

Members of the City of Walla Walla Planning Commission and City Council:

I'd like to raise a concern about the stream buffer standards currently being proposed by Washington State Fish & Wildlife as part of the current review of the City and County Critical Area Ordinances — not to argue against protecting our waterways, but to encourage more complete framing of what this policy proposal actually represents. I have attached a copy of WDFW's own explanation of it's proposed policy, **2025 Riparian Management Zones Map: A User Guide for Local Governments from WDFW's Priority Habitats and Species Program**, as published on the WDFW web site.

As proposed, the required buffer on both sides of all streams, creeks, as well as man made, seasonal irrigation water features that dry up after the season, will be SPTH200, the height of a native 200 year old tree, determined by WDFW to be 100', which represents a 50' to 65' increase to previously established standards. The proposed standard, SPTH200, the presumed height of a native 200 year old tree, is described as if it were a precise, scientifically derived measurement of the "correct" buffer width for every stream. In reality, it apparently primarily originated from a study of specific streams in the wet, sloped, forested Cascade and Coast Ranges of Oregon and Washington. While being genuinely useful information — it's a description of conditions in one type of forest ecosystem, not a general formula proving that a buffer must equal exactly one specific tree height to protect a stream in every ecosystem in Washington State. In addition, when there is no nearby 200 year old tree that reaches 100', WDFW proposes that the default buffer width becomes 100' anyway. Not exactly site specific nor science-informed.

Even WDFW's own guidance acknowledges this nuance: the agency states that Volume 2 of its riparian ecosystems report represents policy recommendations based on the science, **not the science itself**. WDFW is transparent that applying SPTH200 as a regulatory standard is **a policy choice**— a conservative, protective one, but a choice nonetheless.

This willingness to go beyond strict scientific consensus is visible elsewhere in WDFW's own recent guidance. In its 2025 Riparian Management Zones Map user guide, the agency states plainly that it recommends protecting the entire stream network — **including non-fish-bearing streams** — because it **found no science justifying weaker protection for those streams**, and it explicitly acknowledges that this recommendation **departs from widespread practice elsewhere of applying narrower buffers to non-fish-bearing streams**. Once again, not exactly site specific nor science-informed.

I raise this not to criticize the recommendation itself, but to highlight that WDFW is properly transparent in stating that its own proposed standard is a policy judgment that goes beyond, and diverges from, common practice — not a settled scientific consensus that other jurisdictions have simply failed to catch up to.

I'd also note that the tree-height method was primarily developed in wet, sloped, forested landscapes in the western part of the state. Applying it uniformly to different ecological settings — drier regions, different soil types, different topography, different vegetation communities — extends a coastal-forest-derived standard well beyond the conditions it was originally studied in, without independent validation on those drier settings affected.

Conservative, protective buffers are reasonable public policy, especially for salmon recovery and water quality. But I'd ask that our local planning materials and public discussions describe and consider SPTH200 accurately: as a policy choice with a specific origin and scope — one that the issuing agency itself acknowledges departs from common practice in places — not as an unambiguous scientific fact. That distinction matters, because it affects how much flexibility should be built into local ordinances for site-specific review, alternative mitigation, or variance requests — flexibility that's harder to justify if the standard is presented as scientifically absolute rather than as a reasonable-but-debatable policy judgment.

I would also ask that such policy discussions include consideration of non-scientific issues such as private property rights, compensation for property designated as a needed buffer zone, and relief from the ongoing imposition of property taxes on property taken for use as such buffer zones.

Thank you for your attention to this matter.

Dave Campbell

 Check our [wildfire information page \(/about/wdfw-lands/wildfire\)](/about/wdfw-lands/wildfire) for fire restrictions and wildfire-related closures before you visit WDFW-managed lands.



Washington Department of
FISH & WILDLIFE

2025 Riparian Management Zones Map: A User Guide for Local Governments from WDFW's Priority Habitats and Species Program

Category:

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Overview

Riparian areas occupy the transition zone that begins at the stream's edge and extends upland. These areas provide habitat to an estimated 85% of Washington's terrestrial vertebrate species, and riparian vegetation provides critical ecosystem functions that support and protect instream health. Protection of these areas is especially important for salmon recovery efforts, and other decision-making affecting threatened or endangered species. For these reasons, WDFW identifies riparian habitat as a Priority Habitat and recommends that local governments designate and protect Riparian Management Zones (RMZs) as a Fish and Wildlife Habitat Conservation Area (FWHCA), a type of critical area under the Growth Management Act.

After extensive review of available evidence, WDFW identified a method to define the upland RMZ boundary according to the lateral distance over which essential riparian functions are provided. This Site Potential Tree Height at 200 years (SPTH_{200yr}) is the estimated average height attained by dominant trees in that location after 200 years of growth. In addition to serving directly as shelter and sustenance to many species, trees contribute shade, leaf litter, and large woody debris to streams; they also reduce pollutants, attenuate destructive overbank flooding, and enhance many forms of recreation along watercourses. In addition to these functions, intact RMZs also provide direct benefits to surrounding communities by filtering pollutants, stabilizing streambanks, reducing flooding, and supporting overall watershed resilience. Tree height therefore provides a generalized yet flexible means to estimate the distance over which riparian functions are provided.

The SPTH_{200yr} estimate is obtained by identifying the tallest species of tree growing in the area and the soil type. The RMZ's width is a distance of one SPTH_{200yr} measured from the stream's bankfull width, active floodplain, or outer edge of the channel migration zone (CMZ), whichever is wider. In places where tree height is less than 100 feet, the RMZ width is set to a minimum distance of 100 feet to account for the pollutant removal function provided by RMZs. As described in Riparian Ecosystems Volumes 1 and 2, a 100-foot RMZ typically provides 95% pollution removal for phosphorus, sediment, most pesticides, and approximately 85% for surface nitrogen. Because we found no science that justified lesser protections for non-fish-bearing streams, we recommend that RMZ protections be provided to the entire stream network – this is a departure from widespread practice of protecting a narrower RMZ for non-fish-bearing streams.

The PHS RMZ map is intended to provide local jurisdictions with estimated locations of RMZs delineated based on a SPTH_{200yr} standard to support the designation and protection of critical areas. The map was created using best available scientific data estimating stream locations, likely tree species, and the maximum tree height at 200 years for streams across all of Washington. *The map represents estimated locations only and site-scale delineation of an RMZ critical area requires field verification.*

Suggested citation

Folkerts K, K. Muir, J. Michalak. 2025. PHS Local Government User Guide: 2025 Riparian Management Zones Map. Habitat Program, Washington Department of Fish and Wildlife, Olympia.