



By Email

March 31, 2022

Skagit County Board of County Commissioners
1800 Continental Place
Mount Vernon, WA 98273
pdscomments@co.skagit.wa.us

Re: Incorporating Sea Level Rise into Skagit County’s Comprehensive SMP Update

Dear Commissioners Browning, Janicki and Wesen:

Thank you for extending the comment period and for taking the time to carefully consider these comments on the comprehensive update to Skagit County’s Shoreline Management Program (SMP). With this letter, the undersigned local conservation organizations, representing thousands of Skagit Valley residents, emphasize that:

- Skagit County has an urgent need to address the existing and impending risks that climate change, and particularly sea level rise, pose to our community’s infrastructure, safety, and the environment;
- the County should join other jurisdictions that are already taking these steps—deferring this needed planning until the next update will only exacerbate the challenge;
- well-settled scientific information can be used to guide the County’s planning;
- the Shoreline Management Act requires SMPs to address flooding issues and to use the most current scientific and technical information in doing so; and
- we have proposed a sampling of redlined text from the SMP update that would incorporate sea level rise considerations into development decisions.

This letter addresses each of the points above. The proposed revisions to the SMP language begin at page 7. You will also find a summary of each of the signatories to this letter in the Appendix.

A. It Is Imperative to Address Sea Level Rise Today.

Now is the time for Skagit County to begin addressing the adverse effects of climate change — particularly Sea Level Rise (SLR). The County is highly vulnerable to the effects of rising sea levels. If left unmanaged, future flooding and coastal erosion will pose considerable risks to life, safety, jobs, critical infrastructure, coastal ecosystems, homes and businesses, agriculture, the County’s natural and recreational assets, and the economy. Some of Skagit’s coastal roads are already failing due to erosion or flooding regularly and will not hold up under SLR, particularly with more frequent storm events. Without planning, low elevation and marine areas of the County - which the vast majority of Skagitonians transit through daily, live in or make their livelihood in - will increasingly be cut off or damaged as the impacts of climate change and SLR are felt. Not only are these low lying areas, including extensive farmland, at risk, but emergency responses are expensive and are often extremely damaging to the environment. Crisis often means a temporary solution, rather than encouraging innovation and the best use of resources. We cannot afford to lose our coastal ecosystems, infrastructure, or farmland or place people in harm’s way. Skagit County needs to plan and to act now.

Across the globe, the case for planned approaches to climate change adaptation is clear. Sea level rise is one of the primary and most devastating impacts from climate change, and it, along with river and coastal flooding, is of particular importance in Skagit County. Skagit Climate Science Consortium notes:

Increases in coastal flooding and erosion are the result of more frequent extreme high tides, higher storm surge, and the greater chance of a high tide coinciding with a flooding river. Sea level and storm surge can cause floodwaters to “back up” into the lower Skagit River potentially increasing river flooding. Already seawater backs up from the bay to about Mt. Vernon during high tides. Rising sea levels can cause storm waves to become larger and more likely to overtop dikes and erode coastal bluffs and bulkheads.¹

As the Department of Ecology writes, “[s]ea level rise and storm surge[s] will increase the frequency and severity of flooding, erosion, and seawater intrusion—thus increasing risks to vulnerable communities, infrastructure, and coastal ecosystems.”² Not only will our marine shorelines be impacted, but as Ecology continues “[m]ore frequent extreme storms are likely to cause river and coastal flooding, leading to increased injuries and loss of life.” The 2022 NOAA

¹ Skagit Climate Science Consortium, Sea Level Rise, Brief Overview. Education Resources, www.skagitclimatescience.org

² Washington Department of Ecology, *Preparing for a Changing Climate; Washington State’s Integrated Climate Response Strategy*, Publication No 12-01-004, 90 (April 2012), available at <https://fortress.wa.gov/ecy/publications/publications/1201004.pdf>.

Sea Level Rise Technical Report³ warns that “SLR will create a profound shift in coastal flooding over the next 30 years by causing tide and storm surge heights to increase and reach further inland.” “Moderate floods will be 10 times as common as they are today. Major flooding will happen five times as often.”

