

**AUDUBON WASHINGTON • EVERGREEN ISLANDS • FRIENDS OF GRAYS HARBOR • FRIENDS OF
THE SAN JUANS • FUTUREWISE • LEAGUE OF WOMEN VOTERS OF WASHINGTON • SKAGIT
LAND TRUST • WASHINGTON CHAPTER OF THE SIERRA CLUB • WASHINGTON CONSERVATION
ACTION • WHIDBEY ENVIRONMENTAL ACTION NETWORK**

August 15th, 2025

State of Washington Department of Ecology
Shorelands and Environmental Assistance Program
300 Desmond Drive
Lacey, Washington 98503

Dear State of Washington Department of Ecology staff:

Subject: Comments on the Shoreline Management Act Preliminary Draft Language

Sent via email to: SMARulemaking@ecy.wa.gov

We appreciated the opportunity to meet with you on July 8 to discuss the preliminary draft update to the Washington Administrative Code (WAC) language. Representatives from many of our organizations also participated in the July 22 public listening session, the July 24 Environmental Justice listening session, and several Local Government Sounding Board meetings in 2025.

Our intent is to provide constructive input that supports Ecology's rulemaking objectives while ensuring the final language is clear and effective. This letter offers formal recommendations on the preliminary draft. We identify provisions that are well-crafted and should be retained in the final CR-201 language, as well as provisions that would benefit from stronger wording or greater specificity. For the latter, we provide proposed amendments and additions to the WAC, accompanied by the rationale supporting each recommendation.

Audubon Washington is a field office of the National Audubon Society. Our mission is to protect birds and the places they need by using science, advocacy, education, and on-the-ground conservation. Nature centers, chapters, and partners give Audubon Washington an unparalleled wingspan that reaches over 50,000 people each year to inform, inspire, and unite diverse communities in conservation action.

Evergreen Islands works to promote, protect, and defend the unique ecosystems involving the saltwater islands of Skagit County and their environs as it relates to the built and natural environments.

FOGH (Friends of Grays Harbor) is a broad-based 100% volunteer tax-exempt 501(c)(3) citizens group made up of crabbers, fishers, oyster growers and caring citizens. The mission of FOGH is to foster and promote the economic, biological, and social uniqueness of Washington's estuaries and ocean coastal environments. The goal of FOGH is to protect the natural environment, human health and safety in Grays Harbor and vicinity through science, advocacy, law, activism and empowerment.

Friends of the San Juans (Friends) is a community-based, non-governmental organization that has worked for nearly 50 years to bring people and nature together to protect the San Juan Islands and the Salish Sea through law, policy, science, and education. Friends envisions a future where the San Juan Islands and the Salish Sea thrive as a sanctuary of biodiversity and sustainability, fostered by a community deeply connected to and actively protecting this special place.

Futurewise works throughout Washington State to support land-use policies that encourage healthy, equitable, and opportunity-rich communities, that protect our most valuable farmlands, forests, and water resources, and encourage growth in our cities and towns to prevent poorly planned sprawl. Futurewise has members across Washington State.

League Of Women Voters of Washington is a nonpartisan political organization. We encourage the informed and active participation of citizens in government. The League acts in support of, or in opposition to, selected governmental issues that its members have studied. It does not support or oppose candidates, factions, or political parties. The League of Women Voters of Washington supports actions to protect the ecological functions of our shorelines and protect against sea-level rise, considering environmental protection to be overarching and not considered co-equal to the goals of development and impacts of public access.

Sierra Club is the largest and most influential grassroots environmental organization in the country. For more than 130 years, we've been working to promote clean energy, safeguard the health of our communities, protect wildlife, and preserve our remaining wild places through grassroots activism, public education, lobbying, and legal action.

The Skagit Land Trust conserves wildlife habitat, agricultural and forest lands, wetlands, and shorelines for the benefit of our community and future generations. Our organization has over 1,700 members and volunteers who work to protect the most important places in Skagit County. Today, the Trust protects more than 10,000 acres, including more than 48 miles of shoreline.

Washington Conservation Action is a statewide nonprofit conservation organization. A top priority for us and our members is the protection and restoration of the Salish Sea, Puget Sound and the region's rivers, streams and lakes. Development of smart land use regulations, and

implementation of them, is one essential tool to ensure a healthy environment, clean water, and thriving communities.

