



State of Washington  
**DEPARTMENT OF FISH AND WILDLIFE**  
Southwest Region 5 • 5525 South 11<sup>th</sup> Street, Ridgefield, WA 98642  
Telephone: (360) 696-6211

April 3, 2025

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

Dear SEPA Official:

Thank you for the opportunity to comment on the **SUB24-1002 Camas Woods** project. The Washington Department of Fish and Wildlife (WDFW) has reviewed this proposal and offers the following comments for your consideration.

**Oregon White Oak Woodland**

WDFW considers Oregon white oak (OWO) woodlands to be a type of priority habitat per the agency's [Priority Habitats and Species \(PHS\) List](#). OWO woodlands provide valuable food and habitat for many native Washington animal species, including migratory birds (rufous hummingbirds, band-tailed pigeons, chipping sparrows, and more), nuthatches, woodpeckers, raptors, squirrels, and a wide array of invertebrates, including oak-obligate species. OWOs take decades to reach maturity. Once established, oak trees can live for hundreds of years, providing immense benefits for local ecological communities. WDFW's ["Best management practices for mitigating impacts to Oregon white oak habitat"](#) ("WDFW Oak Guidance") (Nolan & Azerrad 2024) provides guidance for avoiding, minimizing, and mitigating for impacts to OWO woodlands.

The Camas Woods project's "Wetland Buffer Modification & Oak Mitigation Plan" ("Oak Mitigation Plan") prepared by Ecological Land Services, Inc., dated October 21, 2024, identifies four OWO trees within the project site. Impacts to Oak 1 (15-in DBH) will be avoided, but there are plans to remove Oak 2 (5-in DBH), Oak 3 (17-in DBH), and Oak 4 (11-in DBH). Per WDFW's Oak Guidance, mitigation for the removal of Oak 2 will not be necessary due to its small size (less than 6-in DBH), however impacts from the removal of Oaks 3 and 4 should be offset by mitigative measures. Mitigation should be accomplished with both physical mitigation, through the planting of OWO saplings, and temporal mitigation, through the enhancement of existing OWO woodland habitat. The proposed Oak Mitigation Plan explains a strategy to mitigate for OWO impacts by planting OWO saplings as well as transplanting Oak 2. This document references WDFW's OWO Guidance (Nolan & Azerrad 2024) but departs from our agency's recommendations for some elements of the proposed plan.

**OWO Physical Mitigation**

The proposed Oak Mitigation Plan explains that the planting of 150 OWO saplings will be necessary to offset the impacts of removing a 17-in and an 11-in OWO tree (Oaks 3 and 4); this calculation aligns with WDFW's OWO Guidance. The proposed Oak Mitigation Plan also describes a plan to transplant a 5-in OWO tree (Oak 2) within the project site and estimates that this action will achieve the same benefit of planting 25 young oak trees, thereby bringing the physical mitigation requirement down to 125 saplings. Since transplanting a tree within the project site will not provide a net gain for on-site habitat, WDFW does not support the decision to reduce mitigation measures on account of this action. Even if the transplanted 5-in tree had originated off-site, we would not recommend this action as a substitute for the planting of 25 saplings, as transplanting established oak trees is unfortunately rarely successful (rarely resulting in tree survivorship). We do not object to the transplantation of Oak 2, but do not recommend this action as a substitute for other mitigation measures.

The proposed Oak Mitigation Plan explains how many OWO saplings would need to be planted as a physical mitigation measure, specifying that it would be the quantity if ¼-in saplings were planted. This is an accurate reference to WDFW's Oak Mitigation Guidance, which recommends that saplings have stems of at least ¼-in diameter. The Oak Mitigation Plan goes on to explain how many saplings would need to be planted if larger stock were used (Table 8), referencing a large stem equivalency ratio. Notably, WDFW does not support a reduction ratio for larger stock, as larger oak trees, which can become rootbound when grown in containers, cannot necessarily be expected to have enhanced long-term survivorship. Furthermore, planting larger trees with the same spacing (as is proposed by the "equivalent area ratios" in Table 8) could result in overcrowding and eventually tree mortality.

In conclusion, following WDFW's OWO Guidance, the physical mitigation requirement to offset the removal Oaks 3 and 4 should be the planting of 150 OWO saplings.

### **OWO Temporal Mitigation**

The proposed Oak Mitigation Plan explains that the impacts of removing Oaks 3 and 4 should be offset by temporal mitigation in a 5202 sqft area; the steps behind these calculations follow WDFW's Oak Guidance. However, the proposed Oak Mitigation Plan suggests that temporal mitigation be accomplished by planting additional OWO saplings, which is not the intent behind WDFW's guidance. Since oak saplings cannot achieve the same ecosystem functions as mature oak trees for several decades, there will be a temporal lag before habitat functions can be fully restored. WDFW's recommendation is therefore to enhance existing OWO habitat as a means of "temporal mitigation" in addition to the planting of saplings (physical mitigation).

WDFW's Oak Guidance provides suggestions for OWO habitat enhancement measures including the reestablishment of a native understory and canopy release. For the proposed project, there may be opportunity to enhance the habitat surrounding Oak 1 within the project parcel. If this measure is not feasible or would be insufficient in area to fulfill the mitigation requirement, WDFW would support the decision to enhance OWO habitat off site (with a preference for habitats near to the project location). As with the topic of physical mitigation, WDFW does not support the decision to reduce temporal mitigation measures due to the transplantation of Oak 2 within the project site.

### **Snags**

Snags and logs are another category of priority habitat identified on WDFW's Priority Habitats and Species (PHS) list. The project's "Wetland Buffer Modification & Oak Mitigation Plan" indicates two

priority snags on site. Impacts will be avoided for one snag, while the second will be removed and relocated within the project site. WDFW recommends that impacts to snags be avoided whenever possible, but supports the decision to relocate snags within the project site if avoidance is not feasible.

I am happy to provide technical assistance for any questions on selection of native plants and/or measures to protect the Oregon white oaks on site, with the goal of ensuring that this project achieves to net loss of ecological function.

Thank you for the opportunity to provide input.

Sincerely,

A handwritten signature in cursive script that reads "Joy Peplinski".

Joy Peplinski, Habitat Biologist  
Washington Department of Fish & Wildlife