

**Lauren Hollenbeck**

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**From:** Francis Naglich <Francis@eco-land.com>  
**Sent:** Friday, April 24, 2015 4:15 PM  
**To:** Robert Maul  
**Cc:** george.fornes@dfw.wa.gov; John Schmidt (john.schmidt@metlandgroup.com); John O'Neil (john@metlandgroup.com); Randall B. Printz (randy.printz@landerholm.com); Mara McGrath  
**Subject:** Update on WDFW Comments and Responses, Green Mountain PRD and Phase 1 Proposed Development

Hello Robert,

Ecological Land Services, Inc. (ELS) met with WDFW Habitat Biologist George Fornes on April 22, 2015 regarding several habitat items related to the proposed Green Mountain Planned Residential Development, including the preliminary plat for Phase 1..

Below you will find a short summary of those discussions. Over the next week we are going to finish preparing a letter (the draft is 7-8 pages long) that addresses in detail each of the items in the WDFW's 3/17/15 letter. Based on the very productive discussion we had with George and the suggestions he was able to provide, we are confident that WDFW will be able to support the mitigation measures identified in the letter. We will send the letter to George for his review prior to sending it to the City. The letter will be a combination of facts, clarifications, and mitigation measures. To simplify the drafting of the City' staff report and conditions of approval, the draft staff report could perhaps simply say "Applicant to meet all mitigation measures provided for in the letter from ELS dated..."

**Oregon White Oak Habitat**

After meeting with George Wednesday, ELS is preparing a revised oak habitat mitigation plan for the Phase 1 development impacts to oak trees and potential habitat. Mitigation ratios were the main focus of the discussion and we are confident that a revised plan will satisfy George's questions and concerns regarding oak habitat mitigation. The plan will involve greater mitigation than is required by either Camas City Code or the Tree Preservation Plan in the DA. ELS anticipates a condition of approval stating that such a detailed plan will be required. Based upon the conditions provided for in the letter, a detailed mitigation plan with exact planting areas, maintenance plan, monitoring provisions, and legal protection will then be provided to the City concurrently with the City's review of the civil engineering plans and prior to construction.

We also discussed with George the overall PRD master plan and potential impacts and mitigation for oak habitat in future phases of the development. All parties agreed that an advanced oak mitigation plan for future phases was a good idea. A conceptual advanced mitigation plan will also be presented in the forthcoming letter.

**Green Mountain Biodiversity Area**

The young, deciduous forested area in the northern part of Phase 1, which is mapped as within the Green Mountain Biodiversity Area, doesn't meet the definition of Biodiversity Area. George concurred based on his aerial photo analysis. However, the section of the PRD to the north and outside of Phase 1 is forested and is mapped as within the Green Mountain Biodiversity Area. This forested section of the PRD will need further investigation and analysis to determine its status. We discussed assessing the forested area with WDFW and ELS biologists at a later date prior to any development of that area.

**Townsend's Big-eared Bat**

The developable portions of Phase 1 do not contain topography suitable for caves. George's main concern was potential habitat outside of the Phase 1 project area, but within the PRD. This area will need to be surveyed by WDFW and ELS biologists prior to any development in the potential habitat area.

### **Bradshaw's Lomatium**

The documented Bradshaw's lomatium is outside the boundaries of Phase 1 and the PRD. The closest known location is about 0.25 miles from the nearest PRD boundary. George didn't believe that there was suitable habitat within Phase 1 or the PRD for the lomatium, concurring with findings by ELS biologists and onsite maintenance staff knowledgeable about plants.

### **Wetlands**

#### *Wetland Rating*

George concurred that use of Ecology's 2004 rating was appropriate as the *Critical Areas Report* was submitted on December 31, 2014.

#### *Wetland Buffer Reduction with Enhancement*

ELS provided text to supplement the Dec 2014 *Critical Areas Report* that explains how *CCC 16.54.050(C)(1)(a)* and *(b)* would be met. George advised that we check with the City about any typical design elements for *CCC 16.53.050(C)(1)(a) Lower Impact Land Uses*.

Let me know if you have any questions or concerns. Thanks and have a good weekend!

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