



**Robert Maul, Planning Manager:
City of Camas, WA**

May 11, 2015

Re: Comments for Hearing on Green Mountain Planned Residential Development & Subdivision
File No. SUB 14-02 (Preliminary Andersen Dairy Concerns, Questions & Comments)

Thank You for meeting with me the other day on Andersen Dairy Concerns on the proposed development. We hope to work with you on this project. The Andersen Dairy has an approximately 1300 acre farm adjacent (in close proximity to a farm) to the proposed development. The part of the farm near the development is located between the Ski Lakes on the southwest side of NE Ingle Road. This private property has been farmed (Agricultural Activities) over 50-years. The Andersen Dairy provides for many jobs in the community over a long time. The Farm has long-term commercial significance in our community. The Growth Management Act & Farmland Protection Policy Act specifies that farm land like the Dairy should be protected. It appears no construction has been proposed for this area along N.E. Ingle Road.

We have reviewed the documents and reports for the development. The application package on a CD-R as we discussed the other day would work. The proposed preliminary plat notes do not have the notification of agricultural farm property next to the proposed development (I believe the County is requiring this on the Plats). We are concerned about the very likely trespassing impacts on the farm from the development as well as the potential negative impacts from increased runoff volumes from the development. The following are our (Rodgers Engineering / Andersen Dairy) comments regarding our concerns and environmental impacts to the farm from this proposal.

The development does not propose a agricultural buffer to mitigate adverse impacts to the farm. The development proposes trails & side walks near the farm. This would provide the opportunity for trespassing onto the farm. Unlawful litter and dumping of solid waste is happening often on the farm. The county nor city may not have an effective way to control this. The proposed development will only significantly increase the adverse impacts to the farm from subdivision along its boundary. The past history and existing condition are numerous residential subdivisions built along its southern boundary of the farm. Residents are trespassing onto the farm property. The illegal activities impacting the farm are the following: trespassing; fire damage; farm operations being disturbed; fences damaged and destroyed; cattle let out of fenced pasture areas; trails being made; shelters being built; damage to farm property; impacts to animals; trespassing sign being damaged or stolen and more. The farm consist of hundred of acres along the southwestern boundary. The City may not have the budget nor the staff to control the illegal adverse impacts to the farm and environment. This is an dangerous situation where possible trespassers are in the same fields with cattle and bulls. .

To mitigate some of these potential adverse impacts to the farm, we are recommending the following: the site and/or Ingle Road is fenced with 6' CLF.; the Right to Farm Act notification to future owner be on the plat or deed; the CC&R's include statement that future owners do not

trespass on the existing farm (Andersen Dairy) private property nor allow people they are legally responsible for to trespass. How will the PUD address these problems? A 6' CLF along the southwest side of NE Ingle Road would help mitigate impacts

Stormwater Report & Plans:

PN: 172557000; 172553000; 173178000

“Stormwater runoff from the site drains across the site in the southwest direction to NE Ingle Road where it is conveyed under the road by several culverts and then discharged to the existing wetlands area west of the road. CMC Title 16 Describe the topography, natural drainage patterns, vegetative ground cover, and presence of critical areas. Critical areas that receive runoff from the site shall be described to a minimum of 1/4 mile away from the site boundary. Site drainage flows to the ditches along Ingles Road. The soils onsite are saturated with perched groundwater therefore wetpond treatment facilities are being proposed combined with shallow detention ponds above the wetpool elevation. Drainage will be discharged to ditches then conveyed under the road and discharge to wetlands. The developer states, No impacts to wetlands is anticipated. The development proposes 25 acres of imperviousness.

Treatment and Detention: The two SWF next to NE Ingle Road will discharge via pipe to the existing wetlands area west of the road and the third facility will discharge to the existing wetland “G” next to the facility. (SW from this wetland will then be captured in a ditch inlet at the downstream end and conveyed via pipe to the wetland west of NE Ingle Road.) All offsite runoff from the north of the site will be captured in a ditch inlet and conveyed via pipe to NE Ingle Rd, where it will also be discharged to the existing wetland. The onsite soils have high groundwater therefore infiltration is not being considered as a viable option for flow control or treatment on this project. GW observed at 6' near SWF only 3' of detention storage

2.5.4 Minimum Requirement #4: Preservation of Natural Drainage Systems & Outfalls:

Natural drainage patterns shall be maintained , and discharges from the project site shall occur at the natural location to the maximum extent practicable. The manner by which runoff is discharged from the project site must not cause a significant adverse impact to downstream receiving waters and downgradient properties. All outfalls require energy dissipation. Prevent erosion of downstream systems. Diversions can cause greater impacts than would otherwise occur by discharging runoff at the natural location. Where no conveyance system exists at the adjacent downgrade property line and the discharge was previously unconcentrated flow or significantly lower concentrated flow, then measures must be taken to prevent downgradient impacts. Drainage easements from downstream property may be needed and should be obtained prior to approval of engineering plans. If adverse impacts to downgradient properties or drainage systems is likely, then a conveyance system must be provided to convey the concentrated runoff across the downstream properties to an acceptable discharge point where things are stable.

PAGE 68

Traffic will increase for the area impacting the roads and close by intersections, how will this be mitigated? Impacts to Ingles & Goodwin Road intersection. In Addition, are the 500 foot plus sign distance being met at access points.

Clark County December 9, 2014 to City of Camas SEPA Official on Green Mountain Development Agreement Modification (SEPA 14-15) Finally, according to section B.8.b.1 of the checklist no measures are proposed to ensure the proposal is compatible with nearby agricultural and forest lands of long-term commercial significance. (Andersen Dairy is presently farms the area southeast of the proposed subdivision and has farmed this area for over 50-years.)

We strongly recommend additional platting information and covenants, conditions and restrictions documentation to notify future residents of the possibility for agricultural management operations on adjacent Agricultural property.

In addition, adequate landscape buffers or open space areas should be incorporated into the planned residential development to buffer future residents from these agricultural management operations. We feel this is the requirement of Growth Management Act as well as addressing potential adverse impacts to this agricultural farm of long-term commercial significance in our community.

RCW 64.06.022 Disclosure of possible proximity to farm: A seller of residential real property shall make available to the buyer the following statement. "This notice is to inform you that the real property you are considering for purchasing may lie in close proximity to a farm. The operation of a farm involves usual and customary agricultural practices, which are protected under RCW 7.48.305, the Washington right to farm act."

We have found the best way to do this is to put a note on the Subdivision Plat for notifications. The notification needs to be in writing this should be in the CCR's for the subdivisions. The buyer will need to be notified in writing of this State Law.

According to **Blue Mountain Community Management Report** an example of the CCR's would address behavior of its residents. Trespassing onto the farm of future residents is a major concern and possible adverse impact to the farm. We highly recommend a 6' chain link fence be constructed as part of the development for this area on the southwest ROW line for NE Ingle Road.

Please Protect Agricultural Farms & frequently flooded areas as required by growth management.

Respectfully Submitted



Bob Rodgers, P.E.
Rodgers Engineering
16019 NE 145th Ave.
Brush Prairie, WA 98606