



## Comments for Ecology- Skagit County Shoreline Master Plan

May 18 2023

We appreciate the opportunity to comment on the revision and update of Skagit County's Shoreline Master Program (SMP). We appreciate the work that has gone into the submitted updated Skagit County SMP.

We are commenting on several sections we believe are important to fix:

- There is an almost complete omission of Sea Level Rise and Climate Change in the SMP. It is almost unfathomable that Skagit County would not want to take the time now, to ready itself and its residents to start planning for this.
- The SMP would allow timber cutting and temporary access logging roads within the shoreline zone and not make them subject to review. This is against state law.
- The SMP would allow a reduction in a shoreline buffer with only an Administrative Variance (no hearing). Any proposed reduction in shoreline buffers greater than 25% (the current requirement) should require a hearing review.
- Boulders would be considered "soft armor". This is inconsistent with Best Available Science and will confuse landowners.

### Sea Level Rise (SLR).

Skagit County sits squarely in an area affected by climate-driven impacts. Skagit County cannot afford to NOT plan for Sea Level Rise and climate change impacts. A 2022 EPA-funded study by Coastal Geologic Services and Washington Sea Grant indicates that Skagit County is, by far, the location most vulnerable to climate-driven impacts, such as sea level rise and coastal erosion, in all of Puget Sound.

And it has started. On lands Skagit Land Trust conserves we are seeing dikes that have stood for 100 years overtopping, buffers between shorelines and development being eroded by storm surges, and debris on our shorelines from structures falling off eroded banks. Given the community, natural and biological resources that will continue to be impacted- and the vast sums of money it will take to later deal with short-sighted decisions- it is striking that there is a near

complete omission of attention to sea level rise in Skagit's updated Shoreline Master Program (SMP).

It would not only be wise- but cost-effective- to include consideration of climate change impacts and sea-level rise in public and private infrastructure projects. Since this SMP is the shoreline guidance for the people of Skagit County for the next eight years or more, it is inevitable that if these are not taken into account, there will be many development projects approved that later are flooded or are subject to extreme erosion. It is inevitable there will be damage to the environment because there was inadequate guidance in this plan.

### **These Impacts Include:**

- Increased use of hard armoring to protect development and infrastructure on failing or flooding shoreline. Hard armoring is not fish and wildlife friendly and depletes essential sands and gravels needed to replenish our beaches and tidelands which protect our shorelines and are critical wildlife habitat.
- More septic systems, asphalt, concrete, and trash in areas that are prone to flooding and SLR.
- More development on bluffs and banks that are prone to erosion. This ultimately can lead to water and shoreline pollution when they fail.

These and numerous other impacts can be greatly reduced or avoided by including planning for climate change and sea-level rise in Skagit's Shoreline Master Program now.

### **Recommendations:**

#### **Sea-Level Rise and Climate Change Impacts**

- 1) Skagit County should modify their SMP to address SLR and climate change impacts now. This will help avoid the need for emergency revision before the next required eight-year review. SLR and other aspects of climate change are certainties. There will always be more data, but there is more than enough science to form good policies today.
- 2) Factual education on best available science regarding sea level rise, storm surges, etc. should be a mandatory part of Skagit County's permitting procedures in areas that will be impacted by SLR and climate change.

#### **Timber cutting and temporary access logging roads within the shoreline zone.**

Skagit County wants to make temporary logging roads exempt from the SMP. This is contrary to requirements in the WAC. The Skagit County Planning Services Public Comment Matrix summary and response June 9,2022 at 5(b) include a staff acknowledgement that under the WAC such roads are "development" subject to SMP regulation. We request:

“Temporary” logging access roads should not be exempt from review under the SMP and regulation.

**The SMP proposes to increase the percent reduction allowed in a shoreline buffer with only an Administrative Variance (not a hearing) from 25% to 50%.**

Shoreline buffers are critical for the protection of water quality, our struggling shoreline habitats, and fisheries resources. Buffers lessen the impact of storm surges and flooding. With increased erosion caused by climate change, buffers give our built human environment a safer margin for the unknown future. Doubling the percentage by which buffers can be reduced with a simple administrative process and no hearing will only encourage such reductions and increase impacts on shoreline buffers. We request:

Any proposed reduction in shoreline buffers greater than 25% (the current requirement) should require a hearing review.

### **Delete Boulders From Natural System Armoring Guidelines**

Boulders are hard armoring or part of hybrid shoreline stabilization. Boulders of any quantity are not part of soft-shoreline armoring. Soft armoring involves the creation or restoration of a natural shoreline system using nature-based shoreline management techniques. Since there are no parameters in the Skagit SMP guidelines for use of boulders in soft-shore armoring, listing them as “soft armoring” is misleading. It gives far too much leeway for their use and far too little guidance to a landowner or permit reviewer. For example, the current language below could be a description of hard-shoreline armoring. We request that boulders be deleted from soft-shore armoring lists. Boulders should be listed under hard armoring or hybrid armoring parameters.