We also note the broad community support for addressing sea level rise because it will flood homes, farms, businesses, and wildlands equally. It will not discriminate. All in its path will be harmed. So this Commission owes it to the entire County to properly plan for SLR in the SMP.

We value the Skagit and all that it has to offer, which is why Skagit County needs a program along with policies and regulations to help prepare for the challenge of sea level rise and flooding. We want county planning focused on building stronger and better prepared communities and resources, encouraging and protecting resilient coastal ecosystems, and ensuring a healthy future for generations to come.

While we appreciate the good work of Skagit County and the Watershed Company in making significant improvements from the current code, we wish to draw your attention to the glaring gap remaining – the urgent need to address sea level rise as a result of a changing climate in the Shoreline Management Plan.

B. Climate Change and Sea Level Rise Are Well-Settled Scientific Principles and Their Effects Can Be Projected with Reliable Certainty.

The science on climate change and sea level rise for our region is not new. In 1991, Ecology stated that “[a]ccelerated sea level rise is an acknowledged secondary effect of the greenhouse effect. Only the rate of acceleration is debated.”⁴ At that time, the US Environmental Protection Agency projected sea level rise through 2100 ranging between 1.8 and 11.3 feet.⁵ More recently, a 2022 report by the National Oceanic and Atmospheric Administration, titled “Global and Regional Sea Level Rise Scenarios for the United States,” refined projected rates of sea level rise and found that flooding events would increase significantly by 2050.⁶ The report projects several scenarios for sea level rise in the northwestern US, with the intermediate scenario resulting in 0.6 feet of sea level rise by 2050 and 2.6 feet of sea level rise by 2100.⁷

³ NOAA, NASA, US EPA, USGS, FEMA, US Army Corps, US Dept of Defense, *et al.*, *Global Sea Level Rise Scenarios for the United States: Updated Mean Projections and Extreme Water Level Probabilities Along U.S. Coastlines*, NOAA Technical Report NOS 01 (2022), available at: <https://oceanservice.noaa.gov/hazards/sealevelrise/noaa-nostechrpt01-global-regional-SLR-scenarios-US.pdf> (hereafter “NOAA Report”) (attached hereto).

⁴ Washington State Department of Ecology, *Sea Level Rise in Washington State: State-of-the-knowledge, Impacts, and Potential Policy Issues*, Pub. No. 93-537 Version 2.1, 4 (Dec. 199), available at: <https://apps.ecology.wa.gov/publications/documents/93537.pdf>.

⁵ *Id.*

⁶ NOAA Report.

⁷ *Id.* at 23.

Minor/disruptive flooding events are projected to increase in frequency in the northwest from about 4 events/year in 2020 to more than 10 events/year by 2050.⁸ Additional scientific information about the anticipated effects of climate change on Washington’s coasts, as well as considerations like clean water, endangered species, and human health, can be found at the University of Washington’s Climate Impacts Group website⁹ and Ecology’s Climate Change web pages.¹⁰

A 2011 reported titled Skagit River Basin Climate Science Report described the local shoreline impacts from climate change, stating that:

Increased flood risks from the combination of sea level rise and projected increases in river flooding has the potential to cause major damage to low-lying farms and urban development in the floodplain, impacting homes, businesses, water treatment plants, and transportation infrastructure such as bridges and roads. ...Sea level rise may also impact the ability to drain low-lying farmland using traditional tide gates. Warmer water temperatures, more severe and prolonged low summer flows, and potential habitat loss associated with projected sea level rise are projected to negatively impact coldwater fish species such as salmon, steelhead, and trout.¹¹

Thus, the science shows that it’s time to act. As the NOAA report states, “[s]ea level rise driven by global climate changes is a clear and present risk to the United States today and for the coming decades and centuries.”¹²

C. Additional Delays Will Lead to Greater Costs Down the Road—Skagit County Should Complete the Work it Started in 2011 to Address Climate Change and Sea Level Rise.

Although it may seem urgent to finalize the SMP since it has taken so long to get to this stage, it will be far more burdensome to the community, the environment, natural resource lands and the County to delay planning for SLR until the next update in 2028. The economic impact of allowing homes or infrastructure to be built in areas that will experience SLR impacts in upcoming years is enormous. Skagit County is well known for its agriculture, with approximately 1000 farms covering 97,700 acres.¹³ The dollar value of these crops exceeded \$314,447,000 in 2020.¹⁴ Without a plan, Skagit agriculture is increasingly at risk. The answer is not as simple as

⁸ *Id.* at 41.

