Proposed New Tower Masked as a Church Bell Tower

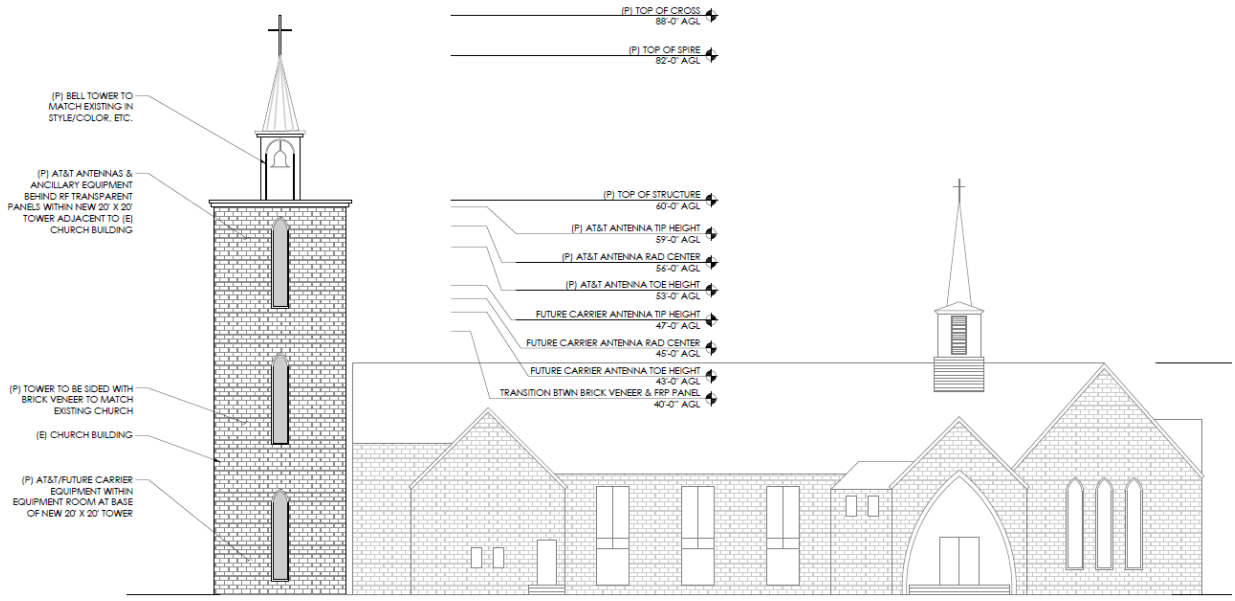

Figure 3. New Tower Adjacent to Existing Church

4 SITE CONDITIONS

4.1 Terrestrial Habitats

Turnstone Ecologist Stephanie James investigated the site on May 26, 2023. The proposed project would occur on a previously disturbed upland area that is currently used as a parking lot with landscaping plants and a sidewalk (Figure 5). Adjacent to the project area is a stream corridor. The riparian habitat is surrounded by urban residential and commercial land uses with high human presence.

The riparian habitat bordering the ditch and project area have an overstory cover dominated by big leaf maple (*Acer macrophyllum*) with minor components of cascara buckthorn (*Rhamnus purshiana*), and beaked hazelnut (*Corylus cornuta*). The understory is predominantly Himalayan blackberry (*Rubus armeniacus*).

Figure 4. Project Site and Adjacent Overstory Vegetation

The riparian habitat corridor adjacent to the project site is fenced and not highly accessible to terrestrial and amphibian wildlife species. The habitats associated with the stream likely provides habitat for common terrestrial mammals such small mammals, such as the Douglas squirrel (*Tamiasciurus douglasii*), Townsend's mole (*Scapanus townsendii*), and Townsend's chipmunk (*Tamias townsendii*). Portions of this site also provide suitable habitat for a number of common avian species, including Swainson's thrush (Catharus ustulatus), dark-eyed junco (*Junco hyemalis*), Wilson's warbler (*Cardellina pusilla*), and western scrub jays (*Aphelocoma californica*).

4.2 Aquatic Habitats

The project site is adjacent to a canal ditch named the Crown Zellerback Power Ditch (#1223935455865), which is a channelized tributary to Lacamas Creek, a tributary to the Columbia River.

Fish, amphibians, and invertebrates are not likely present in this segment of Crown Zellerback Power Ditch. The riparian vegetation bordering the creek provides shade, woody debris, and leaf litter inputs that provide thermal regulation to downstream habitats.

Figure 5. Aerial Photograph of the Proposed Project and Construction Limits

Figure 6. Crown Zellerback Power Ditch

4.3 Wetlands

No wetland delineation for the project site has been conducted. The site does not have any mapped hydric soils; however, the excavated streambed of the Crown Zellerback Power Ditch is mapped as intermittent, seasonally flooded, riverine wetlands (R4SBCx).

5 POTENTIAL IMPACTS TO CRITICAL AREAS

5.1.1 Aquatic Habitat Impacts

No work is planned within the aquatic habitats of the Crown Zellerback Power Ditch and no vegetation removal would occur within the vegetated corridor associated with the ditch. Furthermore, the project would not significantly increase the amount of impervious surface, which could lead to increased run-off. Therefore, the proposed project would not create adverse impacts to aquatic habitats.

5.1.2 Riparian Habitat Area Impacts

Fish and wildlife habitat conservation areas serve physical and biological functions that are valuable to fish and wildlife, providing areas for feeding, breeding, shelter, and migration corridors. Conservation of fish and wildlife habitat promotes and maintains a high level of diversity, clean air and water; erosion control, and supports recreational and commercial fisheries.

The functions and values of the riparian habitat areas adjacent to the project area would be retained, because there would not be any reduction in the vegetative cover within the riparian corridor and the project would not increase the level of human presence in the area. The proposed project would not create adverse impacts to the riparian habitat.

5.1.3 Federal and State Priority and Listed Species

Fish and wildlife conservation areas are areas which, if significantly altered, may reduce the likelihood that the species will reproduce over the long term. Federally-designated species are those identified by U.S. Fish and Wildlife or the National Marine Fisheries Service; whereas, state-designated species are those identified by the Washington Department of Fish and Wildlife. These habitats are designated as critical areas, where endangered, threatened, and sensitive species are verified to have a primary association. No designated critical habitat occurs on the project site.

There are likely no species of local importance, priority species, or endangered, threatened, sensitive, or candidate species with primary association with habitat on or adjacent to the proposed PS25 Camas School Relo project area.

5.1.4 No Net Loss

Project activities would not directly affect the functions, value, or suitability of aquatic habitat, nor would the project indirectly affect aquatic habitat by reducing the amount of overwater shading with the removal of overstory trees. The proposed project would also not adversely modify the suitability and functions of riparian habitat.

6 CONCLUSIONS

This assessment verifies that the proposed project has been designed to comply with the prevailing intent of Section 16.51 of the Camas Municipal Code. To the extent practicable, the project has been designed to avoid and minimize the extent of impacts to critical areas at the site. The project will not result in any net loss of any critical area functions or values.

7 REFERENCES

US Fish and Wildlife Service (USFWS). 2018. Information, Planning, and Conservation System (IPAC) database; accessed on September 12, 2018 at http://ecos.fws.gov/ipac/

Washington Department of Fish and Wildlife (WDFW). 2018. Priority Habitat and Species (PHS) data; accessed on September 13, 2018 at http://wdfw.wa.gov/mapping/phs/.