Whidbey Environmental Action Network (WEAN) protects wild spaces and promotes healthy ecosystems in and beyond Island County, Washington. For nearly four decades, WEAN has engaged in environmental and civic education, policy advocacy, and strategic litigation in defense of nature and communities.

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*Note: **suggested language changes are in bold italics.***

Sea Level Rise and Increased Storm Severity

We strongly support many elements of Ecology’s rulemaking, including the concepts of the Sea Level Rise Hazard Area and the Future Tidal Inundation Area; their inclusion within shoreline jurisdiction; limits on development in these areas; the requirement to include a vulnerability assessment in SMPs; and the definition of “should.” These provisions help align SMA rules with HB 1181’s requirement to prepare for climate impacts. We recommend several edits to further strengthen that alignment:

- Growth Management Act (GMA) and Shoreline Management Act (SMA) rule coordination. Ecology has created rules that will help protect our shorelines and prepare them for climate change. Draft GMA rules do not provide the same level of protection and resiliency for areas just outside shoreline jurisdiction. For example, the GMA does not require that local jurisdictions include plans for Sea Level Hazard or Future Tidal and Groundwater Inundation areas. We are concurrently urging Commerce to include Ecology rules for mapping and creating regulations for a Sea Level Rise Hazard Area and a Future Tidal Inundation Area, for vulnerability assessment requirements, and for requiring that a climate vulnerability assessment be part of comprehensive plans. We propose that Ecology urge Commerce to adopt SMA rules. (WAC 365-196-580 of the GMA requires coordination) *Rationale: WAC 365-196-580 of the GMA requires coordination.*
- Definitions. WAC 173-26-020 (p16) “Future Tidal Inundation Area”. We strongly support the addition of the Future Tidal Inundation area. To further specify this definition, consider changing the title to “Future Tidal **and Groundwater** Inundation Area.”

Rationale: groundwater rise will be a significant contributor to frequent inundation.

- Definitions. WAC 173-26-020 (p16) "**Future Tidal and Groundwater Inundation**" area means the area expected to be flooded by ~~daily yearly~~ high tides by ~~about the year 2100 or~~ 70 years...."

Rationale: yearly flooding will result in significant damage to buildings and shorelines.

- Definitions. WAC 173-26-020 (p16) "**Future Tidal and Groundwater Inundation**". We strongly support the addition of the Sea Level Rise Hazard Area designation. To further strengthen this definition, consider adding the following to the definition: "Ecology will publish and update every 5 years a guidance document that master programs **should** follow that adds detail and supports the mapping of the Future Tidal and Groundwater Inundation Area."

Rationale: Local jurisdictions will need help with this.

- Definitions. WAC 173-26-020 "**Affected Tribes**". Consider defining what is meant by "affected Tribes" as used in WAC 173-26-221(1). Impacts from permitted projects and programs can affect natural and cultural resources, including habitats that support forage fish and juvenile salmon habitats. Salmon are among Washington State's many Treaty-protected resources, and as an example actions that impact salmon population viability inherently affect Tribes. We urge Ecology to collaborate with Tribes and Tribal organizations to determine what "affected Tribes" means and includes. A defined term inclusive of natural and cultural resources to lend consistency across jurisdictions would be helpful.

- **Additional areas as shorelands**, WAC 173-22-030 (p3) and WAC 173-26-246 (p187). Including the Sea Level Rise Hazard Area, 100 year floodplains, and critical areas buffers within shoreline jurisdiction is more likely with the following wording: "local governments ~~may~~**should** include..." (iii) Depending on the elevation of the shoreline and other characteristics, the Sea Level Rise Hazard Area ~~may~~**should** extend beyond the current shoreline jurisdiction.

- Protection of critical areas, **Sea Level Rise Hazard Areas, estuaries**, and shoreline ecological functions. WAC 173-26-226 (p 115, p116 and p125). Please **add both these areas to the section title and to the text**.

Rationale: These areas both need the protection of special standards. Estuaries are mentioned only on page 133 of WAC 173-26. This habitat is mostly gone from Puget Sound, is critical to ecological function and salmon recovery, and is under threat from sea level rise.

