BUFFER AVERAGING PLAN

MORIARTY

APRIL 2025

Soundview Consultants
Environmental Assessment
Planning + Land Use Solutions

BUFFER AVERAGING PLAN

MORIARTY

APRIL 15, 2025

PROJECT LOCATION
EAST-ADJACENT TO:
3415 SOUTH 356TH STREET
AUBURN, WASHINGTON 98001

PREPARED FOR
CONNER HOMES
12600 SOUTHEAST 38TH STREET
BELLEVUE, WASHINGTON 98006

PREPARED BY
SOUNDVIEW CONSULTANTS LLC
2907 HARBORVIEW DRIVE
GIG HARBOR, WASHINGTON 98335
(253) 514-8952

Soundview Consultants
Environmental Assessment
Planning + Land Use Solutions

Executive Summary

Soundview Consultants LLC (SVC) has been assisting Conner Homes (Applicant) with a Buffer Averaging Plan to assist with planning for a proposed residential development on a 4.73-acre site located east-adjacent to 3415 South 356th Street within the Auburn area of unincorporated King County, Washington. The subject property is situated in Section 27, Township 21 North, Range 4 East, N.W. (King County Parcel Number 404570-0610).

SVC investigated the subject property for the presence of potentially regulated wetlands, waterbodies, and fish and wildlife habitat in June of 2021 and May of 2022. The site investigations identified one potentially-regulated wetland (Wetland A) on the subject property. Wetland A is classified as Category III wetland with a low habitat score of 5 points per King County Code (KCC) 21A.24.318. Category III wetlands with low habitat scores in areas of proposed high land uses are subject to standard 80-foot buffers per KCC 21A.24.325.A.1, which can be administratively reduced to 60 feet with the use of mitigation measures per KCC 21A.24.325.C.6.b. No other potentially-regulated wetlands, waterbodies, fish and wildlife habitat, or priority species were identified within 300 feet of the subject property during the site investigations.

The Applicant proposes to develop a residential subdivision on the subject property that will include 28 single-family residential lots, access roads, wet and dry utilities, open space, and stormwater infrastructure. The project was carefully designed to fully utilize the developable upland area onsite, and all permanent impacts are avoided. However, in order to provide enough space for the stormwater infrastructure and recreational open space requirements onsite, the project will require minor buffer averaging associated with Wetland A, as allowed per KCC 21.A.24.325.B. The proposed buffer averaging plan will result in 2,104-square feet of buffer decrease along the western Wetland A buffer and will result in 2,283-square feet of buffer increase along the southern Wetland A buffer, to ensure not net loss in functional buffer area and provide an increase of 179-square feet. The project will result in no net loss in ecological functions.

The table below identifies the onsite critical areas and summarizes the potential regulatory status by local, state, and federal agencies.

Feature Name	Size (Onsite)	Category[1]	Regulated Under KCC Chapter 21A.24	Regulated Under RCW 90.48	Regulated Under Clean Water Act
Wetland A	2,324 SF	III	Yes	Yes	Presumed

Notes:
1. Current Washington State Department of Ecology (WSDOE) wetland rating system (Hruby, 2014) per KCC 21A.24.318

The table below summarizes the proposed wetland and wetland buffer impacts.

Type of Impact	Impact Area
Buffer Reduction	2,104 SF

The table below summarizes the proposed buffer restoration to offset the proposed critical area impacts.

