

May 04, 2022

Madeline Sutherland
City of Camas Community Development
616 NE 4th Avenue
Camas, WA 98607



RE: Camas Height Subdivision (SUB21-01) Exhibit 39 Public Comment Response

Dear Ms. Sutherland:

This letter is in response to public comments submitted for the Camas Heights Subdivision (SUB21-01). This response will specifically address comments in Exhibits 39 and 42. Please place this letter into the record for the Camas Heights Subdivision.

Exhibit 39 – Public Comment from Ken Miles

Exhibits 39 raises multiple concerns regarding the development. The concerns will be addressed individually as numbered in the comment e-mail.

1. The first item raises concerns regarding road grading related to tree protection in Tract F and stormwater BMPs.

To clarify, as it may not be clear on the plans submitted, the Applicant is proposing N Farrell Street, N Garver Street, and N Hollingsworth Street at 12 percent grade. It should also be noted that during the initial layout phase for the project, we considered many different options, including increasing grades above 12 percent. It was determined that increasing the grades above 12 percent would not provide significant relief to grading impacts in the area of Tract F. Therefore, it was determined that street grades not exceeding the maximum allowed by the code was the best option.

The Applicant's engineer understands that preserving existing vegetation is ideal for erosion control and strives to do that when practical. However, as stated above, it was determined not to be practical for this project. While existing vegetation will be removed, erosion control measures will be put in place and the final planting of Tract F will provide erosion protection into the future.

2. The Applicant understands the value of the existing tree, however, with the grading required for the project and the surrounding tree removal in the densely packed stand, the root zone will be significantly impacted, creating a potential hazard for the future homeowners. Therefore, it was determined to remove the tree.
3. The applicant understands that protecting the Oregon white oak habitat is important. However, protecting the existing oaks would create many individual oak trees separated by housing and roads. This is not valuable Oregon white oak habitat. By removing a majority of the Oregon white oak and providing on-site mitigation at a ratio between 3:1 and 5:1 of the existing oak canopy, much more valuable Oak habitat will be created. The Applicant did originally propose to buy mitigation bank credits for the oaks, however, after discussions with the City and the Washington Department of Fish and Wildlife, on-site mitigation solutions were determined to be of better

value. A final mitigation plan will be provided for approval that will include the final proposed on-site mitigation.

4. An alternative layout including long cul-de-sacs was looked at and reviewed by city staff. It was agreed that the alternative was not preferable to the proposed layout, when looking at the development code as a whole.
5. The Applicants' representatives understand the requirements of the tree code and the value of large mature trees, and looked at the preservation option as the first option. As previously stated, multiple different layout options were looked at, and it was determined that other layout alternatives did not provide a better outcome. Additionally, the project arborist evaluated the trees to determine which trees could be protected. The arborist considers factors such as tree health, wind throw potential after development, current and future targets to determine if the tree could become a hazard. With all these things considered, and other code requirements met, it was determined that removing the trees was the best option.

It should also be noted that a majority of the existing trees are clumped in the Northeast corner of the site or in small groups in the southeast portion of the site. With the replanting of over 600 trees, including many new Oregon white oak, the development will spread the tree canopy across the entire site, which will provide better tree coverage in the long term.

6. Tract J will provide a park for the community.
7. Alternative designs were considered and shared with the City. It was agreed that the proposed design is the best alternative. Additionally, the applicant has agreed to provide the Oregon white oak mitigation on site in Tracts M and H, as well as additional mitigation in Tract A as requested by WDFW. The Applicant's natural resources biologist will coordinate with WDFW to provide adequate mitigation, which will prove to be more valuable habitat in the long term.
8. The requested easement would be through the proposed on-site oak mitigation area in Tract H. Any future development on that tract will not be allowed. Additionally, that area is above the 370 elevation, where adequate water pressure is not available, as discussed in the staff report. The development will also provide an extension of the 24" water main in NE 28th Street to the east property line. This line can be extended in the future to provide service to the parcel to the east.
9. Please see the response to Exhibit 25, provided in our initial public comment response, Exhibit 41.
10. We cannot provide comment or be held accountable for trees removed by the adjacent project. We are clearly showing which trees are proposed for removal and which trees are to be protected for this project. During construction of this project, all trees to be protected will be as shown on the plans.

To reiterate, the applicant has looked at many different alternatives for the development and when considering the entirety of the City of Camas code and comprehensive plan, requirements of WDFW, and requirements of all other applicable agencies, it was determined that this was the best alternative for the site. In order to develop this alternative, the Applicant will provide habitat mitigation on site for the Oregon white oak, as well as planting of over 600 trees to meet the City's tree code requirements.



Sincerely,

AKS ENGINEERING & FORESTRY, LLC

A handwritten signature in blue ink, appearing to read 'Michael Andreotti', with a long horizontal flourish extending to the right.

Michael Andreotti, RLA

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