



State of Washington  
DEPARTMENT OF FISH AND WILDLIFE

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Telephone: (360) 696-6211

June 17, 2025

City of La Center  
Community Development  
210 E 4<sup>th</sup> St  
La Center, WA 98629

Dear Angie Merrill:

Thank you for the opportunity to comment on the proposed **City of La Center Public Works Operation Center #2025-010** project. The Washington Department of Fish and Wildlife (WDFW) has reviewed this proposal and offers the following comments for your consideration.

Our primary concern is the potential impact to critical areas on site, **particularly the riparian management zone (RMZ) of the mapped Type Ns (non-fish bearing, seasonal) stream identified on parcel #986053994**. WDFW recommends riparian management zone (RMZ) widths based on Site Potential Tree Height at 200 Years (SPTH200). If SPTH200 cannot be implemented, we recommend confirming the fish-bearing status since La Center's critical area ordinance is based on fish-bearing status. DNR's watertyping webmap shows the fish bearing/non-fish bearing break is immediately downstream of the subject parcel. Due to the proximity to the project area, we recommend confirming the fish bearing/non-fish bearing break to ensure the proper riparian buffer is used.

Additional considerations are outlined below.

**Site Potential Tree Height (SPTH200)**

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 no longer recommends varied riparian buffers for fish and non-fish bearing streams. Instead, WDFW recommends a width based 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.

Our new recommendations do not differentiate between non-fish and fish bearing streams because they are all connected to and impact one another. This is particularly true for the transport of nutrients and pollutants, which are easily moved by water. For the subject parcel, **the SPTH is 215 ft**, corresponding to the height of mature Douglas-fir. If a 215 ft riparian buffer cannot be implemented, we

recommend a minimum **100 ft buffer**. While a reduced riparian buffer would not preserve all ecological functions, **a buffer width of 100 feet or more** could be expected to achieve the target of 95% pollution removal for most pollutants, though a larger buffer is strongly recommended.

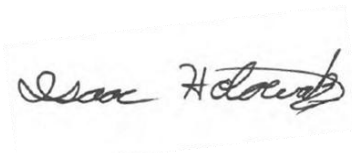
If SPTH200 cannot be implemented and the riparian buffers follow those outlined in Table 18.300.090(2)(f) – Riparian Areas, we recommend confirming the location of the fish/non-fish bearing break since the modeled break is immediately downstream of this project area. WDFW staff are available to provide technical assistance. If this break has been confirmed during previous efforts, that information will be helpful in evaluating riparian impacts.

**Riparian Buffer Enhancement and Compensatory Mitigation**

Additionally, the “Recommended Enhancement Mitigation Planting List” included in the *Critical Areas and Mitigation Report* authored by HHPR dated May 2025, proposes a mitigation ratio of 1.5:1 to compensate for both the temporary and permanent impacts to the riparian management zone. While the 1.5:1 mitigation ratio for temporary impacts to the RMZ may be adequate to offset temporary impacts, we are concerned that this ratio will not offset the permanent impacts to the riparian habitat.

La Center’s Municipal Code 18.300.090(2)(m)(iv) describes the enhancement standards for vegetative buffer enhancement and states, “The enhanced area shall be of equal or greater habitat value(s) based on best available science”. With SPTH200 being a form of best of available science, additional information is needed on the existing riparian habitat to determine adequate mitigation for the physical loss of habitat. For this reason, **we recommend increasing the mitigation ratio for permanent impacts to the RMZ to ensure no net loss of function.**

Thank you for the opportunity to provide input. Please contact me if there are any follow-up questions or need additional information.

A handwritten signature in black ink, reading "Isaac Holowatz", is enclosed in a light gray rectangular box. The signature is written in a cursive, flowing style.

Isaac Holowatz, Habitat Biologist  
Washington Department of Fish & Wildlife