



Washington State Department of Ecology
ATTN: Rebecca Rothwell
PO Box 47600
Olympia, WA 98504-7600

RE: Chapters 173-18, 173-20, 173-22, 173-26, and 173-27 WAC, Shoreline Management Act Rulemaking Informal Comment Period

Dear Ms. Rothwell:

The Port of Longview offers the following feedback on the draft SMP updates.

WAC 173-22

- "Marine" is defined as tidally influenced waters. This should add "with salinity at or around 0.5 ppt."
- [Pg 3/4] It would be helpful to refer to the proposed WAC changes here, so there is a defined technical method for defining critical areas, buffers, or sea level rise hazard areas referred to specifically at this point. WAC 173-26-246 (6)(d).

WAC 173-26

- Shoreline/critical areas overlap.
 - o This seems to indicate that shorelines reviews and regulations will require CAO compliance for approval. This could have an effect because the action for Shorelines may not trigger a permit requirement under CAO; they are not synonymous.
- Emphasis on nature-based solutions for all shoreline modifications is problematic.
 - o Some projects require hardened shoreline modifications to protect critical public infrastructure
 - o A sea wall revetment needs to have specific technical performance, requiring a nature-based solution may endanger critical infrastructure.
 - o Example, page [156] (v) goes into this in more detail, noting that nature-based solutions may use hard materials, though only when aligned with the natural shoreline processes of the site. Hard materials refers to rocks, large wood, gravel/cobble, and other solid natural materials. Generally, the harder the construction measure, the greater the impact on shoreline processes, including sediment transport, geomorphology, and biological functions. There is a range of nature-based solution alternatives varying from soft to hard that include: (list of things from vegetation to logs)
 - o Would prefer a method to determine when that is appropriate; i.e. industrial areas or 0' setback, may consider nature-based solutions which have been utilized in a similar environment to the degree of certainty required for infrastructure purposes. Recommend using a strategy such as evaluation of project need, location, and risk factors. Applicant must select the least impactful strategy that meets the project need.
- [Pg 159] does go into when new, enlarged, and expanded shoreline structures may be acceptable, but it is an "and" list, so all criteria must apply. A geotechnical analysis is required. Work will only be authorized if damage will occur within 3 years. An alternatives analysis must consider all options, including vegetation, improving upland drainage, beach nourishment, building relocation, nature-based solution, and then hard options can be considered.