⁹ <https://cig.uw.edu/>.

¹⁰ <https://ecology.wa.gov/Air-Climate/Climate-change>.

¹¹ Se-Yeun Lee & Alan F. Hamlet, *Skagit River Basin Climate Science Report*, 15 (Sept. 2011), available at: <https://www.skagitcounty.net/EnvisionSkagit/Documents/ClimateChange/Complete.pdf>.

¹² NOAA Report, at 1.

¹³ USDA 2017 Census of Agriculture, County Profiles.

¹⁴ Draft Skagit County WSU Extension 2020 Skagit County Agricultural Statistics.

building higher levees and more sea walls. The effective use of these structures will have a place in a plan, but these structures often accelerate erosion of adjacent, unprotected coastal areas, and damage coastal habitats by starving them of sediments and natural shorelines. Thus, risk reduction measures must be part of any plan. Additionally, natural shorelines should be used as a defense. Natural shorelines not only host numerous ecological environments for fish and wildlife, and are beloved for recreation locally, but also can provide long term, cost-effective buffers to our coastal communities, livelihoods, and infrastructure. In the challenging, uncertain world of climate change and Sea Level Rise, planning is the first thing to do.

Further, Skagit County has been working on the issue since 2011, when the Skagit County SMP Stakeholders task group identified climate change and sea level rise as critical issues that needed to be addressed and proposed several recommendations. In her April 15, 2016 staff report on the SMP Update, Betsy Stevenson similarly recommended that the update incorporate sea level rise into planning for residential development, shoreline erosion rates, and newly subdivided lots.¹⁵

Some local governments are already following Ecology's direction to address flood hazards and to reduce damage caused by floods by addressing sea level rise in their SMPs. Ecology's *Shoreline Master Program Handbook Appendix A: Addressing Sea Level Rise in Shoreline Master Programs* presents background information on projected sea level rise in Washington State and impacts and offers guidance for addressing sea level rise in SMP updates. In addition, Ecology has partnered with Washington Sea Grant to develop the Puget Sound Coastal Resilience Project that incorporates data on future sea level, high tides, and storm surges to map projected inundation in the Nooksack, Skagit, Stillaguamish, Snohomish, Nisqually, and Skokomish River deltas. Thus, information exists to support planning for SLR, and jurisdictions from the Swinomish Indian Tribal Community to the City of Anacortes are formally assessing and addressing the risks of SLR.

D. Shoreline Management Act Mandates to Use Science and Address Flooding Require the County to Address Climate Change and Sea Level Rise.

While the Shoreline Management Act ("SMA") and Shoreline Master Program Guidelines ("Guidelines") do not expressly use the term "sea level rise," it is not possible in 2022 to satisfy the SMA's requirements to use current science and address flooding without acknowledging and addressing sea level rise. The SMA instructs shoreline master programs to include "[a]n

¹⁵ Supplemental Staff Report #1, from Betsy Stevenson to Planning Commission, regarding Shoreline Master Program Update – Comprehensive Plan Policies, Development Regulations and Shoreline Environment Designation Maps, 4-5 (April 15, 2016), *available at*: <https://www.skagitcounty.net/PlanningAndPermit/Documents/SMP/Supplemental%20Staff%20Report%204-15-2016.pdf>.

element that gives consideration to the statewide interest in the prevention and minimization of flood damages....”¹⁶ The Guidelines note that the most effective means for reducing flood hazards is to prevent or remove development in flood-prone areas.¹⁷ And in updating SMPs, the Guidelines declare that “[e]ffective shoreline management requires the evaluation of changing conditions and the modification of policies and regulations to address identified trends and new information.”¹⁸ Sea level rise certainly qualifies as an identified trend, and while scientific evidence of its existence along our shorelines could no longer be characterized in 2022 as “new,” recent scientific studies have refined projections with increased specificity.