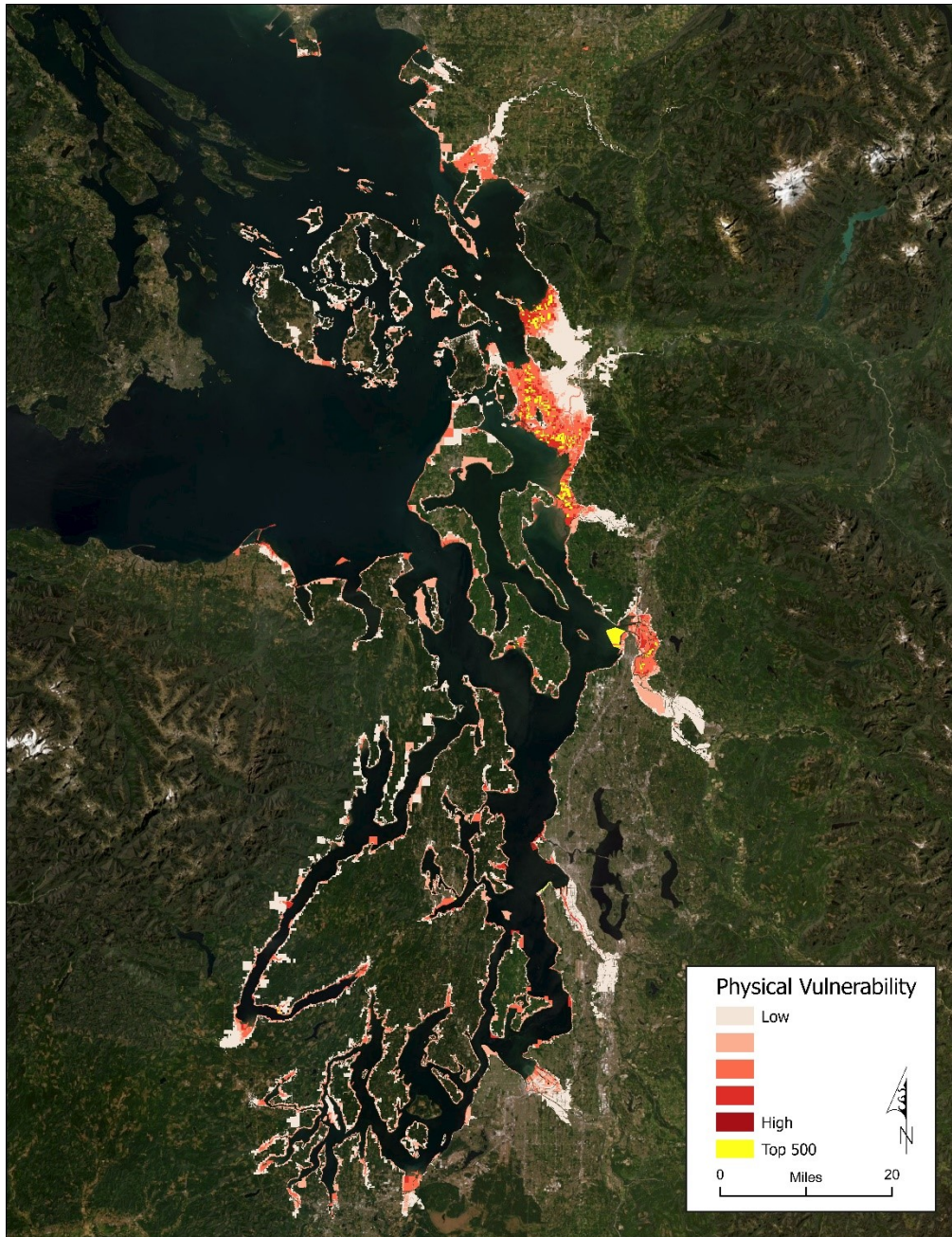
*The soft shoreline stabilization design must size and arrange **any gravels, cobbles, or logs, ~~and boulders~~** so that the project remains stable during a two- year flood event on rivers and under typical boat- and wind-driven wave conditions on lakes and marine waters, including storm and tidal events, and dissipates wave and current energy, without presenting extended linear faces to oncoming waves or currents.*

Thank you for the opportunity to comment.



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Prioritizing Sea Level Rise Exposure and Habitat Sensitivity Across Puget Sound. Final Technical Report. Prepared for the Puget Sound National Estuary Program. Prepared by Coastal Geologic Services, Inc., April 2022 Coastal Geologic Services and Washington Sea Grant