



State of Washington  
DEPARTMENT OF FISH AND WILDLIFE

Southwest Region 5 • 5525 South 11<sup>th</sup> St Ridgefield, WA 98642 Telephone: (360) 696-6211 • Fax: (360) 906-6776

January 23, 2023

City of Camas, SEPA Official  
Community Development Department  
616 NE Fourth Avenue  
Camas, WA 98607

To Whom It May Concern,

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

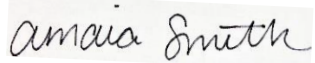
**WDFW appreciates how the development setback aligns with the Critical Area Ordinance for the City of Camas. However, WDFW recommends using Site Potential Tree Height of 200 years (SPTH200) for assessing environmental impacts which would implement a setback of 215 feet versus 150 feet. Furthermore, WDFW appreciates that impacts to the Oregon white oaks are avoided in this proposal.**

WDFW recently released new riparian management recommendations, *Riparian Ecosystems, Volume 1: Science Synthesis and Management Implications* (Quinn et al. 2020) and *Riparian Ecosystems, Volume 2: Management Recommendations* (Rentz et al. 2020). In the new riparian management recommendations, WDFW no longer has a set buffer width for fish and non-fish bearing streams and instead bases it on the Site Potential Tree Height of 200 years (SPTH200) to ensure the riparian ecosystem has the greatest functionality. These ecological functions outlined in *Riparian Ecosystems, Volume 1: Science Synthesis and Management Implications* (Quinn et al. 2020) include, but are not limited to: stream morphology, erosion and sedimentation process, fish and wildlife habitat availability, wood recruitment, stream temperature, shading, pollutant removal, and nutrient cycling.

While this development follows the current shoreline setback of 150 feet, WDFW recommends assessing all impacts within 215ft to determine if there are impacts to the riparian area and ecological functions. Furthermore, WDFW recognizes that there are no proposed impacts to the Oregon white oak woodlands on site and appreciates that efforts were made to avoid impacts to this priority habitat.

Thank you for allowing WDFW to comment and I hope that you will consider all riparian impacts within 215 feet to be mitigated for in order to achieve no net loss of ecological function.

Thank you,

A handwritten signature in cursive script that reads "Amaia Smith". The signature is written in black ink on a light-colored background.

Amaia Smith Habitat Biologist  
Washington Dept of Fish and Wildlife  
5525 South 11th St. Ridgefield, WA

Cc: Maddie Nolan, Acting Regional Habitat Program Manager