# Ronda Larson Kramer

**Re: Proposed WAC 173-26-246 — Prohibiting New Development in Areas Threatened by Sea Level Rise**

I strongly support Ecology's proposal to address sea level rise in Washington's Shoreline Master Program guidelines. In particular, I urge Ecology to strengthen WAC 173-26-246(8) and (9) to prohibit new non-water-dependent buildings, as well as the expansion, replacement, or redevelopment of existing primary structures, in areas projected to be inundated by sea level rise.

I have a master's degree in urban planning and studied hazard mitigation in graduate school. One of the most important principles of hazard mitigation is that **the most effective way to prevent future disaster losses is to avoid placing development in harm's way in the first place.** Yet local governments continue to approve and encourage development in areas where flooding is foreseeable, often on the assumption that future engineering projects will protect those investments.

Downtown Olympia provides a compelling example of why stronger statewide regulations are necessary.

Much of downtown Olympia, including the Port of Olympia peninsula, is low-lying waterfront land vulnerable to sea level rise, coastal flooding, and related hazards. Nevertheless, the Port continues to consider new development on its peninsula, including hotels, warehouses, and other commercial buildings. Meanwhile, the City of Olympia continues to contemplate and approve substantial investments in vulnerable waterfront areas.

The prevailing assumption appears to be that these areas can be protected indefinitely through engineering solutions, such as seawalls, elevated structures, pumps, and other flood-control infrastructure.

But engineering cannot eliminate the underlying hazard. It can reduce certain risks, often at considerable expense, while creating continuing maintenance obligations and potentially transferring risks elsewhere. Rising groundwater, increasingly frequent tidal flooding, storm surge, and the need to maintain safe access and functioning utilities complicate these solutions further.

More importantly, **every new building constructed in a future inundation area creates another investment that future generations will be expected to protect.** Once a hotel, warehouse, or residential building is constructed, there will be enormous financial and political pressure to spend public money defending it, even when retreat would otherwise be the more economical and environmentally responsible alternative.

This is precisely the cycle that effective hazard mitigation is intended to prevent.

The Port of Olympia peninsula also illustrates an important opportunity. Much of this publicly owned waterfront could instead be used for parks, open space, ecological restoration, and public recreation, in the same way that Oklahoma City's award-winning Scissortail Park transformed a formerly flood-prone industrial area. Public spaces can be designed to accommodate changing shorelines and periodic inundation, without creating the same long-term obligations to protect expensive private buildings.

The choice is not between economic development and doing nothing. Public waterfront parks, trails, gathering spaces, and restored shorelines provide substantial recreational, environmental, and economic benefits. They can attract visitors, support downtown businesses, and improve quality of life while preserving flexibility to adapt to rising seas. Scissortail Park is a model in that regard.

The same cannot be said of permanent buildings constructed in locations that will eventually be inundated.

I am particularly concerned that regulations requiring local governments merely to *consider* sea level rise, assess risks, or adopt adaptation strategies will be insufficient. Local governments already have access to substantial information about sea level rise. The problem is not simply a lack of information. It is that short-term development interests and confidence in future engineering solutions continue to outweigh long-term hazard avoidance.

Ecology should therefore establish clear, enforceable minimum standards that do not leave local governments free to approve new non-water-dependent buildings in areas projected to become inundated simply because an applicant who stands to make a short term profit proposes elevating the building or constructing protective infrastructure.

I urge Ecology to:

1. Prohibit new non-water-dependent primary structures, and the expansion, replacement, or redevelopment of existing primary structures, in areas projected to transition to aquatic conditions under long-term sea level rise scenarios.
2. Ensure that development restrictions address reasonably foreseeable coastal flooding, groundwater rise, and loss of safe access and essential utilities, rather than relying exclusively on projections of future ordinary high water.
3. Prevent engineered flood protection or building elevation from becoming a routine exception to restrictions on new development in high-risk areas.
4. Encourage parks, open space, ecological restoration, and low-intensity public recreation as appropriate uses of vulnerable waterfront property, with facilities designed to accommodate future inundation.
5. Require local governments to consider the long-term public costs of protecting new development, including infrastructure maintenance, emergency response, flood protection, and eventual relocation or removal.

Washington has an opportunity to avoid repeating the costly mistakes of communities that continued building in known hazard areas and subsequently spent enormous sums attempting to protect those investments.

The decisions being made today about waterfront development will have consequences for generations. Buildings constructed now may still be standing 50 or 75 years from now, when the shoreline and the hazards associated with it may be substantially different.

**We should not be constructing the next generation of flood hazards while simultaneously spending public money trying to mitigate the hazards created by earlier development.**

I urge Ecology to adopt strong, mandatory, enforceable restrictions that make hazard avoidance—not perpetual and costly engineered protection—the foundation of Washington's approach to sea level rise.