



State of Washington
DEPARTMENT OF FISH AND WILDLIFE
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August 30, 2024

Attn: Yvette Sennewald
City of Camas – Community Development
616 NE 4th Avenue
Camas, WA 98607

Dear Yvette Sennewald:

Thank you for the opportunity to comment on the **SEPA DNS for the 13th Street Gas Station project (SEPA23-12)**. My predecessor, Amaia Smith, contributed comments via email in February of this year; after reviewing the applicant's revised Oak Bank Use Plan (May 2024), I would like to reiterate her message and provide additional details on WDFW's recommendations based on best available science.

The proposed plan indicates that a large Oregon white oak (OWO) tree growing at the southern edge of the property will be removed. This tree is not only large, with a trunk that is 52 inches diameter at breast height (DBH), it also has high ecological value due to two large cavities which can be used by nesting birds and other types of wildlife. WDFW's Priority Habitats and Species (PHS) List (2023) classifies individual OWO trees of this size (in urban areas) as priority habitats. The Camas Municipal Code (CMC) also classifies individual OWO trees, if they are at least 20-in DBH, as habitats of local importance and thereby a type of fish and wildlife conservation area, per CMC 16.61.010(3). The tree proposed to be removed for this project is more than twice this 20-in threshold value, which highlights the quantity of habitat that this tree currently provides.

Considering the distinct importance of OWO trees to local ecosystems, it is important to ascertain whether all avoidance and minimization alternatives have been thoroughly explored for this project, as is required by CMC 16.51.170 – Mitigation sequencing. If all avoidance and minimization alternatives are deemed unachievable, it is critical to evaluate whether proposed mitigation measures will adequately provide for no net loss of ecological function. When mitigation is necessary, WDFW recommends that project proponents explore on-site or, secondarily, off-site mitigation opportunities before resorting to the purchase of mitigation credits.

The applicant's Critical Areas Report (Oct 2023) and revised Oak Bank Use Plan (May 2024) cite an OWO management document which our agency published in 1998. Notably, our agency published updated guidance on this subject in January 2024: "[Management recommendations for](#)

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Washington's priority habitats: Best management practices for mitigating impacts to Oregon white oak priority habitat" (Nolan & Azerrad 2024). WDFW has recommended that the project proponent update their mitigation plan to align with this updated guidance, which is based on best available science.

WDFW's current OWO mitigation guidance (Nolan & Azerrad 2024) indicates that removal of a high-functioning OWO tree with a 52-in DBH trunk and a 0.08-acre canopy should require **both**:

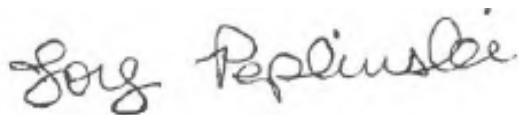
- Physical mitigation in the form of 250 OWO saplings planted
- Temporal mitigation in the form of 0.80 acres of OWO habitat enhanced

By contrast, the proposed mitigation plan provides for only 0.238 acres of oak habitat to be planted/enhanced (via mitigation bank credit). According to the applicant's revised Oak Bank Use Plan, this value is based on a 6:1 mitigation ratio with a 0.5 "risk reduction multiplier", which effectively brings the mitigation ratio to only 3:1. Our agency's best available science indicates that such efforts would fall short of accomplishing no net loss of ecological function.

Finally, WDFW recommends that any trees felled in the course of construction be retained on the property or moved to nearby woodland habitat. Dead snags and logs provide valuable habitat to cavity-nesting birds and mammals, which is why WDFW's PHS List identifies snags and logs as a type of priority habitat. CMC 16.61.010(3) also classifies OWO snags as habitats of local importance and thereby a type of fish and wildlife conservation area.

Please feel free reach out if there are any questions about our updated OWO mitigation guidance document. Additionally, the project proponent can contact me directly with questions about this guidance.

Thank you,



Joy Peplinski
Habitat Biologist
Washington Department of Fish & Wildlife