- **Conservation acquisition framework. New section.** Please add a requirement that master program planning include describing a process for local jurisdictions acquiring land with potential valuable environment function that is under threat from climate change.
- **Emergency structures. New Section.** Please add a requirement that master program planning include identifying structures that can serve to mitigate coastal flooding impacts.
- **Implementation.** WAC 173-26-191 Master program contents (p72). (c) Incorporating master program provisions into other plans and regulations. Please add the requirement that an implementation plan be included in master programs. The plan should include regulations, zoning and shoreline designations, enforcement procedures, and codes that require change to comply with the master program.

Rationale: implementation is discussed in many chapters but there is no requirement that there be a targeted implementation plan

- **Bluff erosion. WAC 173-26-226(1)(e)(ii).** We recommend adding the following new subsection: (B) **In designating sea bluff erosion hazards, include estimates of increased bluff erosion due to sea level rise.**

In the absence of a geotechnical analysis that determines the erosion risk over a 70-year period, the area should include a 200' buffer from the top edge of erodible bluffs in addition to landslide runout buffers and side buffers.

Rationale: Sea level rise has and will increase bluff retreat. Rising sea levels and increasing wave heights will exacerbate coastal erosion and shoreline retreat in all geomorphic environments along the west coast. Projections of future cliff and bluff retreat are limited by sparse data in Oregon and Washington and by a high degree of geomorphic variability along the coast. Projections using only historic rates of cliff erosion predict 10–30 meters [33 to 98 feet] or more of retreat along the west coast by 2100. An increase in the rate of sea-level rise combined with larger waves could significantly increase these rates. Future retreat of beaches will depend on the rate of sea-level rise and, to a lesser extent, the amount of sediment input and loss.

Sea Level Rise Hazard Area

- Definitions. WAC 173-26-020 (p21) "**Sea Level Rise Hazard Area**". We strongly support the addition of the Sea Level Rise Hazard Area designation. To further specify this definition: "Sea Level Rise Hazard Area means a mapped regulatory overlay zone that a local government designates to manage development in areas likely to be impacted by sea level rise. The area is determined based on a planning exercise that shall include reviewing information from a sea level rise vulnerability assessment. The Sea Level Rise Hazard Area must encompass the land, at a minimum, that best available predictive modeling indicates will be ~~is reasonably likely to be~~ exposed to the sum or the ~~a combination of~~ hazards described in WAC 173-26-246(6) ~~such as high tides, freshwater flooding, erosion, waves, and groundwater rise over a long-term planning horizon~~ 70 years from the deadline for the completion of the next periodic review and include the area of future tidal inundation".

Rationale: These elements are hazards when they happen together – a high tide, a wind storm, a rain storm, and sea level rise.

- WAC 173-26-246 Sea level rise planning. *P181* We support the thorough listing of hazards in this section and suggest two edits: "(b) Sea level rise will cause or exacerbate hazards, including **permanent** inundation of land, coastal and compound flooding, beach and bluff erosion, groundwater rise, and salinization. The impacts of coastal storms will be more severe with higher sea levels. Planning for sea level rise requires considering all impacts that are caused by or associated with sea level rise **for which information is available**. Throughout this rule, references to sea level rise planning are intended to include planning for associated hazards."

Rationale: Hazards need to be considered even if data is not available. Lack of information does not mean they don't exist.

- WAC 173-26-246 Sea Level Rise Planning

(6) Process to amend master programs to address sea level rise.

(b) Step 2: Review **and incorporate** information about sea level rise vulnerability.

Rationale: The original title is incomplete, the step requires more than just a review.

We suggest the following edits to the requirements for how the vulnerability assessment addresses sea level rise:

P183 “ (iii) The sea level rise vulnerability assessment that is used by a local government to inform master program provisions must meet the following technical requirements.

(A) Use current and accurate sea level rise projections, hazard modeling and mapping, and other scientific and technical information, as described in WAC 173-26-246(10).

