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Whidbey Environmental Action Network Comment on Proposed Shoreline Management Act Rule Amendments

November 5th, 2026

ATTN: Rebecca Rothwell, Rulemaking Lead Washington State Department of Ecology, Shorelands and Environmental Assistance Program PO Box 47600, Olympia, WA 98504-7600
Submitted via shorelinerulemaking@ecy.wa.gov

Re: Proposed amendments to Chapters 173-22, 173-26, and 173-27 WAC (Shoreline Management Act rulemaking)

Dear Rebecca Rothwell:

The Whidbey Environmental Action Network (WEAN) appreciates Ecology's engagement with WEAN and our nonprofit partners throughout this rulemaking. We support Ecology's work to carry out the Legislature's direction in E2SHB 1181 (RCW 90.58.630), which requires Ecology to update the SMP Guidelines so that local shoreline master programs address sea level rise and increased storm severity. To fully deliver on that mandate, we urge Ecology to strengthen the proposed rule. As drafted, several provisions rely on discretionary language ("may," "should," "to the extent information is available") that would allow consequential decisions to be deferred, weakened, or applied inconsistently from one jurisdiction to the next.

WEAN is a community-based environmental advocacy organization on Whidbey Island. For more than three decades we have worked to protect the ecosystems of Island County. We routinely review and comment on shoreline permit applications, including bulkhead repairs, docks, septic systems, and restoration projects. Our recommendations are grounded in that permit-level experience, where the guidelines in Chapter 173.22, 173-26, 173.27 WAC are tested in their ability to effectively preserve shoreline ecological functions.

Specifically, the implications of the proposed amendments to the SMP Guidelines (Chapter 173-26 WAC) and the permit and enforcement rules (Chapter 173-27 WAC) will be rapidly and acutely realized in Island County. Our comments are organized under three headings: (1) sea level rise and storm severity, (2) no net loss and riparian protections, and (3) enforcement and compliance. A summary table of requested amendments follows the conclusion.

Why This Rulemaking Matters for Island County

Island County's Shoreline Master Program covers roughly 210 miles of shoreline (WA Department of Ecology 2016). The county has the second-highest percentage of shoreline parcels in Puget Sound and the second-greatest share of Sound-wide forage fish spawning parcels

(Island County Shore Friendly Program). Few jurisdictions will feel the strengths or weaknesses of this rule more directly.

Eroding bluffs are the county's sediment supply. Much of Whidbey and Camano Islands is fronted by bluffs of unconsolidated glacial and interglacial sediments. Many are mapped as feeder bluffs, whose gradual erosion supplies the sand and gravel that build and sustain downdrift beaches, spits, and barrier lagoons (Shipman 2004; Johannessen and MacLennan 2007). Rising seas increase wave attack at the bluff toe, and accelerate modeled rates of bluff retreat (Walkden and Dickson 2008; Ashton et al. 2011). These bluffs are also hazardous: the 2013 Ledgewood landslide on Central Whidbey affected roughly 30 homes and destroyed 400 ft of road in a single event.

Nearshore habitats are low-lying and cannot move if they are boxed in. Crockett Lake, Deer Lagoon, Cultus Bay, Useless Bay, Maxwelton, Livingston Bay, and Port Susan marshes are barrier-embayment and salt marsh systems close to current high tide elevations. Pocket estuaries along Whidbey Basin provide rearing habitat for juvenile Puget Sound Chinook salmon from the Skagit, Stillaguamish, and Snohomish rivers (Beamer et al. 2003). Surf smelt and Pacific sand lance spawn in the upper intertidal zone of the county's beaches (Penttila 2007). As sea level rises, these habitats must migrate landward or they will be lost. Where that path is blocked by armoring, roads, or structures, the result is "coastal squeeze": the progressive narrowing and eventual loss of intertidal and marsh habitat in front of fixed infrastructure (Pontee 2013).

