Robert Phillips

Comments are provided in the attached file.

Comments on WAC 173-26 & 173-27 Shoreline Management Act Rule Making

Introduction

Dear Shorelands and Environmental Assistance Program Team,

Thank you for the opportunity to provide comments on the proposed updates to the Shoreline Master Program (SMP) rules. I commend the Department of Ecology for its leadership in advancing Washington's coastal resilience in response to sea level rise (SLR), increased storm severity, and evolving climate risks. These updates represent a meaningful step toward modernizing shoreline planning and hazard mitigation.

At the same time, I respectfully offer the following comments with the goal of enhancing the clarity, functionality, and long-term effectiveness of the rule framework. My intent is to support the development of a planning structure that not only fulfills the statutory objectives of the Shoreline Management Act (SMA), but also reflects best practices in adaptive, science-based coastal management.

A more robust and flexible framework—grounded in current and projected hazard conditions—will better equip local governments to implement resilient, equitable, and forward-looking shoreline policies. To achieve this, it is essential that the regulations prioritize community resilience over enforcement alone. The rules should be supported by comprehensive planning guidance and technical standards that enable innovation, consistency, and practical implementation across jurisdictions. Specifically, I recommend that Ecology consider the following:

- Expand the definition of qualified professionals to include coastal engineers, geologists, and hydraulic engineers.
- Develop and publish a statewide technical guidance manual to accompany the rule updates.
- Adopt a two-zone regulatory framework for flood hazard zones; (1) current flood zone and (2) Future adaptation zone using the proper type of tools and techniques for compatibility between the two.
- Encourage scenario-based planning and hydrodynamic modeling for SLR hazard assessments.
- Clarify the regulatory treatment of nature-based solutions and multi-hazard adaptation strategies.
- Ensure alignment with FEMA/NFIP requirements and local comprehensive plans.
- Encourage adaptive management strategies with clear triggers for retreat, elevation or redesign with periodic reassignment as part of the SLR hazard zone planning.
- Provide mechanisms for administrative updates and phased adaptation pathways.
- Align SMP updates with other cross jurisdictional and interjurisdictional planning efforts for hazard mitigation plans, comprehensive plans to avoid regulatory conflicts.
- Clarify and supplement terminology that is important and relevant to SLR and climate change resiliency planning.
- Support local jurisdictions with funding, technical assistance, and implementation timelines.
- Define storm severity and compound flooding and how it will be used in the SLR hazard planning.
- Provide a mechanism for balancing science to actionable risk mitigation and adaptation strategies that reflect local realities.

These recommendations are intended to strengthen the proposed rules and ensure they are both technically sound and operationally feasible. Table 1 outlines additional more detailed comments on the topics outlined above.

Table 1 – Rule Making Comments by Topic

Topic	Summary of Comments
Professional Qualifications	The current draft of WAC 173-26 requires the use of a geotechnical engineer and geotechnical report for evaluating shoreline hazards such as erosion and hydrology. While geotechnical engineers are essential for analyzing subsurface and slope stability, they are not typically trained to assess dynamic coastal processes that will now be critical to the SLR hazard zone determinations. To improve the accuracy and effectiveness of shoreline hazard assessments, it is recommended that a broadening of the required technical expertise includes coastal engineers, coastal geologists, and hydraulic engineers. Coastal engineers should be explicitly included in the list of qualified professionals for shoreline stabilization and Sea Level Rise assessments. Current language appears to exclude that key expertise which are critical to the success of waterfront zone planning. Include coastal geologists for sediment transport, shoreline change, and geomorphic analysis. Include hydraulic engineers for flood modeling, estuarine hydrodynamics, and surface water interactions. Retain geotechnical engineers for slope stability and foundation assessments. Consider requiring an interdisciplinary review for high-risk or complex shoreline developments (definition would be needed).
State Level Technical Guidance Manual	Ecology should publish or endorse a comprehensive technical manual outlining best available science, methods, and goals for use by SMP updates and other state mandated regulatory (comprehensive plans) and hazard mitigation planning programs. This document should be developed in coordination with the rule making. Currently several different references apply that could lead to confusion and inconsistent planning between jurisdictions. A statewide SLR non regulatory, technical guidance document led by Ecology would bridge the gap between regulatory requirements and practical implementation, would provide a unified technical guidance document, could have flowcharts, checklists, and provide commentary to aid in the implementation of new rules at local level. It would also empower local governments to plan proactively, reduce permitting conflicts, and ensure consistent application of the new SMP rules in a way that is science-based, equitable, and locally relevant. State of California (CA) Coastal Commission developed Interpretative Guidelines for Addressing SLR in Local Coastal Programs (LCP) and Coastal Development Permits. The LCP program is a good analog for the SMP updates outlined in the rule making. California Coastal Commission Sea Level Rise Policy Guidance. Adaptation Action Areas: A Planning Guidebook for Florida's Local Governments.
Two-Zone Regulatory Framework	A dual-zone approach is recommended: (1) Current Hazard Zone (based on FEMA and refined wave modeling), and (2) Future Adaptation Zone (based on SLR projections). Review referenced CA LCP SLR Guidance document. Both CA and Florida (FL) use a two-tier system for resiliency planning and adaptation to ensure the SLR planning doesn't override National Flodd Insurance Program (NFIP) requirements.
SLR Assessment Methodology	The rules should require scenario-based planning (low, medium, high, extreme), probabilistic modeling, and compound hazard analysis (e.g., storm surge + riverine flooding). Provides the ability to plan for a range of possible future conditions and identify tipping points for adaptation that is customized to the local conditions and community. Review referenced CA LCP SLR Guidance document. Amend WAC 173-26-201(2)(a) to

