Greg Ferguson

Re: Minimum Requirements

Please consider the following suggestions.

Remove or edit WAC 173-26-246(9)(c)) "Minimum requirements for master program regulations."

Local jurisdiction adoption of this minimum requirement will not provide protection against sea level rise.
The requirement is far too low and does not protect against all flood hazards, like waves and local stormwater and stream flooding.

Following are assumptions used as an example for the mid Puget Sound region (Seattle NOAA gage data):
• 2100 planning horizon with sea level rise = 2'
• Ordinary High Water Mark elevation ≈ Mean Higher High Water = 9' (NAVD88 vertical datum)
• Twice per year stillwater elevation (approx. king tide) = 11'
• Current 100 year flood elevation = 13'

In this example, adoption of this rule standard would allow new and repair of buildings to occur at 11' (MHHW + SLR). These buildings would flood yearly now, could face 2' of water, and would flood daily by 2100. These buildings would also be under threat from local storm flows and from wave action. This standard is far too low.

There are two possible solutions:
1. Remove WAC 173-26-246(9)(c). This allows 173-26-246(9)(b) to set the minimum requirement, which does protect against sea level rise.

2. Adopt the following as the minimum requirement: "the current 100 year flood elevation plus sea level rise under the long-term scenario".

Sincerely,
Greg Ferguson
Sierra Club member