Projected sea level rise is substantial. The Washington Coastal Resilience Project predicts relative sea level rise of roughly 1.5 to 2 feet by 2100 in north Puget Sound at central likelihoods under higher emissions, with low-probability, high-consequence outcomes exceeding 4 feet (Miller et al. 2018). Storm surge and waves will ride on top of that higher baseline. Thus, flooding and erosion that are rare today will become more frequent within the design life of structures being permitted now.

Armoring is already widespread and largely unpermitted. Shoreline armoring degrades beach structure, sediment supply, riparian vegetation, wrack, and wildlife habitat (Rice 2006; Dethier et al. 2016). An Island County Marine Resources Committee analysis found that of approximately 14,100 feet of new armoring installed in the county from 2016 to 2023, roughly 85 percent had no approved permit. Of the 7,864 feet of armoring placed on forage fish spawning habitat, only about 4 percent was permitted (Herrera Environmental Consultants 2024). Shoreline rules that rely on local discretion and voluntary compliance will not reverse that trend.

1. Sea Level Rise and Storm Severity

WAC 173-26-246 is the section that most directly carries out the Legislature’s directive in E2SHB 1181 (RCW 90.58.630) that shoreline master programs address sea level rise and increased storm severity. To fulfill that directive, the rule must do more than require local governments to identify sea level rise hazards and habitat migration areas. It must ensure those

findings shape where and how development occurs. Proposed additions are shown in **bold**; proposed deletions in ~~strikethrough~~.

1.1 Protect the areas where habitats will need to migrate

The vulnerability assessment must identify areas where habitats will migrate (WAC 173-26-246(7)(ii)) and section (9)(b) addresses implementation, but the rule stops short of requiring that those migration areas be protected. Identification without protection allows the same parcels to be developed or armored, exacerbating coastal squeeze. We suggest:

- In WAC 173-26-246(9)(b): "**Where feasible, local governments must protect areas where habitats, including native vegetation communities, will migrate due to sea level rise.**"
- In WAC 173-26-246(7)(c)(iii): vulnerability assessments **shall also identify where new development should be avoided to allow for landward habitat migration and to prevent the coastal squeeze that causes loss of shoreline ecological functions.**

Scientific basis. Salt marshes and beaches persist mainly by moving landward and upward as the sea level rises. Where accommodation space is lost to fixed structures, marsh and intertidal area decline even when sediment supply is adequate (Pontee 2013; Kirwan et al. 2016). Vegetation is explicitly named in the proposed language because marsh plants, dune grasses, and marine riparian trees are the structures that trap sediment, shade spawning beaches, and supply wrack to the nearshore food web (Brennan and Culverwell 2004; Rice 2006).

1.2 Apply avoidance to replacement and redevelopment, not only new development

WAC 173-26-246(8)(a)(ii) restricts new development in areas exposed to sea level rise hazards but does not reach the expansion, replacement, or redevelopment of existing primary structures. Most of Island County's exposed shoreline is already platted and developed, so the long-term pattern of risk will be set by what is rebuilt, not only by what is new. We request:

- In WAC 173-26-246(8)(a)(ii): restricting new development **and the expansion, replacement, or redevelopment of existing primary structures** within areas exposed to sea level rise hazards.
- In WAC 173-27-040(3): "**Replacement shall not be allowed in high hazard areas.**"

Scientific basis. Each rebuild resets the clock on a structure's design life and on the armoring that protects it, extending the period of habitat impact by decades. Planned relocation at the point of redevelopment is the lowest-cost opportunity to reduce exposure (Siders et al. 2019).

1.3 Extend shoreline jurisdiction to include critical area buffers

To the extent allowable by law we request that shoreline jurisdiction ends 200 feet landward of the ordinary high water mark, and on many Island County bluffs that line falls at or near the bluff

crest. Landslide and erosion hazards, and the setbacks needed to address them, routinely extend farther inland. We request that WAC 173-22-040(4)(b) read: "The local government **shall** ~~may, at its discretion,~~ include within shorelands lands necessary for buffers for critical areas, including the critical area itself." This change is essential for the marine bluff buffer requested in Section 1.6 to be applied under the SMP.

