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**DEPARTMENT OF ENVIRONMENTAL SERVICES**


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December 9, 2014

City of Camas, SEPA Official  
 Community Development Department  
 616 NE Fourth Avenue  
 Camas, WA 98607

**RE: Green Mountain Development Agreement Modification (SEPA14-15)**

To Whom It May Concern:

Thank you for the opportunity to provide input on the aforementioned development agreement and associated future planned residential development. As you are aware, Clark County owns 360 acres of land in the Green Mountain area immediately east of the planned development. These properties are part of the county's Legacy Lands program and were acquired through the Washington Department of Natural Resources' Trust Land Transfer program.

As part of the Legacy Lands program, these properties are managed for sustainable forestry, wildlife habitat, recreation, and open space. The entire 360 acres has been mapped by the Washington Department of Fish and Wildlife as a Biodiversity Area according to the 2008 Priority Habitats and Species List. Much of the property contains a primitive trail network maintained by a local equestrian trail-riding group. In addition, Clark County Environmental Services has developed a comprehensive forest management plan for the properties and certified that management plan under the Forest Stewardship Council's Sustainable Forestry Initiative. Forest thinning operations commenced on these properties as of October 2014.

Green Mountain is also one of the components of Clark County's Conservation Areas Acquisition Plan recently re-adopted by the Board of Clark County Commissioners on March 25<sup>th</sup>, 2014. An excerpt of this plan reads, "...shared priorities for Clark County, Camas, and other partners include expanding and linking the system of parks and open space within the Lacamas Corridor, with special emphasis on trails, shoreline and forestlands as development occurs on the east side of Lacamas Lake. The Regional Trail and Bikeway Systems Plan calls for a Camp Bonneville Trail that extends from the Lacamas Heritage trailhead on Goodwin Road through Green Mountain and into the Camp Bonneville conservation area which is located in the Upper Lacamas Creek subarea. Partners within the Lower Lacamas Creek subarea should explore opportunities to make trail connections to Green Mountain, improve public access, and expand public ownerships to include additional forestlands and high points on Green



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*Mountain. Local partners should support efforts to conserve high value habitat within and adjacent to the Lacamas Prairie Natural Area”.*

*In addition, a specific project opportunity listed in the plan is to “...Acquire 70-100 acres on the west side of county’s Green Mountain Trust Land Transfer ownership, including high points on Green Mountain and trail connections from Camp Currie and Lacamas Heritage Trail.”*

With the planned development abutting the west boundary of Clark County’s Legacy Lands properties, the Department of Environmental Services has the following concerns, comments, and questions:

1) As Green Mountain Land, LLC and the City of Camas move through the planned residential development approval, Clark County would appreciate the opportunity to coordinate permanent trail access to our Legacy Lands properties from the west. A regional trail from Goodwin Road to the top of Green Mountain is strongly encouraged, as well as a connecting trail from the development to the County’s Green Mountain properties. A public overlook on the top of Green Mountain is also encouraged.

Clark County feels that clarification of the contemplated components of the Green Mountain Conceptual Park & Open Space Plan is needed. This conceptual plan does not designate Open Space areas on the steep slopes of Pods G and E-1 from the Conceptual Master Plan, with the exception of an Open Space corridor connecting to the Southwest corner of County owned AP 171493-000. The Conceptual Master Plan does note, however, that 40% of Pod G will be preserved as Open Space. The Park & Open Space Plan should identify specific areas on the steep slopes of Green Mountain to be preserved.

The Park & Open Space Plan also designates a trail along the power line corridor that traverses the LLC property from Goodwin Road up to the main BPA power line corridor. Unfortunately the map scale makes it difficult to discern whether this is proposed as a regional trail or a neighborhood trail. Also trail connections are shown from the corridor through the Open Space between pods G and E-1 to the county-owned parcel and also through pod G to what appears to be the top of Green Mountain. Again it is difficult to discern whether these are contemplated as neighborhood trails or regional trails. As mentioned above, Clark County strongly encourages the development of regional trails in these areas.

2) Considering the fact that Green Mountain is mapped as a Biodiversity Area, it is difficult at this time to understand the scope of impacts on fish and wildlife habitat in the vicinity of Green Mountain. As this planned development moves through the approval process and prepares platting information and covenants, conditions, and restrictions documentation, Clark County strongly encourages including notifications to make future residents aware of the biodiversity area designation and priority wildlife habitat in open spaces and on adjacent county properties.

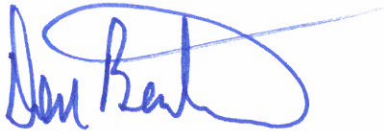
3) As mentioned above, Clark County Environmental Services has developed and certified a comprehensive forest management plan for its properties in the vicinity of Green Mountain and commenced commercial thinning operations as of this year. Considering the county's forestry interests in this area, several components of the Green Mountain Land, LLC SEPA Checklist should be amended. First, in section B.7.b of the checklist, County forest management operations may occasionally generate noise that could be heard on the LLC property and future planned residential development.

Second, according to section B.8.b.1 of the checklist no known working forest lands will affect or will be affected by the planned residential development. As discussed above, County Assessor Parcel #171493-000 is designated FR-2, has a current comprehensive forest management plan and sustainable forestry certification, and forest thinning operations are planned to continue into the future.

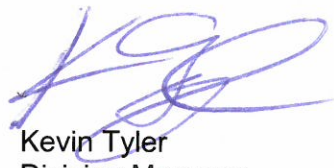
Finally, according to section B.8.b.m of the checklist no measures are proposed to ensure the proposal is compatible with nearby agricultural and forest lands of long-term commercial significance. Clark County strongly recommends additional platting information and covenants, conditions, and restrictions documentation to notify future residents of the possibility for forest management operations on adjacent county properties. In addition, adequate landscape buffers or open space areas should be incorporated into the planned residential development to buffer future residents from these forest management operations.

We appreciate the opportunity to comment on the SEPA Determination of Non-significance and modification to the Development Agreement and look forward to future coordination on this project. If you or the developers of this proposal have any questions regarding these comments, please do not hesitate to get in touch with me.

Sincerely,



Don Benton  
Director of Environmental Services  
Clark County Environmental Services



Kevin Tyler  
Division Manager  
Clark County Environmental Services

