Holly Towle

Thank you. My name is Holly Towle. And, um, I''m just gonna read this letter to you. Uh, first of all, thank you for seeking comments on the proposed amendments. I request that an express statement be added to each of the amend, the WACs being amended, the [unclear]. Um, [unclear], and this is the reading of it, nothing in any of the, I put in the year of the adoption, adopted, and that''s if they are past, uh, to Ecology, and that is the WACs. So nothing in that may be viewed as changing, diminishing, or otherwise adversely impacting homeowners'' rights under RCW, 90.58.100, subsection 6, or homeowner ability, timely and affordably, to obtain enforcement of those rights. And in this letter, I, um, have a shorthand where I call that RCW 98.58.100, subsection 6, confirmation, just to, just to make it easier to refer to why I would like that text.

But this is the reason. I''m a retired lawyer, whose family and neighbors have tried for over five years to obtain a shoreline permit to save our single-family residences from erosion of their beaches on Whidbey Island. Ecology has participated directly and indirectly for all of those years, and has not then and now complied with RC, the RCW, including with its priority for older homes such as ours. The upcoming amendments pay lip service to that RCW but provide so many contrary rules and regulatory powers that it can be read as indirectly denying the RCW protection. So my RCW confirmation suggestion is intended to fix that problem. To illustrate, the RCW states homeowners are entitled to, "structural protection, including the strongest type, such as even a bulkhead, against erosion, and they must spend thousands of dollars to submit massive documentation, e.g., licensed expert opinions, and surveys, et cetera. Yet, in our experience, regulators ignored the studies they mandate and ignore, the studies that they mandate, applicants provide, and substitute a variety of unlicensed views of their own, to delay and ultimately deny permitting.

We''ve had to, I''m going to start going faster. Um, we, uh, actually had to sue Island County and do an appeal. We won the appeal, then we went to Ecology, and it denied our permit flat out, including saying it was denying it to set up precedent for Washington shorelines, as in all of them. So we are the sacred cow, and I guess my time is up, but I brought a letter, and I''ll, um, give you that letter. Who should I give it to?