

September 11, 2026

Walla Walla Planning Commission
City of Walla Walla
Walla Walla, Washington

RE: Proposed Updates to Critical Areas Ordinances

Dear Members of the Walla Walla Planning Commission:

We recognize that the Washington State Growth Management Act requires jurisdictions to periodically review and update their critical areas regulations. We appreciate the city's work to meet these requirements while balancing environmental protections with the needs of property owners, builders, and the broader community.

As the city moves forward with these changes, we respectfully ask the Planning Commission and City Council to consider delaying implementation of the updated Critical Areas Ordinances until the end of the year. Providing additional time before the new regulations take effect would allow builders, developers, property owners, and other affected stakeholders to better understand the changes, evaluate their impacts on existing and planned projects, and adjust accordingly. A reasonable transition period can help prevent unnecessary disruptions to projects already in the planning or development process.

We would also like to raise concerns regarding the Washington Department of Fish and Wildlife's recommendation for a 100-foot buffer under its Best Available Science guidance. We understand and support the importance of protecting critical areas and fish and wildlife habitat. However, it is also important to recognize that WDFW's proposed buffer is a recommendation rather than a statewide mandate requiring the city to adopt a 100-foot standard.

The difference between a 75-foot and 100-foot buffer can be significant for individual properties and development projects. Increasing these setbacks can affect usable lot area, lot configurations, development feasibility, and ultimately the number of homes that can be constructed. At a time when communities throughout Washington are working to increase housing supply and improve housing affordability, we believe these impacts deserve careful consideration.

We encourage the city to evaluate the approaches being taken by other local jurisdictions when determining what standards are appropriate for Walla Walla. For example, the City of Kennewick's draft critical areas regulations associated with its Comprehensive Plan update continue to utilize 75-foot buffers for fish-bearing streams and 50-foot buffers for non-fish-

bearing streams. This demonstrates that communities can consider Best Available Science while developing regulations that reflect local conditions and balance environmental protection with housing and development needs.

The Home Builders Association of Tri-Cities and Walla Walla supports responsible growth and appropriate environmental stewardship. At the same time, we believe regulations should be locally appropriate and carefully evaluated for their potential effects on housing availability, property rights, and development feasibility.

We respectfully ask the Planning Commission to consider both of our requests as it reviews the proposed ordinance: provide a transition period by delaying implementation until the end of 2026, and carefully evaluate whether a 100-foot buffer is necessary and appropriate for Walla Walla rather than adopting the WDFW recommendation without consideration of reasonable local alternatives.

Sincerely,

Bailee Butcher

Executive Director/CEO

Home Builders Association of Tri-Cities and Walla Walla