



State of Washington
DEPARTMENT OF FISH AND WILDLIFE
Southwest Region 5 • 5525 South 11th St Ridgefield, WA 98642
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Robert Maul
Planning Manager
City of Camas

Dear Mr. Maul,

Thank you for the opportunity to comment on the Camas Heights Subdivision project. The Washington Department of Fish and Wildlife (WDFW) has reviewed the proposal and offers the following comments for your consideration.

We are primarily concerned with the impacts of the project on the Oregon white oaks and feel that the plan proposal does not adequately try to avoid and minimize the impacts to these vital species.

Moreover, the preliminary mitigation plan proposal does not account for all spatial and temporal loss derived from Oregon white oak habitat and will lead to a loss in the wildlife habitat functionality.

The “Camas Heights Subdivision – Camas Critical Areas Assessment and Preliminary Mitigation Plan” created by AKS Engineering and dated October 2021 calls for the removal of nine mature Oregon white oaks that range in size from 21 – 43 inches DBH (page 7). Oregon white oaks are considered a priority species because they provide invaluable food and habitat for many native Washington animals, including migratory birds (rufous hummingbirds, band-tailed pigeons, chipping sparrows, and more), nuthatches, woodpeckers, raptors, squirrels, and a wide array of invertebrates, including oak-obligates. Moreover, Oregon white oaks take decades to reach maturity and can live hundreds of years. This means that the ecological functions that old, mature oaks provide will be lost when these individuals are removed and will not be replaced for decades when saplings are planted for mitigation.

I reached out to Madeline Sutherland, a planner with the City of Camas, to learn more about the mitigation plan, and she shared correspondence from the applicant that states on-site mitigation is being considered whereas the Critical Area Report mentions that mitigation will be purchasing bank credits through Terrace Bank. The on-site mitigation consists of preserving two Oregon white oaks on Lot 73 that are 30-inch and 34-inch DBH and I do not know if there is enough available planting space on-site to accommodate for *all* oak plantings based on the recommended 5:1 planting ratio based on canopy lost and the requirements of the City of Camas Municipal Code.

Additionally, the report mentions that there are additional designs that utilize cul-de-sacs and I recommend that the applicant continues to **explore alternative designs to preserve the 43-inch DBH Oregon white oak tree** since a tree of that size could be 200 years old. After reviewing the proposed mitigation for the Camas Heights Subdivision, I do not agree that avoidance and minimization efforts were fully explored prior to creating a development and mitigation plan.

While we understand the concern over the health of some of the trees, the “Camas Heights Subdivision Preliminary Tree Report” shows **only three** Oregon white oaks with a DBH >15 inches that are exhibiting signs of poor health. Moreover, the City of Camas Municipal Code states that Oregon white oaks with a 20-inch or

Page 2

greater DBH are of local importance, *including* Oregon white oak snags unless determined by an arborist to be a hazard. The Critical Areas Report does not refer to the Oregon white oaks on this site that exhibit signs of “poor health” as hazard trees. Thus, the removal of these trees will remove critical habitat features for wildlife, such as cavities for nesting birds, perches, and feeding platforms (WDFW Oregon White Oak Management, page 24).

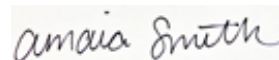
For these reasons, we feel that the proposed mitigation plan does not adequately address the temporal loss of removing old, mature oak trees or for the loss of future snag habitat for native Washington wildlife. I recommend adding mitigation for the three Oregon white oaks that are exhibiting signs of poor health and to enhance the wetlands present on site through the incorporation of snags to mitigate for the critical habitat features that wildlife could potentially use if the Oregon white oaks were left on-site.

In summary, here are my recommendations:

- Explore alternate designs that protect the locally significant Oregon white oaks that are on site, including potential design plans that protect the 43-inch DBH oak tree that is on site if feasible.
- Mitigation plantings that follow the 5:1 planting ratio, based on canopy lost.
- Investigate how many plantings can be incorporated in Lot 73 for on-site mitigation and elsewhere on site. Investigate if plantings can be incorporated in the planting plan.
- Enhance wetland with removed Oregon white oaks, including vertical and horizontal snags.
- Purchase mitigation credits for any mitigation that cannot occur on-site by following the above recommendations.

I am happy to provide biological and technical support while creating a mitigation plan for the Oregon white oaks that are being removed for this project. Please reach out if assistance is needed to ensure that the loss of habitat functionality is being fully mitigation for.

Thank you for considering my recommendations,



Amaia Smith
Habitat Biologist,
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