Topic	Summary of Comments
	require scenario-based SLR analysis in shoreline inventories and environment designations.
Mapping for Hydrodynamic Coastal Hazard Zones	Hydrodynamic analysis should be emphasized over simplistic “bathtub” GIS static water level analyses which are inadequate for development of future SLR hazard zones. Site specific dynamic modeling (e.g., ADCIRC, SWAN) is necessary for VE zones, locations of complex coastal hydrodynamic conditions, and areas subject to waves and overtopping. WAC 173-26-246 refers to mapping of future tidal inundation for SLRHAs. That seems to indicate a simplistic “bathtub” type analysis that won’t align with the implications of the proposed new rules. The juice needs to be worth the squeeze (in this case the juice is the output from the simplistic method, and the squeeze is the regulation). For the goal of community resilience and level of regulations being applied, the juice won’t be worth the squeeze if this type of simplistic method is used. Other states have ventured to better clarify methodology such as the referenced CA LCP SLR Guidance document.
Erosion Hazard Zones	Consider outlining erosion hazard zones for coastal zones similarly as rivers have channel migration zones. The erosion hazard zones would help integrate with proposed new SLR hazard zones. The WAC should also explicitly define and require planning for a broader set of coastal hazards beyond SLR. This includes storm surge, coastal erosion, compound flooding, groundwater rise, and saltwater intrusion. Clear definitions will improve consistency in local SMP implementation and hazard mapping.
Adaptive Management	The SMP rules should encourage approaches that utilize adaptive design with clear triggers for retreat, elevation or redesign. The methods should be outlined in a technical guidance document. Review referenced CA LCP SLR Guidance document.
Multi-hazard Approach & Vulnerability Assessments	SMP updates should better define, outline and assess multi-hazards as a critical element of resiliency planning when considering SLR and climate change. The multi-hazards may represent a greater risk and result in differing resilience and adaptation planning. They may require the use of scenario-based planning tools (see other related topic comment). Consider a requirement for a comprehensive assessment that quantifies not only the physical extent of combined hazards but also the vulnerability of existing and planned development, critical public infrastructure, natural systems, etc. The assessment would include potential physical, economic and social impacts for different future storm and SLR planning scenarios. As currently written, the new rules appear to indicate the broader topic of multi hazards are either implied or optional but they should be considered strongly in the new sea level rise hazard zones.
Cross-Jurisdictional Coordination	SMP updates should be coordinated with hazard mitigation plans, comprehensive plans, and adjacent jurisdictions. How will this relate to zoning and comprehensive plans and requirements. For example, proposed developments within the coastal shoreline zone and risks and requirements. What are the linkages and are those trued up at the same time by the local jurisdiction? How will the SMP requirements be trued up to local building and municipal codes for the SLR planning elements? It’s important that a static water level is not specified for across-the-board compliance but rather incorporates a scenario based, adaptation strategy-based method. Example. There are examples of WA municipalities passing ordinances that outline a future SLR requirement single value that is a requirement for new infrastructure development. It is important that the new rules discourage or