(B) Evaluate a minimum of two sea level rise scenarios, including a shorter-term and a long-term scenario. Long-term means ~~about~~ 70 years from the deadline for completion of the next periodic review, ~~or 2100, whichever is later~~. Shorter term means 20-40 years. Sea level rise amounts evaluated for each time horizon should, for scenario-based projections, align with at least the intermediate scenario or a higher amount of sea level rise. For probabilistic projections, the amount of sea level rise should align with the high emissions scenario and a 50% likelihood or a lower likelihood projection. Assessments should use relative sea level rise amounts that incorporate local vertical land movement. Assessments may use scenarios similar to those described here; they do not need to be identical.

(C) Identify and provide maps of the area of future tidal inundation; this is the area expected to be flooded by ~~daily~~ **yearly** high tides under the long-term sea level rise scenario described in (B).

(D) Identify and provide maps of the of the ~~area that is projected to be exposed to coastal flooding~~ **Sea Level Rise Hazard** area that is projected to be exposed to **groundwater rise**, bluff erosion, **high tides**, **and** coastal flooding during a 20-year **rain** storm **and a 20-year wave** event, under the selected long-term sea level rise scenario, or a another locally relevant water level that corresponds to a lower likelihood event. This area will extend landward of the area of future tidal inundation **and will move inland as seas rise**. If available, use flood mapping generated from dynamic modeling of future coastal storm conditions with sea level rise. ~~Use total water level inclusive of wave runup if available from dynamic modeling or other appropriate sources. The Sea Level Rise Hazard Area water elevation used for mapping should be the sum of the current 50% tidal elevation plus the long-term static sea level rise described in (B) plus flooding from rivers, streams, and stormwater plus waves. Ecology will publish and update a sea level rise guidance document that should be followed. If groundwater elevations 70 years from the deadline for completion of the next periodic review are predicted to be higher than this elevation, the groundwater elevation plus surface stormwater flow will define the extent of the Sea Level Rise Hazard Area. Use extreme still water levels if total water levels are not available and wave runup is not a major factor for the shoreline.”~~

Rationale: Local governments need clear direction and support in determining the Sea Level Rise Hazard Areas.

In areas that have sea walls or are diked, the hazard will come from rising groundwater and stormwater that has no place to go.

“ (E) Analyze or describe all additional relevant coastal hazards exacerbated by sea level rise ~~for which information is available~~ at the time of the study, including erosion, ~~compound flooding, stormwater flow~~ , and groundwater ~~rise and~~ salinization. These hazards should be mapped if sufficient information is available. If data are not available to model future hazards, assessments should describe anticipated changes in hazard frequency, severity, and impacts.”

(F) ~~“If information is available,~~ analysis should also consider how shoreline infrastructure

may mitigate or further exacerbate impacts, such as stormwater backflow, levee and seawall protection or failure, and other interactions.”

- WAC 173-26-246 Sea level rise planning. (10) Principles for using sea level rise information in shoreline planning. We strongly support here and in WAC 173-26-201, the requirement that current, accurate, and complete scientific information be used in drafting vulnerability assessments and in all other areas of comprehensive plans.
 - The Sea Level Rise Hazard Area as shoreland, WAC 173-22-030 (p3) and WAC 173-26-246 (p187). Including the Sea Level Rise Hazard Area within shoreline jurisdiction is more likely with the following wording: “local governments **may should** include... (iii) Depending on the elevation of the shoreline and other characteristics, the Sea Level Rise Hazard Area **may should** extend beyond the current shoreline jurisdiction”.
 - We support the permit requirements for the sea level rise hazard area in WAC 173-27-185 especially the requirement in WAC 173-27-185(3)(c) to identify how much sea level rise is projected for the location of the project over its functional lifespan. We also support that WAC 173-27-185(3)(f) requires a demonstration that the most precautionary adaptation alternative that is feasible and applicable has been selected.
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Achievement of No Net Loss of ecological function

What we liked:

- Added section (173-26-221(2)) on assessing and addressing nonconforming uses and lots to achieve no net loss of ecological function.
- Added detail and clarity in 173-26-226 protection of critical areas and shoreline ecological function.
 - The addition of subsections for floodways and frequently flooded areas, channel migration zones, and critical aquifer recharge areas.
 - Subsection (2) outlining requirement to achieve no net loss and the restore lost ecological function.
 - 173-26-266(2)(e)(ii)(D) and (F) which cite the use of Riparian Ecosystem, Volume 2: Management Recommendations and identify vegetated areas along streams that once supported or could in the future support mature trees as areas to protect and restore up to those standards.
- Overall improved use of “shall” in place of “should” and achieving no net loss throughout the new language.
- The improved channel migration provisions in WAC 173-26-226(1)(h).

