ISLAND COUNTY MARINE RESOURCES COMMITTEE
www.islandcountymrc.org

Department of Ecology Shorelands & Environmental Assistance Program
Rebecca Rothwell
P.O. Box 47600
Olympia, WA 98504-7600

November 10, 2026
Subject: Proposed Shoreline Management Act Rule Revisions

Dear Ms. Rothwell,
We are pleased to submit this comment letter regarding the proposed changes to the rules for the Shoreline Management Act. The Island County Marine Resources Committee (MRC) is a volunteer advisory body established in 1999 to protect and restore marine resources in Island County, Washington, through scientific monitoring, restoration projects, and community education. We have actively participated in the update to the County's current Shoreline Master Program, as well its comprehensive plan and other land use and environmental documents. In our work we have identified several key issues that are critical to environmental health and sustainability. We are pleased to see that the proposed rulemaking has addressed many of these issues. We would like to make particular note of two changes identified as revisions impacting the regulated community.

c. Shoreline stabilization and flood hazard reduction measures. Projects that include shoreline stabilization or flood hazard reduction measures will now have a specific set of consistent permit submittal requirements including a geotechnical, alternative analysis, and ecological impact report. Project proponents will no longer be able to apply for after-the-fact permits for hard shoreline stabilization measures installed as an emergency measure.

The MRC recognizes the importance of this issue and documented it in a survey of hard armoring throughout the county. We stressed the importance of this issue in the next update of the shoreline master program.
https://www.islandcountymrc.org/media/oqidnhsh/071724-shoreline-armoring-survey-and-permit-analysis.pdf

e. Sea level rise and increased storm severity. New statutory requirements for sea level rise planning will affect what is included in local planning and permitting and will modify what is required or allowed for new uses or development proposed by regulated parties in shoreline jurisdiction. Aligning with the high-level principles for addressing the impacts of sea level rise will likely require changes for the local governments in how they approach shoreline planning for areas with sea level rise exposure, and changes for the regulated communities proposing development in these areas. Entities proposing development in areas exposed to sea level rise will likely need to meet new standards after they are adopted into master programs. Updated master programs may include additional submittal requirements for projects proposed in areas exposed to sea level rise

hazards, as necessary to ensure that sea level rise policies and regulatory requirements are met at the project scale.

The MRC prepared a white paper on this subject and has presented it frequently in addressing proposed regulatory changes at the local level. https://www.islandcountymrc.org/media/21254/20231106-mrc-climate-change-white-paper.pdf

There are many other proposed changes that we strongly support as well. But we wanted to call out these changes as being particularly impactful in future planning.

Thank you again for the opportunity to comment.
Sincerely,



Kelly Webb, Chair
Island County Marine Resources Committee