Mitigation Type	Mitigation Area
Buffer Increase	2,283 SF

Site Map

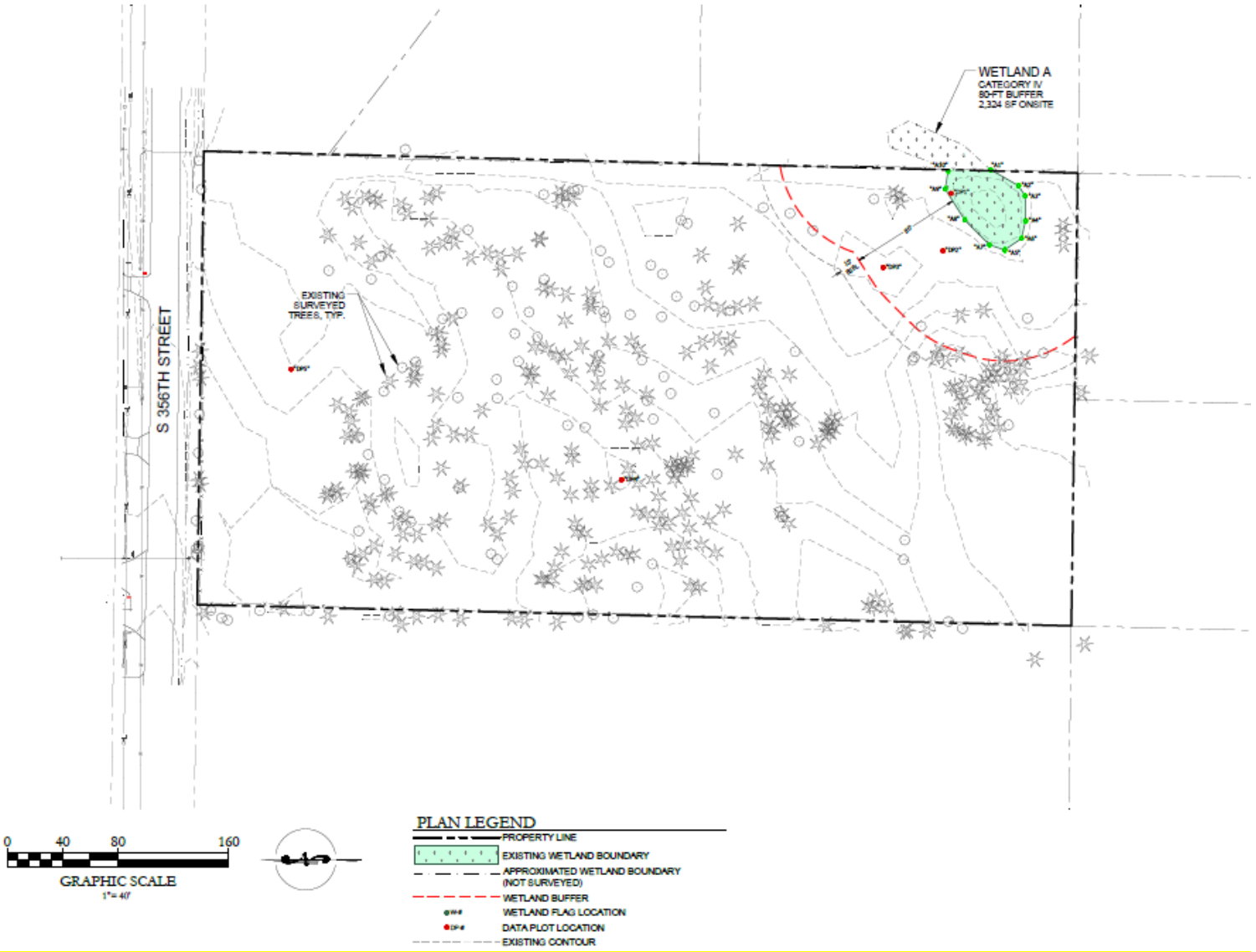

WETLAND A
CATEGORY IV
80-FT BUFFER
2,324 SF ONSITE
EXISTING SURVEYED TREES, TYP.
S 356TH STREET
0
40
80
160
GRAPHIC SCALE
1"= 40'
PLAN LEGEND
PROPERTY LINE
EXISTING WETLAND BOUNDARY
APPROXIMATED WETLAND BOUNDARY (NOT SURVEYED)
WETLAND BUFFER
WETLAND FLAG LOCATION
DATA PLOT LOCATION
EXISTING CONTOUR

Table of Contents

Appendices

Chapter 1. Regulatory Considerations

SVC's site investigations in June 2021 and May 2022 identified one potentially-regulated wetland (Wetland A) on the subject property. No other potentially-regulated wetlands, waterbodies, fish and wildlife habitat, or priority species were identified within 300 feet of the subject property during the site investigations.

1.1 Local Regulations

1.1.1 Critical Area Buffers

KCC 21A.24.325 has adopted the current wetland rating system used by WSDOE. Category III wetlands are wetlands with a moderate level of functions, as characterized by a score ranging from 16 to 19 points. Generally, these wetlands have been disturbed in some ways and are often less diverse or more isolated from other natural resources in the landscape than Category II wetlands. Wetland A is classified as Category III wetland which is subject to a standard 80-foot buffer based on the proposed high intensity land use per KCC 21A.24.325.A.1. However, the buffer width for wetlands within a high intensity land use zone may be reduced to moderate intensity impacts if the project implements minimization measures identified per KCC 21A.24.325.C.6.b and presented in Table 4 below. As such, the buffer for Wetland A may be reduced to 60 feet if minimization measures are implemented.