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	eliminate those types of simplistic approaches and walk back those that have already been put into place.
Broader Stakeholder Engagement & Learning from other States efforts.	The states of California, Florida and Maryland (and others) have implemented similar SLR hazard planning at a state level governance and local government implementation. Prior to finalizing the WA rule making, outreach to other states (state and local regulators) and stakeholders would be beneficial prior to finalizing the WA State rules to hear lessons learned, unintended consequences of their regulation and other factors. The outreach work could be beneficial to WA state prior to finalizing the new rules to result in a more effective regulation (with fewer complications to implement) that improves our community resiliency. Good resiliency planning (and regulations outlining those planning requirements) includes not only public involvement but stakeholder engagement. Outreach to other WA areas stakeholders include governmental organizations (municipal, port, other WA state agencies), private sector (corporations, building and contracting associations, residential), and other state governments (CA, FL, etc…) to gain a broad perspective. After the public comment period, there should be outreach to these other non-public entities and documentation of what was heard and how they could be addressed in the rule making process.
Terminology Updates & Clarifications	Future tidal inundation, planning horizon, functional lifespan, adaptive capacity, managed retreat, multi-hazard threat, scenario planning, NFIP, consequences are all terms that are important to the SLR hazard and resiliency planning. Consideration for inclusion of terms and strategies associated with those types of terms should be strongly considered.
FEMA Alignment	SMP hazard assessments must align with FEMA flood zones (for mapping and technical methodology) to avoid regulatory conflicts. Current and future condition zones should be clearly delineated and related to one another. The current rules appear that it is implied but better definition is needed if you are creating a new SLR hazard are (SLRHA) that won't have conflicts with NFIP/FEMA requirements and mapping. Additionally, FEMA flood mapping in many communities is greatly outdated. If FEMA mapping is a basis to project SLR hazards, it may not represent the best available information to develop a SLR hazard area. There may need to be a "true up" of existing FEMA flood mapping to set the base condition in some communities. This will require more funding and time prior to conducting the SLR hazard planning. Outline clear guidance on acceptable levels of precision and uncertainty in the SLR hazard planning.
Subregional Planning for SLR	Consideration for creating a subregional planning nexus for sea level rise and hazard mitigation strategies. In 2024, CA created a regional plan for San Francisco that creates a multi-jurisdictional planning document that provides the guidelines for the local coastal program updates. This could be developed for Pacific Ocean, Puget Sound, Salish Sea and Lower Columbia River. These could be an element of the statewide planning technical guidance document outlined in a prior comment. CA BCDC is an example. Local Sea Level Rise Plans | SF Bay Conservation & Development.
Storm Severity, Intensity & Multi-hazard Planning	Include a clear definition of "increased storm severity" and require scenario-based and probabilistic assessments (e.g., Monte Carlo simulations) to evaluate compound flooding risks that are a high-risk category for our tidal/fluvial urban river systems. Rules should outline for context, but a statewide guidelines document could provide methodologies. This

