



# WETLAND BUFFER RATING SCALE

## AN ISSUE BRIEF BY THE MASTER BUILDERS ASSOCIATION OF KING AND SNOHOMISH COUNTIES

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### BACKGROUND:

Washington State environmental regulations are designed to minimize development impacts to wetlands through established buffers that consider habitat, water quality, and hydrologic functions. Historically, the Washington State Department of Ecology (Ecology) provides guidance on buffer widths and scoring systems, and ratios for compensatory mitigation through its “Wetland Guidance for CAO Updates” document, which local jurisdictions use to establish and update local code for critical areas regulations.

### PROBLEM:

The Department of Ecology Wetland Rating System for Western WA: 2014 Update effective January 1, 2015, was intended to simplify the previous 2004 System. However, many developments in local Puget Sound area jurisdictions have experienced increased buffer widths on comparable development sites since implementation of the 2014 update. In some jurisdictions for example, what had been a Category IV wetland with a 50-foot buffer under the 2004 guidelines was rated as a Category III wetland with a 150-foot buffer under the 2014 guidelines.

The updated 2014 guidelines reflect less gradient across habitat scores with the range now between 4-9 as compared to the 2004 guidelines with a range between 9-27, which in turn changed the range of scores identified as low, moderate, or high habitat. These clustered habitat scores are used in many jurisdictions to determine final wetland buffers, based on their usage of Ecology guidance. This becomes problematic when evaluating habitat, water quality, and hydrologic functions. While some questions within the rating system are more or less problematic than others, the PHS Values to Society Section, and 303D Water Quality Value evaluation metrics can quickly, artificially elevate the score, shifting a Category IV wetland to a Category III, thus inappropriately increasing the buffer width. Ecology noted that some of these changes in category may be accurately reflecting a more appropriate category/rating of a particular wetland. However, the shift in the range of habitat scores was identified as a primary concern to ensure the rating system is accurately reflecting the science behind the wetland rating system.

### SOLUTION:

Ecology conducted a detailed analysis of reference wetland data used to calibrate the rating system. The agency found wetlands scoring 3, 4, and 5 points for habitat are more similarly distributed to those scoring  $\leq 19$ , where it was previously only 3-4 points. To maintain similar habitat score distributions between the 2004 and 2014 versions of the Washington State Wetland Rating System, the following guidance change has been implemented effective immediately.



**The habitat score break points in the current wetland buffer tables has been modified to now group scores 3, 4, and 5 into low habitat function and scores of 6 and 7 into moderate habitat function. No change was made to those scores for high habitat function.**

The MBA recommends use of the modified wetland buffer tables in critical areas updates. Depending on an individual jurisdiction's circumstances, use of the modified tables could be considered through an administrative decision, as recommended by Ecology.

For example, Snohomish County will immediately begin processing applications using the new scoring system and soon adopt either a rule or code interpretation regarding the guidance.

Reference: July 2018 modified habitat score ranges  
<https://ecology.wa.gov/Water-Shorelines/Wetlands/Regulations/Local-regulations>