1.4 Require spatially explicit regulatory tools for areas exposed to sea level rise

We request that WAC 173-26-246(9)(a) read: "Local governments **should use** ~~must determine if they need~~ spatially explicit regulatory tools for these areas, such as establishing a critical area, a type of environment designation, or a parallel environment designation." These tools should apply to all *areas exposed to sea level rise hazards*, which include but are not limited to designated critical areas. Without a mapped overlay, the prohibitions and standards in 246(9)(c) must be applied parcel by parcel, which is slow, inconsistent, and difficult to defend.

1.5 Restore statewide project-level sea level rise permit requirements

The preliminary draft included project-level submittal requirements that were removed from the proposed rule. We ask Ecology to restore them by reviving WAC 173-27-185 or adding to WAC 173-27-180:

"**Applications for development in areas exposed to sea level rise hazards shall identify the projected sea level rise at the site over the life of the development under the scenarios in WAC 173-26-246(5)(b), and shall demonstrate that the most precautionary adaptation alternative that is feasible and applicable has been selected.**"

We also request that WAC 173-26-246(10) be changed from "should specify" to "**shall specify**." Sea level rise planning is ultimately implemented one permit at a time. Leaving submittal standards to each jurisdiction invites uneven results across neighboring counties that share the same drift cells and coastal hazards.

1.6 Establish a default erosion buffer for marine bluffs

As aforementioned, protecting the structural and ecological integrity of coastal bluffs is a major concern in Island County. We ask Ecology to add to WAC 173-26-221(2)(e)(ii)(E)(I):

"**In the absence of a geotechnical analysis projecting bluff retreat with sea level rise over the life of the development, the erosion hazard buffer for marine bluffs shall be no less than 200 feet from the top of the bluff, plus landslide runout and side buffers.**"

We further request that local governments with marine bluffs be required to **analyze projected bluff recession over the next 100 years, including the effects of sea level rise, and use that analysis in setting buffers and environment designations.**

Scientific basis. Puget Sound bluff retreat is episodic: long periods of slow bluff toe erosion are punctuated by landslides that can remove tens of feet of bluff in a single event (Shipman 2004). Historical average rates therefore understate risk over a structure's life. Process-based models show that retreat accelerates as the rate of sea level rise increases, because waves reach the bluff toe more often and clear talus faster (Walkden and Dickson 2008; Ashton et al. 2011). A precautionary default protects homeowners from building where their structure will later be threatened. It also protects feeder bluff sediment supply, because threatened structures are the main driver of bluff-toe armoring. Applicants remain free to justify a smaller buffer with site-specific geotechnical analysis. This provision relates directly to the amendments presented in Section 1.3.

1.7 Site new armoring relative to the future, not the current, shoreline

The proposed rule has no provision accounting for sea level rise in the placement of hard armoring. We request that WAC 173-26-231(4)(c)(iv)(E) read: "New and expanded hard shoreline stabilization can only be authorized in locations at or landward of the ~~existing~~ ordinary high water mark **under the long-term sea level rise scenario**."

Scientific basis. Armoring placed at today's ordinary high water mark will sit progressively lower in the intertidal zone as the sea rises. Wave reflection, scour, and loss of the upper beach will increase over time, burying or eliminating forage fish spawning substrate (Dethier et al. 2016).

2. No Net Loss and Riparian Protections

No net loss of shoreline ecological functions is the central standard of the SMP Guidelines, and the best available science shows it is not being achieved. In its 2022 report to the Legislature, WDFW concluded that "evidence of ecosystem decline in Washington indicates that NNL is not working," and that inconsistent implementation and enforcement have produced "little to no monitoring and reporting of its impacts" (WDFW 2022).

The causes WDFW identified map directly onto this rule. Experts consulted for the report cited undefined baselines, no clear metrics for success, insufficient monitoring, "a persistent lack of accountability and enforcement, which exacerbates noncompliance," and a failure to monitor "the cumulative impacts of legacy development, variances and exceptions, and illegal development" (WDFW 2022, p. 21). The requests below respond to those findings; they would make no net loss measurable, account for all sources of loss, and keep the standard meaningful as shorelines move landward.

