

# Kenneth Zirinsky

Dear Department of Ecology,

I am writing to provide input on the proposed updates to the Shoreline Management Act (Chapters 173-18, 173-20, 173-22, 173-26, and 173-27 WAC). I strongly support strengthening these rules to better protect Washington's shorelines, fish and wildlife habitat, and communities in the face of climate change.

First, I urge Ecology to help meet the requirements of HB1181, which calls for improved state response to climate change. The updated rules should include clear definitions and language to protect sea level rise hazard areas and groundwater inundation areas so that shoreline development does not put communities or ecosystems at greater risk.

It is also essential that assessments of cumulative impacts include both permitted and unpermitted uses. Ignoring unpermitted development results in incomplete analysis and undermines the intent of shoreline protections.

Despite longstanding mitigation policies, shoreline ecosystems continue to degrade. To address this, Ecology should:

Require robust monitoring and reporting to track progress toward "no net loss."

Hold local jurisdictions accountable for meeting these requirements.

When mitigation plans fail, require additional corrective strategies to ensure real results rather than allowing continued decline.

One of the most serious threats is unpermitted shoreline armoring, which reduces ecosystem functioning, blocks public access, and harms critical salmon and orca habitat. Ecology should establish statewide, comprehensive enforcement and compliance measures to prevent conflicts of interest at the local level. Strong tools should include punitive fines for unpermitted docks, bulkheads, and armoring; mandatory removal and remediation orders; and potential contractor license loss for repeated violations.

Finally, aquaculture operations must be managed for sustainability. Ecology should evaluate the cumulative effects of aquaculture within each jurisdiction, require periodic reporting on no net loss (NNL) measures, and ensure that aquaculture practices truly achieve NNL of ecological functions.

By taking these steps, the Department of Ecology can uphold the principles of the Shoreline Management Act, meet the state's climate goals, and ensure that future generations inherit healthy, resilient shorelines.

Thank you for considering these comments.

Sincerely,  
Kenneth Zirinsky

Tacoma, WA