State of Washington
DEPARTMENT OF FISH AND WILDLIFE
Southwest Region 5 • 5525 South 11th Street, Ridgefield, WA 98642
Telephone: (360) 696-6211

May 21, 2026

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

Dear SEPA Official:

Thank you for the opportunity to comment on the **Oliver Terrace Subdivision (SUB25-1010)** proposal. The Washington Department of Fish and Wildlife (WDFW) has reviewed this proposal and offers the following comments for your consideration.

Our primary concern with this proposal regards impacts to the riparian area within the project site. We recommend increasing Stream A's riparian buffer to account for Site-Potential Tree Height at 200 Years (SPTH200), which is a guideline supported by the most current science (Quinn et al. 2020, Rentz et al. 2020). We also offer best management practices to **avoid impacts to priority Oregon white oak and snag habitat**.

Riparian Area

Riparian areas are considered a type of priority habitat per WDFW's Priority Habitats and Species (PHS) List. WDFW has published riparian ecosystem 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). Riparian ecological functions include, but are not limited to: stream morphology evolution, erosion and sedimentation processes, fish and wildlife habitat production, wood recruitment, water temperature stabilization, shading, pollutant removal, and nutrient cycling (Quinn et al. 2020). WDFW recommends that riparian buffers be sized based on Site Potential Tree Height at 200 years (SPTH200) to ensure that riparian ecosystems can maintain high functionality. These recommendations apply to all riparian areas and do not depend on a stream's fish-bearing status or seasonality.

The Critical Areas Report (CAR), prepared by Ecological Land Services (ELS) on June 16, 2025, documents the presence of a seasonal, non-fish-bearing (Type Ns) stream (Stream A) within the project site. The proposed buffer width for Stream A is 25 ft. **WDFW recommends that this buffer be expanded to 215 feet**, corresponding to the height of a mature Douglas fir in this soil type. WDFW recommends that riparian buffers be, **at minimum, 100 ft** in order to accomplish pollutant removal from runoff before it flows into the waterway.

Oregon White Oaks

The CAR documents two Oregon white oak (OWO) trees in the southwestern corner of the project site. OWO woodlands are a type of priority habitat per WDFW's PHS List, and even single OWO trees in urban areas can be considered priority habitat. OWO woodlands provide valuable food and habitat resources for many types of native Washington wildlife, including migratory birds (rufous hummingbirds, band-tailed pigeons, chipping sparrows, and more), nuthatches, woodpeckers, raptors, squirrels, and a wide array of invertebrates, including oak-obligate species. OWOs take decades to reach maturity, but once established, OWOs can live for hundreds of years, providing immense benefits for local ecological communities. In 2024, WDFW published guidance for avoiding, minimizing, and mitigating impacts to OWO*: Best management practices for mitigating impacts to Oregon white oak priority habitat* (Nolan & Azerrad 2024).

The CAR explains that while there is no current plan to remove the OWO trees, were that plan to change, the trees would not be large enough to be protected by Camas Municipal Code. WDFW recommends mitigation for the removal of OWO trees that are 6-in DBH or greater. The trees within project area, which measure 12 and 15-in DBH, do meet this threshold indicated by WDFW's guidance (Nolan & Azerrad 2024). The best way to ensure no net loss of ecological function is to preserve established habitat, so **WDFW strongly recommends that the plan to preserve these oak trees be maintained.**

A helpful resource for project proponents is this publication from the Oregon State University Extension Service: *Tree Protection Construction and Development Sites: A Best Management Practices Guidebook for the Pacific Northwest* (2009). If the health of an OWO tree declines during or after construction, we recommend consulting with an ISA-certified arborist to strategize means to help the tree recover.

Priority Snags

Snags, which are dead or dying trees, are priority habitat features per WDFW's PHS List. Snags provide nesting and foraging habitat for a wide variety of native wildlife species. The CAR documents the presence of two priority snag within the riparian area of Stream A. WDFW commends the decision to avoid all impacts to these features.

Thank you for the opportunity to provide input on this proposal. We are available to provide technical assistance upon request regarding minimizing impacts to riparian areas, Oregon white oak woodlands, priority snags, and other topics.

Sincerely,

Joy Peplinski

Joy Peplinski, Habitat Biologist
Washington Department of Fish & Wildlife