What we want to see:

- Include climate change impacts in the following places:

- Wetland buffers, WAC 173-26-226(1)(d)(v) (p121) – We appreciate the additional clarity on how local jurisdictions must ensure no net loss of wetland buffers. We believe, however, that there should be language that describes impacts to wetland buffers by sea level rise and climate change as well as provisions to ensure no net loss of wetland buffer function in the face of these impacts.
- Fish and Wildlife habitat areas, WAC 172-26-226(1)(f)(i)(C) (p123) – Fish and wildlife habitat area protections – We appreciate the additional clarity on how local jurisdictions must ensure no net loss of fish and wildlife habitat areas. Language should be added, however, to address the impacts of climate change and sea level rise to fish and wildlife areas.
- Frequently flooded areas, WAC 172-26-226 (1)(g)(i)(A) (p126) – We support the added language on how local governments must include *“increased storm intensity and overland runoff, compound coastal flooding from sea level rise, elevated high tides, storm and wind waves, and elevated groundwater levels as identified through locally completed vulnerability assessments and statewide data provided by federal and state resource agencies, including ecology”* into how they regulate frequently flooded areas.
- Channel migrations zones, WAC 172-26-226(1)(h)(ii)(A) (p130) – We appreciate the additional language on how local jurisdictions must regulate the CMZ to ensure no net loss of ecological function. We believe, however, that there must be language to address how CMZs will be affected by sea level rise, increased storm severity and overland runoff, and other climate change impacts identified through locally completed vulnerability assessments and statewide data provided by federal and state resource agencies.
- Shoreline stabilization, WAC 173-26-231 (p157)(3)(c)(x)(C) stating *“any existing walls or bulkheads being replaced shall not encroach waterward of the ordinary high-water mark or waterward of the existing stabilization structure”* must also use best available predictive modeling to ensure the structure will not be waterward of the ordinary high-water mark through the structure’s expected lifetime.

Rationale: all rules need to consider climate change.

- WAC 173-26-226(2)(a)(ii) states *“Natural and climate change-driven modifications are outside the scope and purview of the master program and cannot be subject to the shoreline ecological protection requirement or the master program no net loss of shoreline ecological function principle. These factors should be considered as part of the master program planning related to sea level rise, frequently flooded areas, geologically hazardous areas, and channel migration zones.”* We believe all rules must consider the impacts of climate change including the shoreline ecological protection requirement to be in accordance with HB 1181, therefore, we urge Ecology to remove this language. We believe natural and climate change-driven modifications should be addressed throughout WAC 173-26-226(2). Specifically, we would like to see future impacts of sea level rise addressed in 173-26-226(2)(b) – Principles, 173-26-226(2)(c) – general standards, 173-26-226(2)(d) – Shoreline buffers, 173-26-226(2)(e) – Shoreline vegetation conservation, 173-26-226(2)(f)(iii) Water quality, stormwater, and nonpoint pollution prevention standards, and throughout 173-26-231 – Shoreline modifications.

Rationale: all rules need to consider climate change.

- Vegetation Conservation, WAC 173-26-226(2)(e)(iii)(B) *“Establish vegetation conservation standards that implement the principles in WAC 173-26-226(2)(d)(i) and (ii). Methods to do this should include clearing and grading standards, tree retention provisions, vegetation replacement ratios, **and** impervious surface limitations based upon environment designation., ~~and regulatory incentives.~~”*

Rationale: regulatory incentives is an undefined term and does not provide local jurisdictions with any further clarity for methods to implement vegetation conservation standards.

- Single-family residential development, WAC 173-26-191 (p91)(C). Development should not be allowed as a conditional use in the “natural” environmental designation.

Rationale: RCW 90.58.020 gives “priority” to single-family residences but does not specify that this extends to all designations.

- Minimum of no net loss. WAC 173-26. Replace “no net loss” with “at a minimum to achieve no net loss” throughout.

