

9/14/2026

Re: Proposed Critical Areas Ordinance Amendments

Dear Council Members and Commissioners,

I support the City's efforts to protect critical areas and the environmental functions they provide. My concern is with establishing a blanket 100-foot minimum buffer without adequately considering site-specific conditions and the significant impacts this change could have on individual properties.

The City has indicated that the proposed amendments are based on Best Available Science. I believe it is important to distinguish between the scientific recommendations and the City's decision to establish a uniform 100-foot development restriction.

WDFW's methodology recognizes that riparian areas should be evaluated based on site-specific conditions, including vegetation, soils, topography, and habitat functions. Property owners should have an opportunity to demonstrate the appropriate buffer based on the actual conditions present on their property.

Impact on Existing Homes and Property Owners

The City should also consider the impact on existing homes and homeowners, not just future development. A new 100-foot buffer could significantly restrict reasonable improvements such as additions, remodels, garages, accessibility improvements, and other necessary changes.

A homeowner who purchased property under the existing regulations should not unexpectedly lose a substantial portion of the property's reasonable ability to be improved simply because the regulations have changed.

Citywide Housing and Growth Impacts

The City should also evaluate the cumulative impact of a 100-foot buffer across Walla Walla. With numerous waterways and areas potentially affected by critical-area regulations, this requirement could affect a significant amount of otherwise developable residential land.

This could conflict with City goals for residential density, infill development, affordable housing, avoiding urban sprawl, and efficient use of existing streets and utilities. Protecting critical areas and accommodating growth should not be viewed as competing objectives.

Notice to Affected Property Owners

I own a vacant parcel that is substantially affected by the proposed 100-foot requirement. I only became aware of the proposed change about a month ago and learned about it through another individual rather than through direct communication from the City.

I understand that the City has provided public notice through its established process. However, with the City intending to adopt the ordinance in October, affected property owners have very limited time to understand the proposal, evaluate its impact, obtain professional advice, and meaningfully participate.

I respectfully ask the City to identify properties that may be substantially affected and provide those owners with additional notice and a reasonable opportunity to participate before the ordinance is finalized.

Property and Development Impacts

The proposed requirement could have significant consequences for property rights, housing, lot configuration, development costs, and project feasibility.

On my property, the proposed change could materially alter the development potential and configuration, potentially resulting in the loss of 15 residential lots and threatening the economic viability of the project.

I believe there are reasonable alternatives that could achieve the City's environmental objectives while providing greater flexibility, including:

- Site-specific buffer determinations;
- Buffer averaging;
- Mitigation where appropriate;
- Reasonable provisions for improvements to existing homes; and
- Protections for projects that have already vested or made substantial investments under existing regulations.

Request for Additional Review and Time

I respectfully request that the Planning Commission not recommend adoption of the blanket 100-foot minimum without additional review.

I am not asking the City to weaken environmental protection. I am asking the City to ensure that the regulations follow the science, allow for site-specific evaluation, provide meaningful notice to affected property owners, and balance environmental protection with the impacts on private property, existing homeowners, housing, and development feasibility.

Thank you for your consideration.

Sincerely,

A handwritten signature in dark ink, appearing to read "Travis Watts", with a stylized, flowing script.

Travis Watts
3437 Powerline Road
Walla Walla, WA 99362
509.386.0955