



BEND, OR
2777 NW Lolo Drive, Suite 150
Bend, OR 97703
(541) 317-8429
www.aks-eng.com

KEIZER, OR
3700 River Road N, Suite 1
Kelzer, OR 97303
(503) 400-6028

TUALATIN, OR
12965 SW Herman Road, Suite 100
Tualatin, OR 97062
(503) 563-6151

VANCOUVER, WA
9600 NE 126th Avenue, Suite 2520
Vancouver, WA 98682
(360) 882-0419

Date: 4/1/2022
To: Madeline Sutherland, Planner
From: Michael Andreotti, RLA
Project Name: Camas Heights
AKS Job No.: 8468
Project Site: 22630 NE 28th Street, Camas, WA 98607
Subject: Oregon white oak alternative analysis

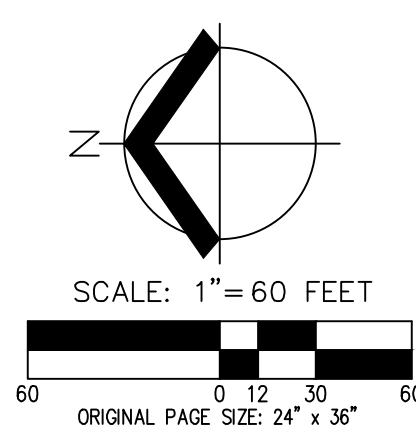
This memo is written to provide additional information for the Oregon white oak alternative analysis.

As shown in EX-1, attached, an alternative layout was considered utilizing cul-de-sacs to try and reduce impacts to critical areas. The alternative was able to reduce impacts to the existing wetland and its buffers but would still have significant impact to oaks. The alternative also creates cul-de-sacs longer than 300 feet and direct pedestrian connections could not be made for circulation, which would not meet CMC 17.19.40.10.b.ii. Additionally, CMC 17.19.040.10.c states that improved site development and circulation solutions shall not be sacrificed to minimize the amount of cut and fill requirements of the proposal. While the code does state that the city engineer may approve deviation from these standards, grading to provide adequate circulation for the development would still create significant impacts to the oaks.

The Washington State Department of Ecology and United States Army Corps of Engineers have also given the projects wetland biologist verbal approval that filling the wetland is acceptable to maintain circulation, safe and efficient emergency vehicle access, and meet code, as it is a low-quality wetland. The wetland avoidance sequencing is discussed in more detail in the Critical Areas Assessment included with the original application package.

The other alternative to save some oaks would be to remove lots from the development. While this option would protect the trees, it would not provide quality oak habitat. If lots are removed, there would be single oaks, except for one pair, surrounded by roads and developed lots. As part of an earlier discussion with the City, the Applicant did agree to turn one lot into an open space tract (shown as Tract L in the attached exhibit) to protect two large oaks, and provide for area to mitigate for oak removal and create more valuable habitat than a single oak would provide. The protection of these oaks works because the grading in that area can be minimized near the oaks, it is a large tract where mitigation can be provided to increase the habitat, and the abutting existing lot has large adjacent open space that provides additional benefit to the habitat. Additionally, this tract is close to Trach H, where additional oak mitigation will be provided.

All the factors above, along with additional habitat mitigation that will be provided in Tract B, per Washington Department of Fish and Wildlife recommendation, surrounding the wetland show that the proposed design will provide a neighborhood that meets City of Camas code, while providing more valuable habitat by mitigating for removed oaks, rather than surrounding individual oaks by development and reducing their habitat value.



**OAK ALTERNATIVE LAYOUT
 CAMAS HEIGHTS
 LENNAR
 CAMAS, WASHINGTON**

JOB NUMBER: 8468
 DATE: 4/1/2022
 DESIGNED BY: MPA
 DRAWN BY: MPA
 CHECKED BY: JMM

AKS DRAWING FILE: 8468_20220331_OAK_ALT_EXHIBITING_LAYOUT.LAYOUT