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futurewise.org

August 12, 2025

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

Dear Department of Ecology Staff:

Subject: Chapters 173-18, 173-20, 173-22, 173-26, and 173-27 WAC, Shoreline Management Act Rulemaking Informal Comment Period. These comments focus on the use of Federal Flood Insurance data to protect people and property from sea level rise.

Thank you for the opportunity to comment on the draft rules during the information comment period. Futurewise works throughout Washington State to support land-use policies that encourage healthy, equitable and opportunity-rich communities, and that protect our most valuable farmlands, forests, and water resources. We have members across Washington State.

We understand that some commentators are arguing that planning and regulating to protect people and property from sea level rise should be based on Federal Emergency Management Flood Insurance Studies and rate maps. These documents are based on past flood events and do not incorporate sea level rise projections. Flood Insurance Studies, Flood Insurance Rate Maps (FIRMs), and flood plain regulations are not enough to address sea level rise for three reasons. The *Projected Sea Level Rise for Washington State – A 2018 Assessment* explains two of them:

Finally, it is worth emphasizing that sea level rise projections are different from Federal Emergency Management Agency (FEMA) flood insurance studies, because (1) FEMA studies only consider past events, and (2) flood insurance studies only consider the 100-year event, whereas sea level rise affects coastal water elevations at all times.¹

¹ Miller, I.M., Morgan, H., Mauger, G., Newton, T., Weldon, R., Schmidt, D., Welch, M., Grossman, E., *Projected Sea Level Rise for Washington State – A 2018 Assessment* p. 8 of 24 (A collaboration of Washington Sea Grant, University of Washington Climate Impacts Group, Oregon State University, University of Washington, and US Geological Survey.

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The third reason is that some of the Flood Insurance Rate Studies and Flood Insurance Rate Maps (FIRMs) are quite old. Some Skagit County FIRMs along Puget Sound, for example, became effective on January 3, 1885.² This does not provide the current data or future projections needed to address sea level rise.

For these reasons, we support the approach in the informal rules for designating the areas to be affected by sea level rise. We do have some suggestions to strengthen this approach which we will be submitting along with other environmental groups and individuals later in the public comment period.

Thank you for considering our comments. If you require additional information, please contact me at telephone 206-343-0681 or email tim@futurewise.org.

Very Truly Yours,



Tim Trohimovich, WSBA No. 22367
Director of Planning & Law

Enclosures

Prepared for the Washington Coastal Resilience Project: updated 07/2019) last accessed on July 28, 2025, at: https://cig.uw.edu/wp-content/uploads/sites/2/2019/07/SLR-Report-Miller-et-al-2018-updated-07_2019.pdf and enclosed using the comment website with the filename: "SLR-Report-Miller-et-al-2018-updated-07_2019.pdf."

² Flood Insurance Rate Map, Skagit County, Washington (Unincorporated Areas) Community Panel Number 530151 0250 C enclosed using the comment website with the filename: "5301510250C.pdf."