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	would prevent the use of simplistic “bathtub” type GIS analysis that won’t develop a true understanding of future risks and corresponding mitigation measures.
Nature Based Solutions - SLR	Current rules require a litmus test on urgency of need (imminent danger vs. non-emergency) and risk to structures to allow the approval of some nature-based solutions. This creates conflict for SLR planning as the nature-based systems are inherently designed to minimize the effects of SLR and increased storms and prevent the need for an imminent danger situation that requires an urgency of need test for obtaining a permit. Additionally, the physical processes governing erosion, climate change, multihazards are very dynamic, complex and can change very quickly. The current rules don’t provide any definition for special situations. A complete revision of the nature-based system rules is needed to integrate into short, intermediate and long-term resiliency planning. Right now, the rules are not compatible with the proposed SLR planning. Ecology needs to test examples to help guide the development of these new rules. Example: V-Zones subject to wave action could benefit from nearshore fill beach compatible material placement (meets nature-based definition) to limit the landward movement of a future V zone due to SLR. The existing rules require a need for erosion protection relative to protecting structures from loss.
Nature Based Solutions – Multi-hazard Situations	Current rules require a litmus test on urgency of need and risk to structures to allow the approval of some nature-based solutions. The rules appear to be more focused on residential. The current rules don’t consider multi-hazard risk situations (erosion, SLR, storm intensity, river channel migration and wave erosion at same site). Additionally, they require a direct risk to structures. There should be a broadening of definition of structures to include public infrastructure (such as tide gates, levees, utilities, roads, critical habitat, etc…). There should be an allowance for protecting land if demonstrated a need for SLR and climate change hazard mitigation, protection of critical infrastructure and special situations if demonstrated through coastal and hydraulic engineering analysis. Definition of those types of evaluations could be defined in a statewide technical guidance document. Example Situation: Property is subjective to combination of creek/river channel migration (regulated by SMP) and coastal wave erosion. The two are exclusive of each other and represent a multi-hazard situation if considered together could represent an exponentially increasing risk when compared to the two evaluated independently and separately (which is how current rules treat them).
Enable Flexible Adaptation Pathways	Allow SMPs to include phased or conditional adaptation strategies that evolve over time based on monitoring and trigger points. A good example is outlined in California’s LCP framework supports adaptive management and flexible zoning that can shift as conditions change. Add language to WAC 173-26-201(2)(e) and WAC 173-26-090 encouraging adaptive pathways and periodic reassessment.
Cross agency jurisdiction and regulatory frameworks	The Growth Management Act (GMA) is described as “the integrating framework for all other land-use related laws,” including the SMA, and calls for consistency among local comprehensive plans and shoreline master programs (SMPs). Has Ecology tested the proposed new rules related to integration with other regulatory frameworks such as comprehensive plans and projected growth management plans to ensure compatibility and limit unintended consequences? Example. A future SLR hazard area is delineated using overly conservative tools (such as a simple bathtub analysis) that shows a conflict with NFIP regulations or future urban growth planning areas. Those types of potential conflicts need to be reviewed and minimized before finalizing new rules. The development of

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	technical guidance at the same time as the rule making would help develop commentary and technical guidance that is aligned and collaborative with the new rules. Those don't exist in any of the current guidance documents.
Local jurisdiction SLR and Climate Change Resiliency Planning Efforts	Local communities and Ecology have made investments in SLR/Climate Change planning and strategies prior to the new rule making. It is very likely most of those will not exactly line up with the new rules and requirements that will become part of the local SMPs and will require modification or significant updates. Additionally, there will be procedures required for those to be recognized in the SMP similarly to the habitat restoration plan requirements. There seems to be a very large effort required by local agencies to do significant background studies on area specific physical processes, application of the best available science to a local perspective and development of a adaptation strategy development that will need to be done in advance of the SMP code updates. Is there sufficient funding and time allocated to do all that work? It is critical that background studies be done in advance of or in combination of the new SMPs to help inform the nuances of the local community's needs. Otherwise, the regulations will be developed in a disconnected manner and with significant unintended consequences. The strategy for implementation of the new rules should include a concrete plan for sufficient funding, guiding technical documents from the state, and reasonable timelines to get the regulations correct. Otherwise, the regulations could significantly affect our community resiliency and result in loss of economic development through a regulatory bureaucracy.
Administrative Updates & Resiliency of Regulations for the intended purpose	Conducting SLR planning is area specific, inherently complex as more regulations are imposed, and time and funding intensive. Ecology should provide a mechanism for local jurisdictions to conduct administrative level updates based on new data, without requiring a full SMP update. This would be consistent with SLR planning best guidance. If the intent is for our communities to be developing resilient plans that are adaptable to changing conditions…so should the rules associated with the regulations. One relates to the other and should not be disconnected. The comment is specific to administrative level changes but also across all the new rules…they should be run through a test to determine if the regulation is as resilient and adaptable as the intended purpose. The juice needs to be worth the squeeze.
Setbacks & Buffers	How will setbacks and buffers be treated relative to the new SLR hazard zones? If they will apply without ability for adaptation strategies or implemented based on scenarios, it will result in a substantial expansion of regulatory authority over property development opportunity and value. This comment points back to other comments regarding the need to build flexible adaptable pathways, scenario planning but also points to the importance of detailed analysis needed if a heavy regulation with enforceable standards will apply to uses for a future hazard that has wide variability of potential based on best available science.
Water Dependent Uses & SLRHP Area	Are water dependent uses given continued priority if located in a sea level rise hazard planning area if there is a vulnerability assessment and corresponding scenarios based adaptation strategy? It is important water dependent uses be allowed to continue in the hazard area but with strategies implemented to minimize risks. If not, we will lose our waterfront industrial and commercial water dependent use areas that are already in short supply. Example. The rules currently state to avoid new structures located in the SLR hazard zone. Why state avoid if it can be demonstrated through planning the new structures can be built in a resilient manner. That regulation is a good example of pre-

