



Director

FOR YOUR INFORMATION
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DEPARTMENT OF ECOLOGY

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June 6, 1988

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This document shows the DOE's concern about "future degradation of lake water quality" and lists the requirements they asked to be added to the permit to safeguard the Lake. It gives context to the meaning of specific words/provisions in the permit.

Dear Mel,

As you know, our office has had numerous meetings and conversations with John White and his staff regarding the Lacamas Shores project. Because this project is now being reprocessed at the local level I wanted to let you know our position and remaining concerns on the issues.

First of all, the May 23rd letter to me from Dorothy Anderson is correct with the addition that monitoring should also include evidence of hydrocarbons. In addition, I have attached a copy of Stan Geiger's letter to me regarding monitoring and contingencies for your information. I will comment on it later.

The developer and his representatives have been extremely cooperative in discussing this project and making changes. The water quality issues involved are all on the periphery of what we know, can document and make predictions from - wetland filtering and allowable inputs to a specific water body. Because of this it is difficult to specify just what a developer can or can't do no matter how cooperative they may be.

Without the specific information needed, as this case, our review is guided by the following language in the Shoreline Management Act (RCW 90.58.020):

It is the policy of the state to provide for the management of the shorelines of the state by planning for and fostering all reasonable and appropriate uses....This policy contemplates protecting against adverse effects to the public health, the land and its vegetation and wildlife, and the waters of the state and their aquatic life,....

With this policy in mind, we want to see the resulting permit with conditions to provide additional protection to the shoreline environment. Some are suggested below.

PUBLIC ACCESS: We have walked the proposed trail location and discussed at length public parking and access to the trail. Our

understanding is that the developer will build the entire length of the trail including the portion on city park property. In addition, he will also construct a graveled parking area on city property similar to that depicted on the revised site plan dated April, 1988. Other access details shown on the April map are acceptable.

The parking area and driveway to it will require a separate shoreline permit to be obtained by the city. (The required fill will also require a Corp permit.)

The approval of this portion of the permit should be conditional on approval of the subsequent permit for parking. If, for some reason, that approval is not forthcoming, other parking arrangements must be made between the developer, the city and ourselves. If such a condition is not provided, we will likely add it to our approval of the Conditional Use permit.

Interior access to the shoreline trail should be provided for residents of the development. Because people tend to create their own trails if not provided, we suggest up to five access easements and trails be provided. They could be located at or near side road intersections with the waterward road. These would also allow better access to trail users in case of an emergency.

Conservancy
Zone shoreline
wetlands

WETLANDS: The existing forested wetland located on the lake should be retained intact as a functioning natural wetland. The stormwater monitoring plan now includes contingencies to divert flows should this wetland show signs of stress from the increased water regime. The vegetative surveys done in monitoring should use permanent transects through the wetland. The site plans should delineate this wetland as separate from the surrounding wetland area.

The Lacamas Shores Biofilter

The emergent wetlands adjacent to the forested wetland will be greatly enlarged by the stormdrainage system. As such we are willing to allow some manipulation of this system to enhance its filtering capacity should future monitoring show such a need.

DOE will allow "manipulation" if need to expand Biofilter's "capacity".

Any such wetland manipulation would require a separate shoreline permit. (Because Camas still needs to adopt its own master program for this area, you may want to address this type of shoreline activity.)

The area below 200 ft elevation adjoining the wetland area is to be held in reserve for future wetland/detention area if needed. Full development of the project may take many years. Full impacts of final buildout may not show up quickly. Consequently you may want to strike the road and five lots located below the

200 ft elevation from the project. Alternatively, you might set a time frame in which to review whether the area needs to be retained or could be developed.

CONTINGENCY IMPLEMENTATION CRITERIA: Potential stormwater impacts to the lake and wetlands has been the most contentious aspect of this project. Stan Geiger's letter sets out the following (summarized) procedure in coming to contingency "trigger":

- 1) Set no trigger criteria during the first year but develop background data.
- 2) Use the first year background data as the basis for setting criteria.
- 3) During the first year discuss appropriate use of the background data to produce meaningful criteria. Most likely these will have to use concentration values (mg/l). Develop the "formula" to convert concentrations into implementation trigger. This will be done in conjunction with IRC and Ecology.
- 4) Implement the trigger criteria at the end of the first year.

Was this ever done?

We believe this procedure to be reasonable given the lack of specific information on loading limits for Lacamas Lake.. We do recommend that the first year sampling be expanded to include phosphorus sampling in relatively undisturbed small streams entering the lake. Phosphorus concentrations are highly variable and this would provide a broader background for looking at possible trigger levels. You should consider adding this as a condition of approval.

We do have reservations about approving the project with the unavoidable lack of specificity on the monitoring triggers. The data presented indicates that the expanded wetland area will be able to handle the potential inputs of the project. However, the consequences of the development exceeding the filtering capacity are great - future degradation of lake water quality and the development of a tightlined offsite stormwater facility.

DOE worried about filter failure - big consequences if the Biofilter

Consequently, we recommend that the project be phased. Lots in the final phase could not be sold until monitoring and trigger levels had established that the system had sufficient capacity to handle the final impacts. Release of the final phase would be approved by the city, IRC and Ecology. It might also allow for renegotiating the monitoring and contingency plans as new information and conditions arise.


Finally, due to the importance of the homeowners' continued maintenance of the storm drainage system, we recommend the

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following to be another condition of approval:

Creation of a homeowners association which will be responsible for monitoring and maintaining the storm drainage system when the developer's responsibility has been completed. These water quality safeguards will be imposed either through a homeowners association charter or deed restriction before conveying title to Lacamas Shores lot buyers.

I hope the preceding comments are helpful. Please call me if you have questions or want clarification. I'll be in the office Tuesday until 1PM. I look forward to seeing the permit when you're done with it. Good luck with your local hearing.

Sincerely,

Nora Jewett
Shoreline Specialist

cc John White
Tom Waltz
Art Larson
Andy McMillan
Allen Miller
Allen Moore
Mike Templeton