



City of Tenino Planning Commission Development Regulations Update

To City of Tenino Planning Commission
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Project: Comprehensive Plan Periodic Update
Subject Development Regulations Code Update

Summary

At the Commission's request, staff reviewed how jurisdictions address building materials and riparian buffers in environmentally sensitive areas. Tenino's current regulations do not specify building materials based on environmental sensitivity, relying instead on buffers, land use standards, and best management practices, which is consistent with most Washington jurisdictions. Where material standards exist elsewhere, they are typically performance-based, tied to environmental outcomes such as water quality and erosion control, and applied through shoreline programs, overlays, or permit conditions rather than prescriptive material lists. For riparian buffers, most jurisdictions continue to use fixed distances for administrative predictability, though some are evaluating Site Potential Tree Height (SPTH) as part of best available science. Tenino's average SPTH is approximately 199 feet, providing local context for comparing SPTH-based outcomes to fixed buffer options.

The questions that were asked at the December meeting were:

- Does the City regulate building materials in Environmental Residential Zone, if not then do other jurisdictions regulate this? What would that entail?
- How other jurisdictions are approaching riparian buffers in Critical Areas Ordinance updates, specifically whether they are using Site Potential Tree Height (SPTH) or fixed buffer distances (for example, 150 feet).
- What the Site Potential Tree Height values look like locally in Tenino, to understand how SPTH would function in practice.
- Administrative implications of SPTH-based buffers versus fixed buffers, including who bears responsibility for analysis and reporting.
- Whether Ecology or Commerce expresses a preference for SPTH versus fixed buffers.

Building Material Regulation in Sensitive Areas

At the Commission's request, this memo provides background information on how some jurisdictions address building materials in environmentally or ecologically sensitive areas, and how those approaches are typically structured. This information is intended to support policy discussion and does not propose specific changes to the City's regulations.

Existing Approach in Tenino

Currently, the City's development regulations, including zoning and critical areas provisions, do not regulate specific building materials based solely on environmental sensitivity. Instead, they focus on:

- Land use and density
- Setbacks and buffers
- Protection of critical areas and their functions
- Construction timing, mitigation sequencing, and best management practices

This approach is consistent with how most Washington jurisdictions implement critical areas regulations.

How Other Jurisdictions Address Building Materials

While uncommon, some jurisdictions do regulate or condition building materials in sensitive areas when those requirements are directly tied to environmental protection outcomes. These approaches generally avoid aesthetic regulation and instead focus on performance and impacts.

Examples from other jurisdictions include:

- Limiting impervious surfaces and requiring permeable or infiltrative materials in environmentally sensitive areas.
- Restricting materials known to harm water quality or habitat, particularly near shorelines or streams.
- Requiring exterior materials that reduce erosion, glare, heat, or pollutant runoff.
- Conditioning materials through permit review rather than prohibiting development outright.

In Washington, Shoreline Master Programs are the most common local framework where material-related standards are explicitly applied to protect aquatic resources.

Common Layout Options Used by Jurisdictions

Jurisdictions that incorporate material considerations typically do so using one or more of the following regulatory layouts:

Option 1: Performance-Based Standards

Materials are regulated based on measurable environmental outcomes, such as permeability, toxicity, reflectivity, or erosion potential, rather than naming specific products.

Option 2: Environmental Overlay Zones

Additional standards apply only in mapped environmentally sensitive areas and may include limits on impervious surfaces or restrictions on materials that generate runoff or pollutants.

Option 3: Permit-Level Conditions

Material considerations are addressed during project review through conditions of approval, allowing site-specific tailoring based on environmental constraints.

Option 4: Shoreline or Watershed Regulations

Material standards are applied within shoreline jurisdiction or priority watersheds to protect water quality and habitat, separate from underlying zoning.

Key Observations

- Material regulations are most defensible when clearly tied to environmental protection rather than design preference.
- Jurisdictions generally favor flexibility through performance standards and permit conditions rather than prescriptive material lists.
- Any consideration of materials is typically limited in scope and applied only where environmental sensitivity warrants additional protection.

Approaches to Habitat Conservation Area Buffers

There are two broad approaches jurisdictions are considering for riparian/HCA buffer standards:

Site Potential Tree Height (SPTH)-Based Buffers

This approach uses tree height predictions to calculate buffer extents such as WDFW's recommended SPTH200 (one 200-year site potential tree height from water's edge). SPTH-based buffers are highly variable and tied to local ecological potential.

- The City of Shoreline explicitly referenced use of the WDFW SPTH200 method in its 2025 CAO amendments discussion and sought to balance it with urban development patterns.

Several other jurisdictions are evaluating or considering SPTH-informed riparian protections in draft code updates (e.g., Puyallup in its CAO update materials noted SPTH considerations tied to baseline buffer proposals).

What are the administrative implications?

SPTH-based approach

- May require site-specific analysis where mapped data is insufficient
- Typically places responsibility on the applicant to provide SPTH verification
- Increases permitting cost and review time
- Requires clear standards for report preparation and review

Fixed Buffer Distances

Alternatively, some jurisdictions adopt set buffer distances where they find fixed riparian widths more appropriate or administratively predictable:

- Puyallup’s draft standard during its CAO update proposes a fixed baseline riparian buffer (e.g., 100 feet for many stream types) with potential hybrid options that may exceed fixed distances when warranted.

Other jurisdictions use fixed widths guided by local conditions, with potential BAS justification or hybrid approaches (combining fixed minimums with SPTH where appropriate).

What are the administrative implications?

Fixed buffer approach

- Buffer widths are mapped and known in advance
- Limited need for site-specific technical analysis
- Lower cost and complexity for applicants
- Easier to administer with existing staff resources

Other Local Jurisdictions

Jurisdiction	CAO Update Status (2025-2026)
Thurston County	Actively drafting a CAO rewrite; not yet adopted (2026 target)
City of Olympia	Preliminary review as part of Comp Plan update (2026 target)
City of Lacey	Draft CAO periodic update in progress (SEPA DNS issued)
City of Tumwater	No clear public update noted in last 12 months (status unchanged)
City of Yelm	No notable CAO updates identified
Lewis County	CAO adopted, kept current regulations

City of Tenino – SPTH Context

As part of our local analysis, Tenino’s average Site Potential Tree Height (SPTH) is 199 feet. This suggests that if a riparian buffer were scoped using a 200-year SPTH approach, the average recommended buffer would be



approximately 199 feet. This aligns closely with WDFW’s SPTH200 concept and would compare favorably with other urban or mixed rural context jurisdictions considering SPTH-based protections.