Brett Veerhusen

Thank you for the opportunity to comment and we appreciate Ecology's work to protect Washington's shorelines while recognizing aquaculture as a preferred use.

Sincerely,
Brett D. Veerhusen
Principal, Ocean Strategies

From: Ocean Strategies, Inc.
Re: SMA rulemaking
Date: November 16, 2026

Ocean Strategies is a marine resources consulting firm based in Seattle, Washington. Washington's tidelands are a distinctive part of the state's coastal environment. For more than 100 years, shellfish farming -- and more recently, small-scale seaweed farming -- has contributed to Washington's heritage, rural economies, and environment. The Shoreline Management Act (SMA) recognizes aquaculture as a preferred use while establishing protections that can, at times, make it challenging for existing farmers to continue operating and new farmers to enter the market.

As the Washington State Department of Ecology updates its shoreline management rules, we would like to recognize the strengths of the proposal and identify opportunities for clarification that would improve transparency and help county planners carry out their responsibilities.

Sea-Level Rise and Local Implementation

First, we support the proposed sea-level-rise provisions and their focus on preparing Washington for the effects of climate change. At the same time, these provisions may place significant demands on local governments and will require ongoing guidance and support from Ecology. Their implications for existing and future aquaculture operations remain uncertain and may depend on how counties implement them. We are also concerned that additional requirements could increase the workload of county planners without corresponding resources. We encourage Ecology to keep initial implementation requirements as straightforward as possible, with additional measures introduced as specific needs or deficiencies become clear.

County Capacity and Predictable Reviews

Counties and municipalities have long struggled to complete required Shoreline Master Program (SMP) reviews. Jefferson, Skagit, and Thurston Counties illustrate the challenges of lengthy review processes. For example, Thurston County has not updated its SMP since 1990 and has been working on its current review since 2009 (according to their website) and most recently submitted their proposed SMP to Ecology in late 2023. This update has yet to be finalized by both Ecology and the county almost 3 years later. And while it is scheduled to be complete in 2026, it is unclear if that timeline will remain. These examples warrant attention to both county capacity and Ecology's review timelines.

When reviews are delayed, shoreline users and businesses can face prolonged uncertainty about the rules that will apply to their projects. Additional requirements for local engagement, permit review, and no net loss analysis could increase these pressures and discourage investment before SMP updates are complete.

We encourage Ecology to establish clear, realistic timelines and progress-reporting expectations for both counties and the agency, together with technical assistance and resources to help local governments complete their reviews. Financial incentives for timely completion could also help improve accountability without adding unnecessary burdens to already stretched local governments.

No Net Loss: Clearer Guidance and Ecological Benefits

Further guidance is also needed on no net loss (NNL) requirements for SMPs. Although we understand the underlying standard is not changing, the proposed approach appears to increase complexities and expectations for counties to evaluate cumulative impacts and permitting outcomes. This could create additional work and costs for local governments and applicants, particularly where specialized analysis is needed.

Regardless of the complexities involved with the NNL analysis, we recommend that Ecology's NNL guidance acknowledge that projects may provide ecological benefits as well as potential adverse impacts, and these benefits should be considered in the NNL analysis. Shellfish and seaweed aquaculture, for example, can support ecosystem benefits like water quality and habitat. A few practical, science-based examples—potentially addressing different cultivation methods—would help planners understand how documented benefits and impacts should be considered in a site-specific NNL assessment. For example, farmed shellfish such as oysters, clams, and mussels naturally filter water, removing suspended particles and taking up nutrients as they grow. Ecology could use this well-documented ecological function to illustrate how potential water-quality benefits should be considered alongside other project impacts in a NNL assessment.

This would provide useful direction to county staff who may not have aquaculture expertise, while helping applicants understand how to describe the potential benefits and impacts of their projects. Clearer guidance could also reduce inconsistent permit conditions across jurisdictions without limiting appropriate site-specific review. More efficient and affordable permitting is especially important if aquaculture's preferred-use status is to have practical meaning.

We appreciate Ecology's work to protect Washington's shorelines and encourage an approach that pairs strong environmental standards with practical guidance, consistent implementation, and predictable processes for communities and shoreline users.

Sincerely,



Brett Veerhusen
Principal, Ocean Strategies