



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

November 20, 2025

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 **SUB25-1008: Village at North Shore** project. The Washington Department of Fish and Wildlife (WDFW) has reviewed this proposal and offers the following comments for your consideration.

Our primary concerns for this project are the impacts to the critical areas on site, including the riparian area, herbaceous bald habitat, and the Oregon white oak (OWO) trees proposed for removal. We offer our most up to date recommendations for determining riparian management zones for streams and guidance for Oregon white oak mitigation.

Riparian Habitat

In 2020, WDFW published updated 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). WDFW recommends that riparian buffers be sized based on Site Potential Tree Height at 200 years (SPTH200) to ensure the ecosystem maintains the greatest functionality. Riparian ecological functions include, but are not limited to: stream morphology evolution, erosion and sedimentation processes, fish and wildlife habitat availability, wood recruitment, stream temperature stabilization, shading, pollutant removal, and nutrient cycling (Quinn et al. 2020). These new recommendations do not differentiate between buffer sizing for non-fish and fish-bearing streams because they all connect to and impact one another. This is particularly true for the transport of nutrients and pollutants, which are easily moved by water.

The site plan for this project notes that the riparian buffer for "Stream A" was reduced from 110 ft to 82.5 ft per CMC 16.53.050(C)(1). The SPTH200 where Stream A is located is 225 ft, corresponding to the height of mature Douglas-fir. Accordingly, **we recommend that a 225-ft riparian buffer, and at minimum, a 100-ft buffer** should be implemented. A buffer width of 100 feet or more could be expected to achieve the target of 95% pollution removal for most pollutants. The 225-ft buffer corresponding to SPTH200 could be expected to preserve all ecological functions and thereby meet the goal of ensuring no net loss of ecological function.

Herbaceous Balds

The project proponent has identified two herbaceous balds on site, as documented in the Critical Areas Report (“CAR”) prepared by Ecological Land Services (ELS) in May 2025, as well as their Wetland Buffer Modification & Mitigation Plan (“Mitigation Plan”) prepared by ELS in July 2025. As referenced in these reports, WDFW considers herbaceous balds to be a type of priority habitat per our agency’s [Priority Habitats and Species \(PHS\) List](#). Additionally, the Washington Department of Natural Resources Natural Heritage Program classifies the conservation status of North Pacific Herbaceous Bald & Bluffs as “vulnerable” (Rocchio & Crawford 2015). The unique morphology of herbaceous balds, which is based on a shallow soil layer, results in these habitats supporting a high diversity of plant species that are often distinct from the surrounding woodland landscape. This habitat and vegetation heterogeneity is critical for supporting a diversity of animal life, including invertebrate pollinators, which have evolved to specialize in this habitat niche. We commend the consultant for identifying this lesser-known but critical habitat.

The unique geological and biological features of herbaceous balds make these habitat conditions exceedingly difficult, or arguably impossible, to replicate. For this reason, avoidance of impacts to these habitats is likely the only way to ensure no net loss of ecological function. We support the applicant’s proposal to avoid impacts to the herbaceous bald near “Oak Cluster 1” and part of the bald near “Oak Cluster 2”, and to install fencing, educational signage, and establish a conservation covenant or similar protective mechanism around these areas. Additionally, **we strongly advise that all alternatives be considered that could route construction away from the entirety of the herbaceous bald near “Oak Cluster 2”**.

If impacts to all herbaceous bald areas cannot be entirely avoided, as we advise, further discussion will be necessary to determine how such impacts could be adequately addressed through compensatory mitigation. Enhancement of the remaining herbaceous bald habitats, including the removal of invasive species, would be beneficial to these habitats, but such enhancement at a ratio of 1:1 for lost habitat would not be sufficient to prevent loss of ecological function. Furthermore, area enhanced as a means of mitigating for the loss of herbaceous bald habitat should not also be counted as a means of mitigating for loss of oak habitat. WDFW is available for further consultation regarding both avoidance and mitigation.

Oregon White Oak Woodlands

The project proponent has identified two clusters of Oregon white oaks (OWO), consisting of 20 trees, within the project site. As referenced in the CAR and Mitigation Plan, WDFW considers Oregon white oak (OWO) woodlands to be a type of priority habitat even a single OWO tree can qualify as OWO woodland habitat if located in an urban or urbanizing area. We support the decision to retain five of these trees but advise that the project proponent consider alternatives to avoid impacts to all OWOs on site, especially since they coincide with herbaceous bald habitat.

WDFW’s [Best management practices for mitigating impacts to Oregon white oak habitat](#) (“WDFW Oak Guidance”) (Nolan & Azerrad 2024) provides guidance for avoiding, minimizing, and mitigating for impacts to OWO. We commend the project proponent for following the mitigation sequence outlined in the WDFW Oak Guidance by proposing a nuanced plan for both physical and temporal mitigation, with a focus on conducting habitat enhancement (temporal mitigation) on site.

The Mitigation Plan describes a strategy to enhance the remaining habitat via the removal of invasive species and installation of native species appropriate to both OWO and herbaceous bald vegetation communities. WDFW supports this approach to tailor the planting plan to this unique habitat, which is distinct from other OWO woodlands.

We advise that precautions be taken to avoid and minimize impacts to the oak trees' root systems during construction, especially the construction of North Shore Blvd. The Oregon State University Extension Service offers a useful resource on this topic: [Tree Protection Construction and Development Sites: A Best Management Practices Guidebook for the Pacific Northwest](#) (OSU 2009). We also recommend consultation with an ISA-certified arborist if any of the trees show declining health post-construction.

WDFW assistance is available upon request for guidance on avoiding and minimizing impacts to priority habitats and species, including herbaceous balds and OWO habitat.

Sincerely,

A handwritten signature in dark ink, reading "Joy Peplinski". The signature is written in a cursive, flowing style.

Joy Peplinski, Habitat Biologist
Washington Department of Fish & Wildlife