1.1.2 Mitigation Sequencing

The proposed project includes necessary buffer modification. Under KCC 21A.24.125, projects should first attempt to avoid impacts all together by not taking certain actions. If actions cannot be eliminated, impacts should be minimized by restraining the magnitude of an action, using different technology or by taking steps to avoid, reduce, repair, rehabilitate, or restore impacts. For impacts that cannot be avoided or minimized, compensation or rectification for the impact should be provided by replacing, enhancing, or providing substitute resources or environments, followed by monitoring and reduction of the impact over time. Mitigation sequencing for impacts to critical areas is as follows:

1. *Avoiding the impact or hazard by not taking a certain action;*

   The Applicant is proposing single-family residential development of the site to include 28 single-family lots, utilities, roadways, and associated infrastructure. The project was carefully designed to fully utilize the developable upland area onsite, and all permanent impacts are avoided. However, in order to provide enough space for the required stormwater infrastructure and recreational open space, the project will require minor buffer averaging associated with Wetland A, as allowed per KCC 21.A.24.325.B to avoid direct impacts to Wetland A. To avoid impacts, all appropriate best management practices (BMPs) and temporary erosion and sediment control (TESC) measures will be implemented throughout the course of construction.

2. *Minimizing impacts or hazards by limiting the degree or magnitude of the action with appropriate technology; or taking affirmative steps, such as project redesign, relocation or timing;*

   As described above, the buffer averaging for Wetland A is necessary and unavoidable to accommodate stormwater infrastructure and recreational open space. There are no other sites in the vicinity that are available to the Applicant that would result in less impacts to critical areas, as

all sites in the immediate area are already fully developed or are also equally encumbered with critical areas. Minimization measures include placing the lower intensity portions of the development such as stormwater infrastructure and open space adjacent to the wetland and the higher intensity uses such as the residential lots and roadway further from the wetland.

3. *Rectifying the impact to critical areas by repairing, rehabilitating or restoring the affected critical area or its buffer;*

Given that no impacts are proposed, no mitigation is required. The proposed wetland buffer averaging will not result in a loss of buffer area.

4. *Minimizing or eliminating the hazard by restoring or stabilizing the hazard area through engineered or other methods;*

Not applicable

5. *Reducing or eliminating the impact or hazard over time by preservation or maintenance operations during the life of the development proposal or alteration;*

The remaining onsite critical areas and associated buffers onsite will be protected via a critical areas tract, conservation easement, or other protective mechanism acceptable by King County to limit development in perpetuity. In addition, critical areas fencing and signage will be placed around the remaining critical areas post-development to limit intrusion into the areas as required per KCC 21A.24.160.

6. *Compensating for the adverse impact by enhancing critical areas and their buffers or creating substitute critical areas and their buffers;*

The proposed wetland buffer averaging will result in a net gain of 179 square feet of contiguous, functional buffer area.

7. *Monitoring the impact, hazard or success of required mitigation and taking remedial action.*

No monitoring will be required for the proposed project as no onsite mitigation actions are proposed beyond the installation of critical areas fencing and signage.

1.1.3 Wetland Buffer Averaging

The project was carefully designed to fully utilize the developable upland areas onsite. However, in order to provide enough space for the stormwater and recreational facilities onsite, the project will require minor buffer averaging of the buffer associated with Wetland A, as allowed per KCC 21.A.24.325.B to avoid direct wetland impacts. Minor buffer decrease will occur along the northern portion of the buffer to allow for adequate space for stormwater infrastructure and recreation facilities. Per KCC 21A.24.325.B.2, wetland buffer averaging is allowed when the following criteria are met:

1. *The total area of the buffer after averaging is equivalent to or greater than the area of the buffer before averaging; and*

Approximately 2,104-square feet of wetland buffer decrease will be offset by 2,283-square feet of buffer increase, resulting in a net gain of 179-square feet in buffer area.

2. *The additional buffer is contiguous with the standard buffer; and*

   The buffer increase will be contiguous with the existing buffer along the southern portion of Wetland A.

3. *The buffer at its narrowest point is never less than either seventy-five percent of the required width or seventy-five feet for Category I and II, fifty feet for Category III, and twenty-five feet for Category IV, whichever is greater ; and*

   The buffer at its narrowest point will not be less than 60 feet.

4. *The averaged buffer will not result in degradation of wetland functions and values as demonstrated by a critical areas report from a qualified wetland professional; and*

   The averaged buffer will not result in degradation of wetland functions and values. The existing buffer associated with Wetland A primarily consists of unmaintained lawn, non-native invasive Himalayan blackberry (*Rubus armeniacus*), and forested patches. The proposed buffer averaging will decrease the wetland buffer along the northern edge within areas of primarily Himalayan blackberry, leaving the majority of the intact forested buffer area to provide adequate screening and protection from the development. The buffer averaging will provide a no net loss in buffer area and will provide an increase in contiguous buffer area by 179 square feet. To avoid impacts, all appropriate best management practices (BMPs) and temporary erosion and sediment control (TESC) measures will be implemented throughout the course of construction.