2.1 Make each periodic update test whether no net loss is being achieved

Every 10-year SMP periodic update should include an evaluation of whether the program is achieving no net loss. We propose a phased approach:

1. In the 2029-2034 updates, counties and cities determine whether authorized development, uses, and activities achieved no net loss.
2. In the following round of updates, counties and cities use the tracking system required by WAC 173-26-090(b)(iii)(D)(II) to determine whether **both authorized and unauthorized** development and activities achieved no net loss.

A standard that is never measured cannot be enforced or improved. The phased approach gives jurisdictions time to build tracking capacity while ensuring that, by the second cycle, the evaluation reflects conditions on the ground.

2.2 Count every source of impact in cumulative impacts analysis

Cumulative impacts analysis is currently required for only a narrow set of activities, and it omits the activities that most often drive loss. **Exempt, illegal, and all other unapproved activities must be included in cumulative impacts evaluations.** In Island County, 85 percent of new armoring was unpermitted (Herrera Environmental Consultants 2024). Therefore, an analysis limited to permitted work would omit a majority of the impact. Shoreline degradation in Puget Sound is overwhelmingly the product of many individual, minor actions, which is precisely what the cumulative impacts analysis intends to quantify (Simenstad et al. 2011; Dethier et al. 2016). Therefore, unpermitted work must be included in the cumulative impact assessments.

2.3 Define what "functionally equivalent" to a Riparian Management Zone allows

WAC 173-26-221(6)(b)(iii)(A) provides that the 200-foot shoreland area is to be "considered to be functionally equivalent to a Riparian Management Zone described within the Department of Fish and Wildlife's Riparian Ecosystems, Vol. 1 and 2." We support this framing, but the rule should specify what level of activity is appropriate. **The provision should set standards for allowed clearing, uses, structures, and impervious surface that are consistent with maintaining riparian functions, including wildlife habitat.** Without those standards, "functional equivalence" becomes a label that can be attached to almost any development.

2.4 Remove the "if data exist" escape hatches

We request that Ecology:

- Strike "for which information is available" in WAC 173-26-246(4)(a).
- In WAC 173-26-246(6), replace "to the extent such information is reasonably available" with "**using the best available information, in coordination with the department, consistent with subsection (7).**"

Ecology already applies a best-available-information standard in 246(7). These edits make the rule internally consistent and prevent a jurisdiction from avoiding analysis because it has not collected the data.

2.5 Set a riparian buffer floor for fish-bearing rivers and streams

We request that Ecology add to WAC 173-26-221(5)(c)(i):

"**For fish-bearing rivers and streams, shoreline buffers shall be no less than one 200-year site-potential tree height, measured from the ordinary high water mark or the outer edge of the channel migration zone, whichever is greater, consistent with the Department of Fish and Wildlife's Riparian Ecosystems, Volume 2.**"

Scientific basis. WDFW's synthesis of best available science identifies the 200-year site-potential tree height as the zone within which riparian areas provide full function for wood recruitment, shade, bank stability, pollutant removal, and habitat (Quinn et al. 2020; Rentz et al. 2020). Because 221(6)(b)(iii) already treats the shoreland area as a WDFW Riparian Management Zone, a buffer floor drawn from the same source is a logical and consistent step.

2.6 Restore mitigation monitoring and reporting

The proposed rule strikes wetland mitigation language requiring performance standards, long-term monitoring and reporting procedures, and long-term site protection. That language should be reinstated. We also request that Ecology add to WAC 173-26-206(3)(h):

"**Compensatory mitigation shall include performance standards, monitoring of no less than five years (ten for forested systems), contingency and corrective actions, and annual monitoring reports submitted to the local government and transmitted to the department through the shoreline permit tracking system.**"

Scientific basis. No net loss is only as reliable as the mitigation used to achieve it. Evaluations of compensatory wetland mitigation on state and national levels have repeatedly found that a large share of projects fail to meet their goals, most often because performance was never monitored or corrective action was never taken (NRC 2001; Johnson et al. 2002).