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	determining an outcome for a planning process; it appears to be an example of regulatory over-reach. Instead, it should state water dependent uses require infrastructure close to the water and should be avoided unless a scenario-based adaptation strategy for the new construction can be developed. As currently written, it may set the standard for no except under unusual circumstances. Instead, it could say that zone is high risk and should be avoided unless a resiliency adaptation strategy is first developed. It is a shift in tone but an important one.
Fill Waterward of OHWL	Fill waterward of Ordinary High Water are currently written as a conditional use. Nearshore fill is a strategic SLR adaptation strategy in some coastal areas to reduce the impacts of SLR on flooding, erosion and wave overtopping. If resiliency is the goal of these new rules, why would a critical element of resiliency planning require a condition use permit? There should be an exception if it is part of an adopted SLR adaptation strategy plan. A suggest modification…. "*Fill waterward of the OHWM shall require a conditional use permit unless the fill is identified as a preferred or necessary adaptation strategy in a Sea Level Rise Hazard Area assessment conducted under WAC 173-26-246 and incorporated into the local shoreline master program*." There are likely many other examples like this situation that may require condition use under current rules but may require an exception for SLR resiliency planning. Otherwise, the goals of resiliency are not aligned with the standards outlined in the regulations and rules.
Feasibility Determination	Who determines feasibility of adaptation plans to address development in the SLRHP zone? Is it local governments, applicants, ecology or other? There could be a disconnect between regulatory feasibility and operational or financial feasibility. This could be another example of a good topic for the technical guidance document developed by Ecology for use in implemented the SMP updates. Example. "Bridges, utility lines, and other public utility and transportation structures [are allowed] where no other feasible alternative exists or the alternative would result in unreasonable and disproportionate cost or environmental impact". This creates ambiguity and potential conflict between regulatory expectations and the practical realities of waterfront facility operations, where utilities (e.g., power, water, stormwater, fiber, fuel) must often be located within shoreline jurisdiction to serve vessels, cargo handling, and safety systems.
General Comments	When compared to other state level regulations, the proposed rulemaking appears to have a focus on science and light on the topics of risk and adaptation strategies. Although there is best available science, that science is subject to change and revision further out in time the planning horizon extends. Risks and adaptation strategies are better defined and can be developed for a range of scenarios that are based on science. Comment is to provide a better balance in the rules and then develop the state level planning technical guidance to improve the regulations and the resiliency planning goals.
Future Proofing Development Standards	Require new development and significant redevelopment in vulnerable areas to incorporate future climate conditions (SLR + increased storm severity) into their design, siting, and construction standards (e.g., higher freeboard requirements, dynamic setbacks, flood-resistant materials, restrictions on critical infrastructure in high-risk zones). Use of the term

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	and method of future proofing should be considered. This would be part of the defined adaptation strategies and shouldn't be a conditional use.

References.

Florida. Adaptation Action Areas: A Planning Guidebook for Florida's Local Governments.

California. California Coastal Commission Sea Level Rise Policy Guidance

BCDC. Local Sea Level Rise Plans | SF Bay Conservation & Development

Table 2 - WAC Rule Reference by Comment

Comment Topic	Relevant WAC Section(s)	Notes
Professional Qualifications	WAC 173-26-020 (Definitions: Qualified Professional), WAC 173-26-226, WAC 173-26-231	Defines "qualified professional" for various hazard types; could be more explicit about coastal engineers.
State Level Technical Guidance Manual	WAC 173-26-246(12)	Requires Ecology to provide technical guidance and maintain up-to-date scientific information.
Two-Zone Regulatory Framework	WAC 173-26-246(6)(e), WAC 173-26-246(7)(a)	Rules require mapping of SLR hazard areas and future tidal inundation, but do not mandate a two-zone system.
SLR Assessment Methodology	WAC 173-26-246(6)(b)-(c), WAC 173-26-201(2)(a)	Requires scenario-based planning, probabilistic modeling, and compound hazard analysis.
Mapping for Hydrodynamic Coastal Hazard Zones	WAC 173-26-246(6)(b)-(c), WAC 173-26-246(7)(a)	Requires mapping, but does not prohibit "bathtub" methods; dynamic modeling is encouraged.
Erosion Hazard Zones	WAC 173-26-226(1)(b)-(c), WAC 173-26-246(6)(b)-(c)	Erosion, storm surge, compound flooding, groundwater rise, etc., are included in multi-hazard assessment.