5. *The buffer is increased adjacent to the higher functioning area of habitat or more sensitive portion of the wetland and decreased adjacent to the lower-functioning or less-sensitive portion as demonstrated by a critical areas report from a qualified wetland professional.*

   The entire existing onsite buffer area associated with Wetland A consists of forested areas, unmaintained lawn, and areas dominated by non-native invasive Himalayan blackberry. Wetland A continues offsite to the east and the buffer in the offsite portion to the northeast currently consists of bare ground from recent disturbances. To allow for adequate space to install stormwater infrastructure and recreational facilities onsite, the buffer will be decreased along the northern portion of Wetland A. The buffer increase will occur along the southern portion adjacent to the remaining higher-functioning areas of habitat.

1.2 State and Federal Considerations

On January 18, 2023, USACE and EPA published a revised definition of "Waters of the United States" (USACE and EPA, 2023a). The revised rule became effective on March 20, 2023. On May 25, 2023, the U.S. Supreme Court issued a decision affecting the definition of Waters of the United States, or "WOTUS", in *Sackett Et Ux. V Environmental Protection Agency Et Al.* On August 29, 2023, the US EPA and USACE issued a final rule to amend the final "Revised Definition of 'Waters of the United States'" rule. The amendment conforms the definition of "Waters of the United States" to the U.S. Supreme Court's decision in the Sackett Et Ux. V Environmental Protection Agency Et Al case. The revised and amended definition of "Waters of the United States" is as follows:

(a) Waters of the United States means:

(1) Waters which are: (i) Currently used, or were used in the past, or may be susceptible to use in interstate or foreign commerce, including all waters which are subject to the ebb and flow of the tide; (ii) The territorial seas; or (iii) Interstate waters;

(2) Impoundments of waters otherwise defined as waters of the United States under this definition, other than impoundments of waters identified under paragraph (a)(5) of this section;

(3) Tributaries of waters identified in paragraph (a)(1) or (2) of this section that are relatively permanent, standing or continuously flowing bodies of water;

(4) Wetlands adjacent to the following waters: (i) Waters identified in paragraph (a)(1) of this section; or (ii) Relatively permanent, standing or continuously flowing bodies of water identified in paragraph (a)(2) or (a)(3) of this section and with a continuous surface connection to those waters;

(5) Intrastate lakes and ponds not identified in paragraphs (a)(1) through (4) of this section that are relatively permanent, standing or continuously flowing bodies of water with a continuous surface connection to the waters identified in paragraph (a)(1) or (a)(3) of this section;

(b) The following are not "waters of the United States" even where they otherwise meet the terms of paragraphs (a)(2) through (5) of this section:

(1) Waste treatment systems, including treatment ponds or lagoons, designed to meet the requirements of the Clean Water Act;

(2) Prior converted cropland designated by the Secretary of Agriculture. The exclusion would cease upon a change of use, which means that the area is no longer available for the production of agricultural commodities. Notwithstanding the determination of an area's status as prior converted cropland by any other Federal agency, for the purposes of the Clean Water Act, the final authority regarding Clean Water Act jurisdiction remains with EPA;

(3) Ditches (including roadside ditches) excavated wholly in and draining only dry land and that do not carry a relatively permanent flow of water;

(4) Artificially irrigated areas that would revert to dry land if the irrigation ceased;

(5) Artificial lakes or ponds created by excavating or diking dry land to collect and retain water and which are used exclusively for such purposes as stock watering, irrigation, settling basins, or rice growing;

(6) Artificial reflecting or swimming pools or other small ornamental bodies of water created by excavating or diking dry land to retain water for primarily aesthetic reasons;

(7) Waterfilled depressions created in dry land incidental to construction activity and pits excavated in dry land for the purpose of obtaining fill, sand, or gravel unless and until the construction or excavation operation is abandoned and the resulting body of water meets the definition of waters of the United States; and

(8) Swales and erosional features (e.g., gullies, small washes) characterized by low volume, infrequent, or short duration flow.

The 2023 revised and amended definition of Waters of the United States defines "adjacent" as "having a continuous surface connection". Wetland A is isolated in upland areas with no surface water connections to nearby tributaries to jurisdictional waters. As such, Wetland A is likely not regulated as Waters of the United States (WOTUS) by the USACE under Section 404 of the Clean Water Act. Wetland A likely meet the criteria of natural surface waters and is regulated as Waters of the State by WSDOE under the Revised Code of Washington (RCW) 90.48. If a future project cannot avoid direct impacts to the identified wetland, then permitting through the USACE and the WSDOE would likely be required.

Chapter 2. Closure

The findings and conclusions documented in this report have been prepared for specific application to the Moriarty Site. They have been developed in a manner consistent with that level of care and skill normally exercised by members of the environmental science profession currently practicing under similar conditions in the area. Our work was also performed in accordance with the terms and conditions set forth in our proposal. The conclusions and recommendations presented in this report are professional opinions based on an interpretation of information currently available to us and are made within the operation scope, budget, and schedule of this project. No warranty, expressed or implied, is made. In addition, changes in government codes, regulations, or laws may occur. Because of such changes, our observations and conclusions applicable to this project may need to be revised wholly or in part.

