



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

October 30, 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 Landing at Green Mountain 2 (SUB25-1006)** project. The Washington Department of Fish and Wildlife (WDFW) has reviewed this proposal and offers the following comments for your consideration.

Our primary concern for this project is the impact to the critical areas on site, particularly the 28-inch dbh Oregon white oak (OWO) tree proposed for removal. We offer our best management recommendations and most recent guidance for Oregon white oak mitigation.

**Oregon white oaks (OWO)**

As acknowledged in the *Critical Areas Report & Mitigation Plan* ("Mitigation Plan") authored by AshEco Solutions, LLC, on July 1, 2025, WDFW considers Oregon white oak (OWO) woodland to be a type of priority habitat per our agency's [Priority Habitats and Species \(PHS\) List](#), and even a single OWO tree can qualify as OWO woodland habitat if located in an urban or urbanizing area. OWO 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. OWO take decades to reach maturity, and 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 the most current guidance for avoiding, minimizing, and mitigating for impacts to OWO.

We appreciate that the project proponent has identified the presence of five individual Oregon white oak trees onsite, and that, as stated in the Mitigation Plan, they intend to avoid and minimize impacts to the oak trees "to the full extent practicable while still meeting the required design elements." We also commend the decision to consult with an ISA-certified arborist to understand the condition of each tree and the dimensions of each tree's critical root zone and canopy structure. The arborist's observation that Oak #47's root system is intertwined with that of the adjacent Oregon ash trees was a prudent consideration to include in the project plan.

As a point of clarification, the WDFW PHS definition of OWO woodland priority habitat does not specify that an individual tree in an urban or urbanizing area must have a trunk diameter (dbh) of 20 inches or

more in order to be considered particularly valuable to fish and wildlife. It is true that larger trees can often be expected to provide more habitat functions, but we still recommend that the habitat value of smaller trees be considered as well. The WDFW Oak Guidance provides mitigation guidelines for trees with 6-in dbh and above.

#### **OWO Physical Mitigation**

The proposed Mitigation Plan explains that the planting of 50 OWO saplings will be conducted to offset the impact of removing a 28-inch OWO (Oak #47). To align with WDFW guidance for achieving no net loss of OWO function, this calculation would have been increased to 200 OWO saplings: “For trees between 24 - 30 inches dbh, use a tree replacement ratio of 200:1” (pg 18, Nolan & Azerrad 2024). This recommended planting ratio is notably greater than the 10:1 planting ratio referenced in the Mitigation Plan; the lesser ratio was indicated in a past WDFW guidance document (from 1998), but has been updated to the higher replacement ratio indicated in the 2024 WDFW Oak Guidance (Nolan & Azerrad 2024). Again, these updates were made to reflect best available science for the preservation and mitigation of OWO habitat function. We recommend that oak saplings be planted at a density equivalent to 500 saplings/acre or less, and planted alongside oak woodland understory species.

#### **OWO Temporal Mitigation**

Since oak saplings cannot provide the same ecosystem functions as mature oak trees until several decades after planting, there will be a temporal lag before habitat functions can be fully restored after sapling planting. To address this gap, WDFW’s recommendation is to enhance existing OWO habitat as a means of “temporal mitigation”, in addition to planting saplings (“physical mitigation”). WDFW’s Oak Guidance provides suggestions for OWO habitat enhancement measures, including the reestablishment of a native understory and canopy release in pre-existing OWO woodland habitat.

WDFW guidance indicates that OWO habitat enhancement at a 10:1 area ratio (based on canopy area) would be sufficient for temporal mitigation for the loss of a high-functioning OWO tree. Notably, this area calculation is distinct from the area required for oak sapling plantings. Planting and enhancement areas may be located adjacent to each other (and even pieced together in a patchwork scheme), but these areas should not be considered one in the same when determining how much area is necessary for mitigation. Considering these guidelines, a 9900-sqft area may be insufficient for both the physical and temporal mitigation necessary for the removal of Oak #47, which has an 875-ft canopy and will require the planting of 200 saplings (as explained above).

I am happy to provide technical assistance for any questions on selection of native plants and/or additional 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,



Joy Peplinski, Habitat Biologist  
Washington Department of Fish & Wildlife