WEAN's own review of mitigation in Island County exemplifies this issue. After examining 163 county mitigation projects from 2014 to 2024, WEAN's data analyst found that 48.5% had no documented follow-up or monitoring after installation, and 50.3% lacked an as-built report (Bluemer 2026). Of the 74 projects that should have been completed within the study period, 10 (13.5%) were procedurally complete, had a final monitoring report, and met their success criteria. Furthermore, only 16.6% documented full mitigation sequencing. Wetlands and their buffers absorbed the largest share of impacts; roughly 1.09 million square feet over the decade.

Regardless of whether these gaps reflect noncompliance or poor recordkeeping, the result is the same: neither the County nor the public can verify that required mitigation was delivered. These gaps exist even though WAC 173-26-201 already calls for "monitoring the impact and the compensation projects and taking appropriate corrective measures." Striking the monitoring and reporting language from the rule exacerbates this issue.

2.7 Build climate change into critical area standards and restore channel migration zones

We request a new general standard at WAC 173-26-221(2)(c)(x):

"**Critical area designations, buffers, and protection standards shall account for the projected effects of sea level rise and changing hydrology identified under WAC 173-26-246 and the frequently flooded area provisions, including landward migration of wetlands and critical saltwater habitats.**"

In WAC 173-26-221(2)(e)(vi)(A)(V), we request that "may designate a CMZ" be changed to "**shall designate mapped CMZs**." Critical area boundaries drawn on today's conditions will not protect wetlands, eelgrass, or marshes as they shift. Channel migration zones are already mapped for many rivers and designating them is a low-cost way to avoid placing development in the path of predictable channel movement.

2.8 Require no net loss to be maintained as sea level rises

WAC 173-26-241 could more explicitly address no net loss. We request that Ecology add to WAC 173-26-241(2)(a)(iv):

"Establish use regulations designed to assure no net loss of ecological functions associated with the shoreline. **For local governments required to plan for sea level rise, ensure that local use regulations dynamically account for shifting ordinary high water marks and coastal hazards to maintain no net loss of shoreline ecological functions over long-term planning horizons.**"

The ordinary high water mark will migrate landward over the life of SMPs adopted under this rule. A no net loss baseline fixed to today's shoreline will quietly erode as buffers, setbacks, and habitats are compressed against development.

3. Enforcement and Compliance

Even the most protective shoreline standards cannot achieve their intended outcomes without consistent enforcement. As noted above, Island County data show that most new shoreline armoring is being built outside the permit system (Herrera Environmental Consultants, 2024). The rule should make enforcement an expectation rather than an option.

3.1 Specify when local governments must enforce

The SMP Guidelines should specify the circumstances under which a local government must enforce its shoreline master program. At a minimum, this should include unpermitted development waterward of or within the shoreline buffer, unpermitted shoreline stabilization or in-water structures, and unpermitted clearing of native shoreline vegetation. Today, enforcement depends heavily on local capacity and discretion. Clearly defined enforcement parameters would

provide planning staff with a defensible basis for action and give the public a transparent understanding of when and how shoreline regulations will be enforced.

3.2 Require removal and meaningful penalties for unpermitted armoring and in-water structures

We request that the rule provide:

- Any bulkhead or in-water structure constructed **without prior county, city, or Ecology approval must be removed.**
- Local jurisdictions **must** apply a fine or penalty for unpermitted bulkheads and in-water structures, **of no less than the cost of the unpermitted construction or the cost of its removal, whichever is greater.**
- **After-the-fact permits shall not be issued for shoreline stabilization or in-water structures, other than for emergency construction meeting the narrowed emergency criteria in this rule.**

When the penalty for building without a permit is smaller than the cost and delay of applying, the permit system rewards noncompliance.

3.3 Require annual reporting of violations and their resolution

Local governments should **report annually to Ecology the number of shoreline violations and complaints received, the number resolved and unresolved, and the number of violations remediated.** This information is necessary for the no net loss evaluations requested in Section 2.1 and would let Ecology identify jurisdictions that need technical or enforcement support.