Chapter 3. References

Environmental Laboratory. 1987. *Corps of Engineers Wetlands Delineation Manual. Technical Report Y-87-1*, US Army Engineer Waterways Experiment Station, Vicksburg, Mississippi.

Granger, T., T. Hruby, A. McMillan, D. Peters, J. Rubey, D. Sheldon, S. Stanley, and E. Stockdale. 2005. *Wetlands in Washington State - Volume 2: Guidance for Protecting and Managing Wetlands.* Washington State Department of Ecology. Publication #05-06-008. Olympia, Washington. April 2005.

Hruby, T. 2014. *Washington State Wetland Rating System for Western Washington*: 2014 Update. (Publication #14-06-029). Olympia, WA: Washington Department of Ecology.

King County Code (KCC). 2022. *Chapter 21A24 – Critical Areas.* Website: https://aqua.kingcounty.gov/council/clerk/code/24-30_Title_21A.htm. October 31, 2022.

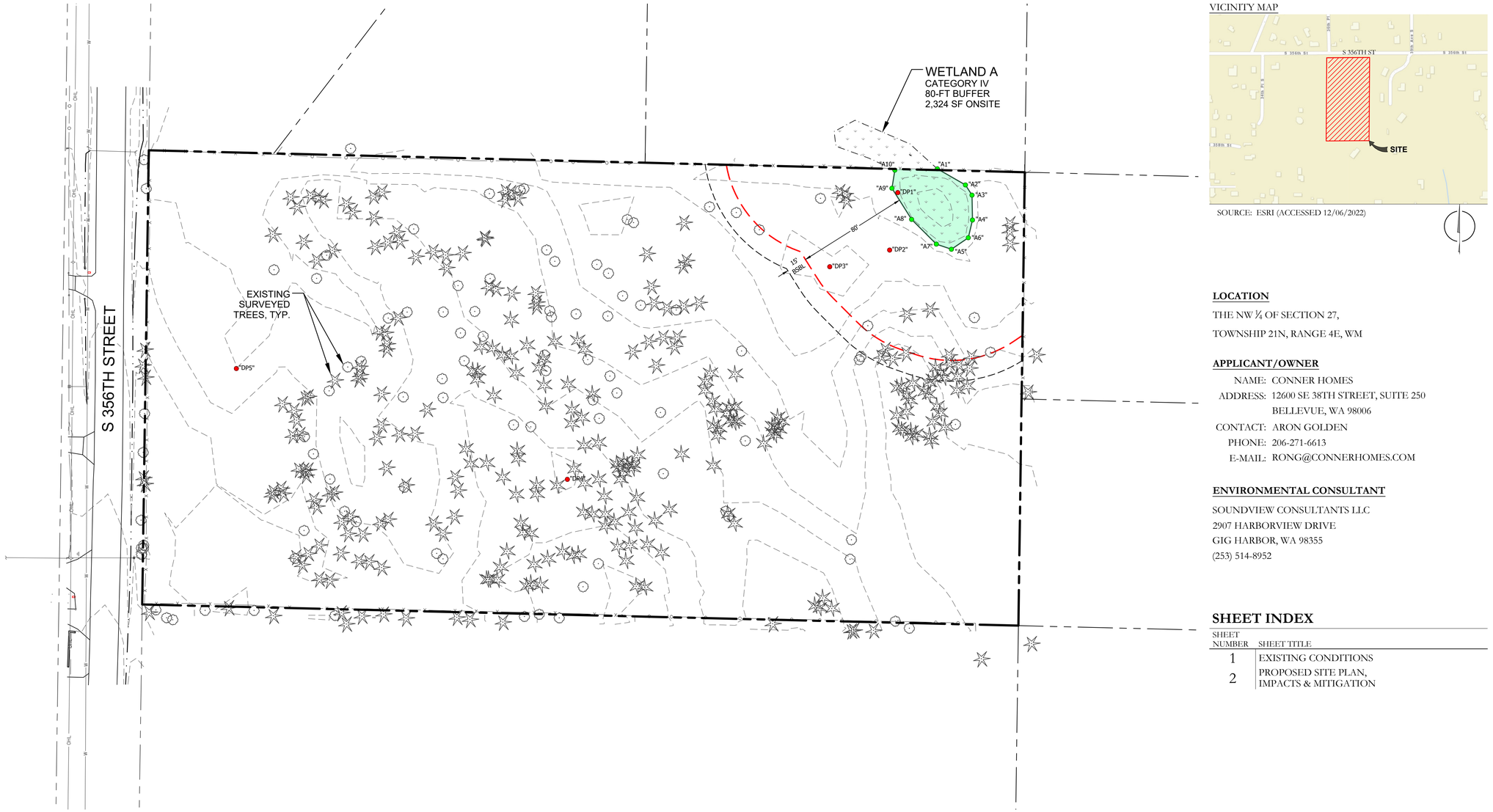
Soundview Consultants (SVC). 2022. *Wetland and Fish and Wildlife Habitat Assessment Report.* July 2022.