Comment Topic	Relevant WAC Section(s)	Notes
Adaptive Management	WAC 173-26-246(3)(d), (6)(d), (7)(b), (8)(q), WAC 173-26-090	Requires adaptive management, phased adaptation, and periodic review of SLR hazard areas.
Multi-hazard Approach & Vulnerability Assessments	WAC 173-26-246(6)(b)-(c), WAC 173-26-226(1)(b)-(c)	Requires multi-hazard vulnerability assessments and scenario-based planning.
Cross-Jurisdictional Coordination	WAC 173-26-191(1)(d), (e), (g), WAC 173-26-246(6)(vi), (11)	Requires integration with comp plans, hazard mitigation plans, and regional coordination.
Broader Stakeholder Engagement & Learning from Other States	WAC 173-26-090(3)(b), WAC 173-26-246(5)	Requires public participation, engagement with Tribes, and encourages learning from other states.
Terminology Updates & Clarifications	WAC 173-26-020, WAC 173-26-246(6)-(7)	Many new terms are defined (e.g., “future tidal inundation,” “adaptive capacity,” “functional lifespan”).
FEMA Alignment	WAC 173-26-246(6)(b)-(c), WAC 173-26-226(1)(v), WAC 173-26-246(7)(b)	Requires SMPs to consider FEMA mapping and ensure consistency with federal requirements.
Subregional Planning for SLR	WAC 173-26-246(11), WAC 173-26-191(1)(g)	Encourages regional and subregional planning and coordination.
Storm Severity, Intensity & Multi-hazard Planning	WAC 173-26-246(6)(b)-(c), WAC 173-26-226(1)(b)-(c)	Requires scenario-based and probabilistic assessments for compound flooding and storm severity.
Nature Based Solutions – SLR	WAC 173-26-231(3)(a)-(g), WAC 173-26-246(7)(c), (8)(f)-(g)	NBS are referenced, but rules still tie some NBS to “urgency of need” for permits.
Nature Based Solutions – Multi-hazard Situations	WAC 173-26-231(3)(a)-(g), WAC 173-26-246(7)(c), (8)(f)-(g)	NBS for multi-hazard adaptation are referenced, but rules may not fully address all scenarios.

Comment Topic	Relevant WAC Section(s)	Notes
Enable Flexible Adaptation Pathways	WAC 173-26-246(3)(d), (6)(d), (7)(b), (8)(q), WAC 173-26-090	Requires phased adaptation, adaptation pathways, and periodic reassessment.
Cross Agency Jurisdiction and Regulatory Frameworks	WAC 173-26-191(1)(e)-(g), WAC 173-26-246(11)	Requires integration with GMA, comp plans, and other regulatory frameworks.
Local Jurisdiction SLR and Climate Change Resiliency Planning Efforts	WAC 173-26-246(6)-(7), WAC 173-26-090	Requires local planning, background studies, and periodic review; funding not addressed.
Administrative Updates & Resiliency of Regulations	WAC 173-26-090, WAC 173-26-246(3)(d), (6)(d)	Allows for periodic review and updates; administrative update mechanisms not fully detailed.
Setbacks & Buffers	WAC 173-26-226(2)(d), WAC 173-26-246(8)(k), WAC 173-26-211(4)(a)(iv)	Setbacks and buffers are required, with some flexibility for adaptation strategies.
Water Dependent Uses & SLRHP Area	WAC 173-26-246(8)(j)-(k), WAC 173-26-241(3)(j), WAC 173-26-211(3)(c)	Water-dependent uses are allowed in SLR hazard areas with adaptation strategies.
Fill Waterward of OHWL	WAC 173-26-231(3)(g), WAC 173-26-246(8)(f)	Fill waterward of OHWL is a conditional use, with exceptions for SLR adaptation not explicit.
Feasibility Determination	WAC 173-26-231(3)(e), WAC 173-26-246(8)(f)-(g)	Feasibility is determined by local government, with some ambiguity remaining.
General Comments (Risk & Adaptation)	WAC 173-26-246(6)-(8), WAC 173-26-201(2)(a)-(c)	Rules focus on science, but adaptation and risk strategies are also included.
Future Proofing Development Standards	WAC 173-26-246(8)(p), WAC 173-26-241(3)(j), WAC 173-26-226(2)(d)	Requires new development to incorporate future climate conditions and adaptation strategies.