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**RE: SEPA23-12: Proposed 13th Street Gas Station**

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From Smith, Amaia A (DFW) <Amaia.Smith@dfw.wa.gov>

Date Wed 2/28/2024 4:43 PM

To Yvette Sennewald <YSennewald@cityofcamas.us>

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Hi Yvette,

WDFW recently published a guidance document, [Best management practices for mitigating impacts to Oregon white oak priority habitat](#), that describes the significance of Oregon white oaks and identifies best management practices (BMPs) for avoiding, minimizing, and mitigating impacts to this important habitat and is considered best available science. The actions identified in this guidance document can be implemented under the existing critical areas ordinance is the new standard for evaluating projects that involve Oregon white oak.

This SEPA notice identifies a priority Oregon white oak on site and states it will be removed for this project. WDFW wants to ensure that the project proponent explored design alternatives that avoid and minimize impacts to the Oregon white oak, as required by CMC 16.51.170 – Mitigation sequencing. If impacts to the Oregon white oak cannot be avoided and is subsequently removed for this project, WDFW recommends updating the mitigation to align with our newly published guidance document. A 6:1 mitigation ratio, as proposed, will result in a net-loss of ecological function due to the life history of Oregon white oaks. Furthermore, we recommend that the proponent explores on-site and off-site options prior to purchasing oak credits from a mitigation bank.

Please reach out if there are any questions about our updated guidance document. Additionally, the project proponent can contact me directly if there are questions about our new guidance document.

Thank you,  
Amaia



**Amaia Smith**

(she/her)

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WDFW - Region 5

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360-839-3508

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**From:** Yvette Sennewald <YSennewald@cityofcamas.us>  
**Sent:** Wednesday, February 28, 2024 3:30 PM  
**To:** Smith, Amaia A (DFW) <Amaia.Smith@dfw.wa.gov>  
**Subject:** SEPA23-12: Proposed 13th Street Gas Station

External Email

Hi Amaia,

Just wanted to let you know that I received your phone message regarding the updates for the Oregon White Oak mitigation plan. I look forward to receiving your email with comments and mitigation plan updates.

Thank you,  
Yvette



**Yvette Sennewald, Senior Planner**

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