Sheldon, D., T. Hruby, P. Johnson, K. Harper, A. McMillan, T. Granger, S. Stanley, and E. Stockdale. 2005. *Wetlands in Washington State - Volume 1: A Synthesis of the Science.* Washington State Department of Ecology. Publication #05-06-006. March, 2005. Olympia, Washington.

U.S. Army Corps of Engineers (USACE). 2010. *Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Western Mountains, Valleys, and Coast Region (Ver2.0),* ed. J.S. Wakeley, R.W. Lichvar, and C.V. Noble. ERDC/EL TR-10-3. U.S. Army Engineer Research and Development Center. Vicksburg, Mississippi.

USACE and EPA. 2020. *The Navigable Waters Protection Rule: Definition of "Waters of the United States," 85 Fed. Reg. 77 (April 21, 2020) (codified at 33 CFR Pt. 328 and 40 C.F.R. Pt. 110, 112, 116, 117, 120, 230, 232, 300, 302, and 401).*

Appendix A – Existing Conditions and Proposed Exhibits



VICINITY MAP

SOURCE: ESRI (ACCESSED 12/06/2022)

LOCATION

THE NW ¼ OF SECTION 27,

TOWNSHIP 21N, RANGE 4E, WM

APPLICANT/OWNER

NAME: CONNER HOMES
ADDRESS: 12600 SE 38TH STREET, SUITE 250
BELLEVUE, WA 98006
CONTACT: ARON GOLDEN
PHONE: 206-271-6613
E-MAIL: RONG@CONNERHOMES.COM

ENVIRONMENTAL CONSULTANT

SOUNDVIEW CONSULTANTS LLC
2907 HARBORVIEW DRIVE
GIG HARBOR, WA 98355
(253) 514-8952

SHEET INDEX

0 40 80 160

GRAPHIC SCALE
1"= 40'

PLAN LEGEND

- PROPERTY LINE
- EXISTING WETLAND BOUNDARY
- APPROXIMATED WETLAND BOUNDARY (NOT SURVEYED)
- WETLAND BUFFER
- W-# WETLAND FLAG LOCATION
- DP-# DATA PLOT LOCATION
- EXISTING CONTOUR

SOURCE:

PACE
An Engineering Services Company
3501 Colby Way Suite 101
Everett, WA 98201
p. 425.486.6533 | f. 425.486.6593
Civil | Structural | Planning | Survey
www.paceengrs.com

