

ADDENDUM

To the City of Bellevue Critical Areas Regulations Technical Report Gap Analysis

The Watershed Company and Golder prepared a Gap Analysis for the City of Bellevue’s Critical Areas Regulations, dated August 2016. This addendum clarifies the recommendations pertaining to buffer widths included in Part 6 of the Gap Analysis.

All recommendations in Table 6-1 of the Gap Analysis still apply, including use of the 2014 wetland rating system and updating of the buffer table to account for the revised range of scoring scales in the 2014 wetland rating system.

The Gap Analysis noted that standard wetland buffer widths in the existing code are generally consistent with those proposed by Ecology. The major difference between the existing code and the Ecology guidance cited in the Gap Analysis is that Ecology’s guidance graduated the buffer widths for moderate habitat scores (scores of 5-7) into two groups, where a score of 5 would result in a 105-foot buffer and a score of 6-7 would result in a 165-foot buffer (Based on Wetland Guidance for CAO Updates Western Washington Version, Ecology 2016).

The rationale for splitting out buffer widths for moderate habitat scores was based on the significant (115-foot) difference in buffer width resulting from a difference of one point between a habitat score of 7 and a score of 8 when scores are grouped into three categories (Table 1). In Wetlands in Washington State- Volume 2 (Updated in 2014), Ecology suggests that, “Such a large increase in width with a one-point increase in the habitat score may be contentious.”

Table 1. Standard buffer widths consistent with Ecology guidance based on three habitat score categories

Wetland Category and Type	Buffer width (in feet) based on habitat score		
	3-4	5-7	8-9
I: Bogs and wetlands of high conservation value	190		225
I: All others	75	110	225
II	75	110	225
III	60	110	225
IV	40		

Although a more graduated approach to buffers is recommended to avoid this potentially contentious issue in implementation, local jurisdictions may adopt either the graduated or the more discretely grouped buffers. We recommend that the City of Bellevue consider the option to adopt a more graduated buffer approach in the future, but this is not a necessary update to comply with Ecology guidance or best available science.