



State of Washington  
**DEPARTMENT OF FISH AND WILDLIFE**  
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May 8, 2015

Robert Maul  
Planning Manager, City of Camas  
616 NE 4th Avenue  
Camas, WA 98607

**RE: Follow-up to Comments on Green Mountain Planned Residential Development**

Dear Mr. Maul:

The Washington Department of Fish and Wildlife (WDFW) submitted a comment letter dated March 17, 2015, drawing attention to Oregon white oak woodlands, the Green Mountain Biodiversity Area, Townsend's big-eared bat, Bradshaw's lomatium, and wetlands at the site of the proposed Green Mountain Planned Residential Development. Since then we have been in contact with the staff of Ecological Land Services, Inc. (ELS), and have had fruitful discussions around these issues. We received a copy of the ELS letter dated May 5, 2015, and offer this letter as an update to our ongoing discussions.

In general we are in agreement with the findings and conceptual mitigation strategy presented in the May 5, 2015 ELS letter. While some fine-tuning of the particulars of the mitigation may still be appropriate, we feel that adequate opportunity exists on the site to successfully mitigate for the impacts of Phase 1. Future phases of the overall master plan will also need to be analyzed in greater detail as appropriate. WDFW supports the concept of advance mitigation to help offset impacts of future phases.

Oregon White Oak Woodlands

*Oak Establishment and Preservation/Enhancement Areas*

The Oregon white oak mitigation strategy presented in the May 5, 2015, ELS letter will, over time, replace the oak habitat removed for Phase 1. The methods of calculation, ratios applied, and targeted tree densities are consistent with suggestions made by WDFW. The strategy provides opportunity to determine some of the details of implementation at a later date; WDFW would greatly appreciate being a party to those future planning efforts.

*Advance Oak Mitigation*

WDFW supports the concept of advance mitigation to help offset impacts of future phases. We look forward to continuing discussions of this strategy (including appropriate ratios for trees outside of the active golf course) with project proponents.

Green Mountain Biodiversity Area

WDFW concurs that the portion of the Green Mountain Biodiversity Area that is mapped in the northern portion of Phase 1 does not actually meet the definition of a biodiversity area. Other portions of the overall master plan include areas that likely do meet the definition. As noted in the ELS letter, WDFW requests that project proponents consult with us to assess mapped biodiversity areas outside of Phase 1 prior to developing subsequent phases.

Townsend's Big-Eared Bat

WDFW concurs that Phase 1 does not support caves/hibernaculums for Townsend's big-eared bat. Other portions of the overall master plan may include such areas. As noted in the ELS letter, WDFW requests that project proponents consult with us to assess potential Townsend's big-eared bat habitat prior to developing subsequent phases.

Bradshaw's Lomatium

While this plant has been found in the vicinity, WDFW concurs that suitable habitat is not likely to occur within the project boundary.

Wetlands

WDFW appreciates the clarification in the ELS letter regarding wetland ratings and disturbance minimization measures.

We thank you for the opportunity to provide further input. Please contact me should you have any questions or need additional information.

Sincerely,



George Fornes, Habitat Biologist  
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cc: Dave Howe, WDFW Region 5 Habitat Program Manager  
Keith Folkerts, WDFW Land Use Policy Lead  
Francis Naglich, Ecological Land Services, Inc.  
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