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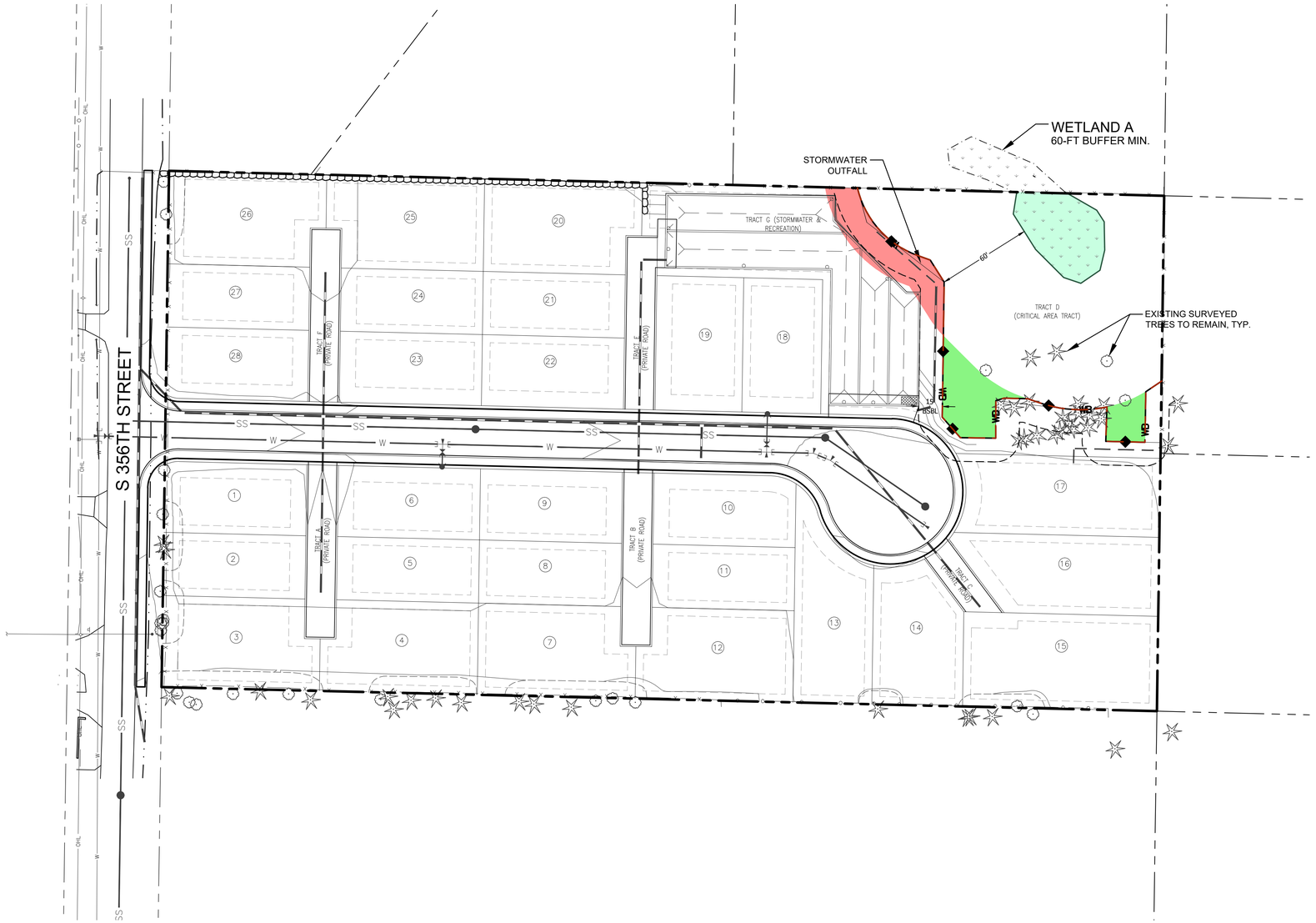
MORIARTY
LATITUDE: 47.281589
LONGITUDE: -122.287712

KING COUNTY
PARCEL NUMBER(S):
404570-0610

DATE: 04/11/2025
JOB: 1442.0005
BY: DLS/MW
SCALE: AS SHOWN
SHEET: 1

PROPOSED SITE PLAN, IMPACTS & MITIGATION



0 50 100 200

GRAPHIC SCALE
1"= 50'

PLAN LEGEND

- PROPERTY LINE
- EXISTING WETLAND BOUNDARY
- APPROXIMATED WETLAND BOUNDARY (NOT SURVEYED)
- POST-CONSTRUCTION BUFFER / CRITICAL AREA FENCE -- 405 LF
- CRITICAL AREA SIGNS -- 5 SIGNS
- EXISTING CONTOUR
- PROPOSED CONTOUR

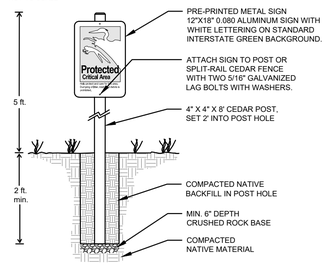
IMPACTS & MITIGATION LEGEND

BUFFER AVERAGING

DECREASED WETLAND BUFFER	2,104 SF
INCREASED WETLAND BUFFER	2,283 SF
WETLAND BUFFER NET GAIN:	179 SF

CRITICAL AREA SIGN DETAIL

NOT TO SCALE

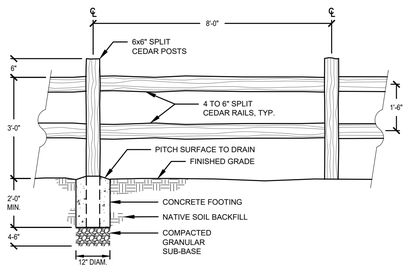


CRITICAL AREA BOUNDARY SIGN NOTES:

1. THE WETLAND/STREAM SIGN SHALL BE POSTED AT THE BOUNDARY BETWEEN THE LOT AND THE CRITICAL AREA.
2. ONE SIGN SHALL BE POSTED PER RESIDENTIAL LOT AND ONE SIGN PER 100 FEET FOR ALL PUBLIC RIGHTS-OF-WAY, TRAILS, PARKING AREAS, PLAYGROUNDS, AND ALL OTHER USES LOCATED ADJACENT TO WETLANDS AND ASSOCIATED BUFFERS.
3. PRE-PRINTED METAL SIGN AVAILABLE THROUGH:
   ZUMAR INDUSTRIES
   PHONE: 1-800-426-7967.
   WEBSITE: WWW.ZUMAR.COM

SPLIT RAIL FENCE DETAIL

NOT TO SCALE



NOTES:

1. POSTS AND RAILINGS PRE-CUT FOR ASSEMBLY.
2. 3-RAIL DESIGNS ARE PERMITTED.
3. FENCE SHALL BE PLACED AT APPROVED BUFFER EDGE.