Rationale: Ecology should push local jurisdiction to go above and beyond no net loss regulation given the continuous degradation of shoreline ecological functions due to development.

- Encourage local jurisdictions to adopt standard mitigation practices within SMPs that ensure “net ecological gain” as defined by the Net Ecological Gain Interim Proviso Report from WA DFW, directed by the WA legislature: *“Net Ecological Gain: “Ecological functions and values, that support biodiversity and resiliency of native plant, animal and fungi species, water quality and quantity, air quality, and food security for all species, are improved over current conditions, at a cumulative scale that can be incrementally implemented through site-specific actions, with any short-term loss of those functions and values being more than offset by overall ecological gains.”*
- The Net Gain proviso report identifies SMA as a critical piece to protecting current existing and functional shoreline habitat. It additionally recommends leaning on existing authorities and plans (including SMA, GMA, and salmon recovery plans) to create a cohesive administration and enforcement of a net ecological gain program.
- While we appreciate the improvements to the critical areas regulations in new WAC 173-26-226, increased protections for critical areas are needed the SMP Guidelines by:
 - Clarifying avoidance. The SMP Guidelines should be clear that impacts are not allowed for key critical areas such as Category I wetlands, Category II wetlands can only be impacted for limited uses as provided in Ecology’s guidance for local wetlands regulation; and riparian buffers except for water dependent uses and existing uses.
 - While we appreciate the reference to the Department of Fish and Wildlife recommendations, the SMP Guidelines must require riparian buffers that have the width of one 200-year site-potential tree height (SPTH) measured from the edge of the active channel or active floodplain. These buffers are needed to stop the declines in salmon stocks and to protect the southern resident orcas. These buffers are supported by the new best available science.
 - Strengthen mitigation monitoring requirements and requirements to fix mitigation that do not comply with the mitigation plan. Annual monitoring reports should be required by the local government and provided to Ecology.
 - Mitigation for priority habitats and species should be based on the Washington State Department of Fish and Wildlife recommendations.

- The SMP Guidelines should be clear that WDFW priority habitats and species and high quality ecosystem and rare plant categories and listings from the Department of Natural Resources Natural Heritage Program must be designated and protected as critical areas.
- We support the improved shoreline stabilization SMP Guidelines in WAC 173-26-231(3).

More Comprehensive Enforcement and Compliance

What we liked:

- Appreciate greater clarity in process and definitions, specifically the description of what “shoreline stabilization” is in WAC 173-27-040 and what “emergency construction” isn't, the definition of “emergency,” and a specific list of what qualifies as temporary measures for an emergency exemption.
- Reporting shoreline exemptions to Ecology.
- Changing mentions of adverse environmental impact to “no net loss.”

What we want to see:

- Implementation progress report. [RCW 36.70A.130](#) and WAC 365-196 (p63) specify a requirement for a report, review procedures, and local work plans if not implemented for Comp plans. Please add this requirement for SMPs.
- Document unpermitted changes, WAC 173-26-191 (p71). Local jurisdictions should document and report to Ecology all unpermitted changes every 5 years.
- Order for removal and remediation for unpermitted shoreline development, WAC 173-27-270 (p58)(2) and (3). **Add an order for removal and redemption.**

Rationale: removal and remediation are mentioned in the permit rescission section; however, corrective action is contingent upon the action having been initially permitted and does not address corrective action for unpermitted shoreline structures, such as unpermitted hard armoring.

- Penalties, WAC 173-27-280 Civil penalty, (p59)(4). The penalty shall not exceed **one** two thousand dollars for each violation....

Use stronger language in the civil penalties section, where it says “**may**” please consider “**shall**,” or at very least “**should**”.

Rationale: “may” is not strong enough language to actually create accountability for violations, there is currently no incentive to be in compliance or seek a permit.

This rulemaking is a significant opportunity to protect public health, public and private investment, Treaty Rights, and the ecosystem. We appreciate Ecology's work in researching these important topics, your transparency in this process, and the time you took to meet with our group and others to discuss the preliminary draft.

Thank you for considering our comments. In the meantime, please reach out to one of us if you'd like to discuss our comments between now and the final proposed language in early 2026.

Very Truly Yours,

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