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Hello, please see my comments below in several areas:

1) Sea level rise and increased storm severity

- a) New language must direct local governments and municipalities to define Sea Level Rise Hazard Areas, Future Tidal and Groundwater Inundation Areas, and Frequently Flooded Areas. This is a fundamental step in meeting the requirements of HB 1181.
- b) That said, Ecology must specifically define these areas so there is less variability in how local jurisdictions interpret information. It also creates better consistency in how these areas are managed.
- c) Ecology must be more specific in their language around "affected Tribes". Local jurisdictions should not define what "affected Tribes" means.
- d) Local jurisdictions must complete a Sea Level Rise Vulnerability and Risk Assessment. This assessment must also depict how the various shoreline hazard areas are designated and managed.

2) Achieving no net loss of ecological function

- a) DOE must hold to the strong language added around "No Net Loss" of ecological function.
- b) New language must include the expansion, clarification, and additions of subsections to WAC 173-26-226 Protection of critical areas and shoreline ecological functions.
- c) DOE should add language that alludes to achieving a gain of ecological function such as "...that ensure, at a minimum, no net loss of ecological functions...". These additions serve an important reminder that the "No Net Loss" value system is being recognized and acted upon throughout the programs.

3) Effective enforcement and compliance

- a) DOE must be extremely clear and more specific in these documents how SMA regulations and guidance are monitored for compliance and enforced (using actors, timelines, consequences, appeals, etc to make the process clear for all stakeholders).
- b) DOE should add a new section outlining the process for a permit recission by either the local jurisdiction or the state.
- c) DOE should add a new section stating that violators are financially liable for removal of the unpermitted activity AND the cost of restoring the affected area.
- e) The order for removal and remediation also be clearly stated as applicable to unpermitted structures.
- f) DOE should retain the provision about citizen or civil suits in this section to hold violators accountable at the local AND state level.
- g) DOE should gather information from local jurisdictions on any exemptions and substantial development permits -- this will be important for public transparency and accountability. DOE should commit to publishing this information online (in an accessible format) to more readily track and enforce "No Net Loss" of ecological functions. I encourage this information to be translated into the key languages used throughout the state.

Thank you for incorporating these comments.