The need for this amendment is evident in Island County. Assembling basic documentation for WEAN's mitigation records review required two public records requests and supplemental searches of the county permit portal, and 26 compliance checklists remain missing (Bluemer 2026). Standardized reporting to Ecology would make this information routinely available rather than dependent on records requests.

3.4 Require financial assurance for compensatory mitigation

Applicants should be **required to post a performance and maintenance bond or escrow account for all compensatory mitigation projects, held for at least five years and released only after ecological performance standards are met.** Financial assurance pairs with the monitoring requirements in Section 2.6: monitoring shows whether mitigation is working, and the bond ensures corrective action is funded when it is not.

In Island County, financial assurance has rarely been used and has not ensured follow-through when it was. Only 6 of the 163 mitigation projects WEAN reviewed involved a bond, and none of the bonded projects submitted a final monitoring report or showed evidence of meeting its

performance standards (Bluemer 2026). Bond release must be tied to documented performance, not to the passage of time.

Conclusion

This rulemaking is the state's opportunity to align shoreline management with the best available science on climate change. For Island County, the success of this update will depend on a few key provisions. We ask that the final rule ensure that habitat migration areas are not only mapped but protected; that marine bluffs receive a precautionary default buffer; that replacement and redevelopment are held to the same avoidance standards as new development; and that no net loss is measured and shoreline regulations are enforced, rather than either being assumed. We urge Ecology to replace discretionary language with clear requirements wherever the protection of shoreline ecological functions depends on it.

Thank you for the opportunity to comment and for Ecology's substantial work on this rule. WEAN would welcome the opportunity to further discuss these recommendations.

Sincerely,



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Summary of Requested Amendments

Section	WAC provision	Requested change
1.1	173-26-246(7)(c)(iii), (7)(i), (9)(b)	Require protection of habitat and vegetation migration areas; identify where development should be avoided
1.2	173-26-246(8)(a)(ii); 173-27-040(3)	Extend avoidance to expansion, replacement, and redevelopment; no replacement in high hazard areas
1.3	173-22-040(4)(b)	"May, at its discretion" → "shall" include critical area buffers in shorelands
1.4	173-26-246(9)(a)	Use spatially explicit regulatory tools for all areas exposed to sea level rise
1.5	173-27-180/-185; 173-26-246(10)	Restore project-level sea level rise submittal requirements; "should" → "shall specify"
1.6	173-26-221(2)(e)(ii)(E)(I)	200-foot default marine bluff buffer absent geotechnical analysis; 100-year bluff recession analysis
1.7	173-26-231(4)(c)(iv)(E)	Site new hard armoring relative to the long-term sea level rise ordinary high water mark
2.1	173-26-090	Phased no net loss evaluation at each periodic update
2.2	173-26-090 / cumulative impacts provisions	Include exempt, illegal, and unapproved activities in cumulative impacts analysis
2.3	173-26-221(6)(b)(iii)(A)	Define allowed clearing, uses, structures, and impervious surface in the Riparian Management Zone equivalent
2.4	173-26-246(4)(a), (6)	Remove "if information is available" qualifiers; apply best available information
2.5	173-26-221(5)(c)(i)	Riparian buffer floor of one 200-year site-potential tree height for fish-bearing streams
2.6	173-26-206(3)(h); wetland provisions	Restore mitigation performance standards, monitoring, reporting, and site protection
2.7	173-26-221(2)(c)(x); 221(2)(e)(vi)(A)(V)	Account for sea level rise in critical area standards; "may" → "shall designate mapped CMZs"
2.8	173-26-241(2)(a)(iv)	Maintain no net loss as the ordinary high water mark shifts

3.1	SMP Guidelines, enforcement	Specify when local governments must enforce
3.2	Chapter 173-27 WAC, enforcement	Mandatory removal of unpermitted armoring and in-water structures; penalties at least equal to construction or removal cost; no after-the-fact permits except emergencies
3.3	Chapter 173-27 WAC, enforcement	Annual reporting of violations, complaints, and resolution
3.4	173-26-206(3)(h)	Performance and maintenance bond or escrow for compensatory mitigation

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