SOURCE:

PACE
An Engineering Services Company
3501 Colby Way Suite 101
Everett, WA 98201
p. 425.486.6533 | f. 425.486.6593
Civil | Structural | Planning | Survey
www. paceengrs.com

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404570-0610

DATE: 04/11/2025
JOB: 1442.0005
BY: DLS/MW
SCALE: AS SHOWN
SHEET: 2

Y:\CURRENT\1442 Conner Homes\1442.0005 Moriarty\Graphics & Maps\CAD\A - CURRENT SVC DRAWINGS\A - Current Base Map\1442.0005 (2025-04) base.dwg
Plotted April 11, 2025

Appendix B – Qualifications

All determinations and supporting documentation, including this ***Buffer Averaging Plan*** prepared for the ***Moriarty*** project were prepared by, or under the direction of, Jon Pickett of SVC. In addition, report preparation was completed by Kramer Canup, and additional project oversight and final report review and quality control was completed by Elisabeth Gonzalez.

Jon Pickett is a Principal with 15 years of professional experience. Jon has a background in environmental and shoreline compliance and permitting, wetland and stream ecology, fish and wildlife biology, mitigation compliance and design, and environmental planning and land use due diligence. Jon oversees a wide range of large-scale industrial, commercial, and multi-family residential projects throughout Western Washington, providing environmental permitting and regulatory compliance assistance for land use entitlement projects from feasibility through mitigation compliance. Jon performs wetland, stream, and shoreline delineations and fish & wildlife habitat assessments; conducts code and regulation analysis and review; prepares reports and permit applications and documents; provides environmental compliance recommendation; and provides restoration and mitigation design.

Education: Bachelor of Science degree in Natural Resource Sciences from Washington State University and Bachelor of Science and Minor in Forestry from Washington State University. *Professional Trainings:* 40-hour wetland delineation training (Western Mountains, Valleys, & Coast and Arid West Regional Supplements); and trainings from Washington State Department of Ecology (WSDOE) Using the Revised Washington State Wetland Rating System (2014) in Western Washington How to Determine the Ordinary High-Water Mark (Freshwater and Marine), Using Field Indicators for Hydric Soils, and the Using the Credit-Debit Method for Estimating Mitigation Needs. *Qualified Author and Scientist Lists:* Whatcom County Qualified Wetland Specialist and Wildlife Biologist and is a Pierce County Qualified Wetland Specialist.

Elisabeth Gonzalez is an Environmental Project Manager and Scientist with 3 years of professional experience. Elizabeth has a background in project management, shoreline permitting, forest and marine ecology, and wetland delineations. Elisabeth brings experience in managing bulkhead repair and replacement projects, single-family residence planning and wetland delineations, and extensive permitting projects for marina renovations. Previously, she has managed multiple shoreline projects in assisting clients with permitting processes while implementing regulations within engineering designs. She completed her training in wetland delineations with the Wetland Training Institute in October of 2021 and has since been involved in wetland delineations all across western Washington. Elisabeth has also completed two internships with the US Forest Service and Maui Ocean Center, where she performed a variety of research-based field work and worked as a research assistant with Saving the Blue collecting data on shark species and environmental impacts on the ocean.

Education: Bachelor of Science in Environmental Science with a concentration in Forest and Marine Ecology and Oceanography from the University of Colorado, Boulder.

Kramer Canup is a Project Manager and Environmental Scientist with 10 years of professional experience. Kramer has a professional background in project management, ecological restoration, vegetation monitoring, invasive plant management, monitoring protocol development, grant writing, tropical ecology, wildlife monitoring and environmental education. He currently manages residential and commercial projects, performs wetland and ordinary high-water delineations and shoreline

assessments; conducts environmental code analysis and prepares environmental assessment and mitigation reports, biological evaluations, and permit applications to support clients through the planning and permitting processes. His noteworthy experiences include supporting clients with navigating environmental regulations related to land use and development, managing wetland and riparian restoration projects, leading wetland and ordinary high water delineations throughout the Puget Sound region, and instructing study abroad courses in the Peruvian Amazon for the University of Washington.

Education: Bachelor of Arts in Environmental Studies with a minor in Ecological Restoration from the University of Washington. *Professional Trainings:* Basic Wetland Delineator Training with the Wetland Training Institute 40-hour USACE wetland delineation training. Kramer has been formally trained through the Washington State Department of Ecology, Coastal Training Program, How to Determine the Ordinary High Water Mark, Using the Washington State Wetland Rating System (2014), and Using the Credit-Debit Method for Estimating Mitigation Needs.