David Turnoy

Thank you for updating the shoreline master program guidelines. I support the proposed amendments as they were last updated nearly a decade ago and there have been many changes in shorelines and science since the last update in 2017.

Proposed amended Washington Administrative Code (WAC) 173-26-246(8) and WAC 173-26-246(9) must prohibit new non-water dependent buildings and the expansion, replacement, or redevelopment of existing primary structures within areas exposed to future sea level rise. This is needed to protect people and property from damage from sea level rise and increased storm intensities and frequencies.

WAC 173-26-246(6), (WAC) 173-26-246(7), and WAC 173-26-246(9) must require the identification and protection of areas where habitats, wetlands, and aquatic vegetation will need to migrate due to sea level rise. This is necessary to protect the habitats and vegetation on which the shoreline marine environment, salmon, and orcas depend.

WAC 173-26-221(5)(c) must require that fish-bearing rivers and streams shall have buffers 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 State of Washington Department of Fish and Wildlife's Riparian Ecosystems, Volume 2: Management Recommendations. These buffers are needed to protect salmon habitats, water quality, and the orcas that depend on salmon for sustenance.

WAC 173-26-090(2)(b)(iii)(D) must require counties and cities to report to Ecology violations, complaints, and the number of violations and complaints that are resolved each year. This data will allow Ecology to determine if counties and cities are adequately enforcing shoreline master programs and effectively protecting the state's shorelines. Ecology can then provide technical assistance and backup enforcement where needed.