Carly Michaels

Uh, thank you for the opportunity to present today. I''m speaking on behalf of the Washington Public Ports Association. My name is Carly Michaels. I''m the senior environmental policy director, um, at WPDA. Uh, we are gonna plan to submit more-substantial comments, more specifically on different items, but, um, we''re working with our 75 port members to, um, review the rules still. So I''m here providing general comments today.

This rulemaking has significant implications for developed and working waterfronts. Ports recognize the importance of planning for sea level rise and storm severity. Our concern is how these requirements will be implemented while maintaining a central infrastructure, supporting economic development, and providing greater certainty for projects and permitting. Resiliency planning will look different at an operating marine terminal than along other shorelines. We encourage Ecology to explicitly recognize developed, working waterfronts, and water-dependent industrial shorelines through a dedicated classification, or another clear mechanism that accommodates their unique operational and adaptation needs. Ports need practical pathways to maintain, repair, and modernize critical infrastructure. We ask Ecology to consider expanding exemptions or flexibility for appropriate modernization work, along with operational flexibility and targeted exemptions for ports that have Homeland Security requirements, for example.

We also request clear guidance on how the rules will affect water-dependent and water-related uses. Implementation should preserve access to the water and allow essential port activities to continue without unnecessary disruption. For mapping and analysis, we support allowing additional site-specific tools and information alongside CoSMoS that''s in the rule update. Ports should have flexibility to use an analysis that reflects local conditions and infrastructure rather than being limited just to the single model.

Coordination will also be essential. We support language requiring local governments to coordinate directly with port districts as they update their shoreline master programs, which was added into this updated rule. Ports need to be involved early, so those plans reflect existing operations, infrastructure investments, and long-term adaptation needs.

Finally, successful implementation will require resources. We support dedicated funding for technical assistance, guidance, and implementation support for local governments and affected districts. This will be incredibly important for local governments with limited capacity, as they work with their port districts. Our goal is a predictable, workable implementation pathway that advances shoreline resilience while preserving the ability for ports to operate, invest, and serve their communities. We ask Ecology to ensure these updates improve certainty without significantly increasing project costs or disrupting essential waterfront operations. Thank you.