

**From:** Bryce Hanson <BryceH@aks-eng.com>  
**Sent:** Monday, June 18, 2018 4:44 PM  
**To:** Sarah Fox; Community Development Email  
**Cc:** Michael Andreotti  
**Subject:** RE: Camas Urban Tree Program Comments from AKS Engineering & Forestry

Sarah,

Again thanks for letting us provide some feedback for consideration. As stated before, we are happy to see some more definition to the code. Here are some comments/suggestions/question:

1. 3.54.010 B(1) clarify how these acquired areas would be preserved to show the City is being held to the same standard as developers. Will these areas be treated like an off-site mitigation zone for tree planting, education, etc.?
2. 18.03.040 – provide a definition for “hazardous tree”
3. 18.13.025 – I believe you have exemptions for removal of “hazardous street trees” but no exemptions defined for hazardous trees on private sites
4. 18.13.025 (D) a minimum tree density of 30 is still referenced. For consistency, we believe it should be 20.
5. 18.13.045 (B)2(e) – this sounds like you are asking for a partial tree risk analysis... this could turn into requiring a lot of additional work on the initial tree survey, especially for large heavily treed sites. A lot of which may not be necessary. You are also calling out “targets” which implies risk analysis. Perhaps this part of the assessment should only be required for trees that being considered for tree retention areas.
6. 18.13.050(D) – you use “unless otherwise specified” please define where this exception could occur to allow for less than a 30-foot minimum spacing.
7. 18.13.051 (B) – have you updated the Design Standards Manual? Basically we are looking for more clarity on how to calculate the tree density requirements when considering some of the following circumstances:
  - a. Critical areas that have trees (forested wetlands, steep slopes, etc.)
  - b. Critical area buffers
  - c. If you are only developing part of parcel and not touching the rest. (i.e. you want to build on 2 acres of a 10 acre site). Do you have to survey, assess and provide potential mitigation for tree density on the remaining area?
8. 18.13.052 (A) – Please clarify the statement “This may require site redesign”. First of all, who is going to make this determination at the City? It really should be an arborist who is looking at the design from a tree impact/protection standpoint. This scares a lot people because it implies that the City can dictate the exact use of a site rather than allowing the developer to choose how they want to develop the site. And it opens the door for potential liability issues due to the required redesign and retention of trees that otherwise may have been recommended for removal. Basically it leaves a lot of uncertainty as to where the line is drawn for retention.
9. 18.13.052 (B) – Please provide clarity for how these trees will be protected. Do you really want to force them into tracts or can protective covenants work? That way the land use of sites isn’t as affected. Number 5 on the priority list makes it sound like the City is more concerned about trees than public safety. It may be prudent to include additional language that holds public safety paramount to all other factors.
10. Is a report required? Or just the survey (inventory & assessment), which can be addressed with a table on the tree protection/preservation plans?

Feel free to reach out to me if you have any questions regarding my comments.

Thanks,

**Bryce Hanson, PE, LSIT, Certified Arborist**



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