In addition, the SMA and Guidelines direct the County to incorporate scientific information and thus require the use of readily-available sea level rise information. The SMA directs the County to “[c]onsider all plans, studies, surveys...being made by federal...agencies...dealing with pertinent shorelines of the state,” and, more specifically for sea level rise, to “[u]tilize all available information regarding hydrology, geography, topography, ecology, economics, and other pertinent data.”¹⁹ To implement the SMA directive to protect shoreline natural resources and the ecological functions necessary to sustain those natural resources, counties must use scientific and technical information.²⁰ First, counties must “identify and assemble the most current, accurate, and complete scientific and technical information available that is applicable to the issues of concern.”²¹ Second, once a county has amassed this information, it must “base master program provisions on an analysis incorporating” this information.²² Nowhere do the Guidelines suggest that a county can ignore current and accurate scientific information, much less ignore it without justification. Consequently, just as the SMP acknowledges the reality of physical processes like tides and feeder bluffs, it must acknowledge the scientifically-undisputed rising sea levels that are threatening its shorelines.

Even if the Guidelines did not require the SMP Update to incorporate common sense measures to protect your community from unnecessary damage and danger due to sea level rise, residents reasonably expect this from you. Like most challenges that elected representatives face, sea level rise won’t disappear by ignoring it. Instead, the risks and the expense of responding to them will merely increase as historic development patterns and practices continue. Our community cannot twiddle our thumbs any longer on the issue of sea level rise. The longer we procrastinate, the costlier it will become to undo the damages to our infrastructure, our agricultural sector, our properties, and our communities from sea level rise.

¹⁶ RCW 90.58.100(2)(h).

¹⁷ WAC 173-26-221(3)(b).

¹⁸ WAC 173-26-201(2)(b).

¹⁹ RCW 90.58.100(1)(c), (e).

²⁰ WAC 173-26-201(2)(c), (2)(a).

²¹ WAC 173-26-201(2)(a).

²² WAC 173-26-201(2)(a).

E. Several Revisions to the SMP Update Could Address Sea Level Rise.

Fortunately, a few simple revisions to the Update can start to address shoreline development in areas that are already being, and likely in the near future to be, affected by sea level rise.

Toward that end, we propose specific language below. Note that additions are marked with underline, and deletions marked with ~~strike through~~. Please also note that we propose planning and permitting decisions based on the anticipated life for the specified type of development based on the planning horizon concept contemplated by Ecology.²³

Policies:

Shoreline Uses and Modifications

- 6C-6.5: Essential public facilities should not be constructed in flood plains and areas of marine shorelines that are likely to be inundated by sea level rise during the anticipated life span of those facilities.
- 6C-15.3: Residential development should be located:
 - c. to avoid the need for hard shoreline stabilization and flood hazard management facilities during the anticipated life span of that development.
- 6C-15.12: New shoreline residential development should be designed, located, and constructed to ensure that it will not need to be relocated or reconstructed due to sea level rise during the anticipated life span of that development.
- 6C-16.1 ~~Limit use of hard structural stabilization measures to reduce shoreline damage.~~ Use of hard structural stabilization measures will be prohibited except where there is no reasonable alternative to protect a primary structure existing as of 2022.

Critical Areas

- 6G-2.3: Protect and manage shoreline-associated wetlands, including maintenance of sufficient volumes of surface and subsurface drainage into wetlands, as well as the landward migration of wetlands as a result of sea level rise, to sustain existing vegetation and wildlife habitat.
- 6G-2.8: Limit new development in floodplains and areas of marine shorelines likely to be inundated by sea level rise during the anticipated life span of that new development.
- 6G-2.9: Regulate development within the 100-year floodplain and areas of marine shorelines likely to be inundated by sea level rise to avoid adverse impacts to shoreline

²³ *Sea Level Rise in Washington State*, Pub. No. 93-537 Version 2.1, at 20 (acknowledging, however, that “[p]lanning and analysis horizons for land use decisions or commitments might as well be perpetual for all practical purposes. Once a site has been ‘committed’ to a use, that use becomes established by tradition or legal fact.”)

ecological functions and to avoid risk and damage to property and loss of life.

Flood Hazard Reduction policies:

- 6I-1.5: Skagit County shall monitor the impacts of climate change on shorelands, the shoreline master program's ability to adapt to sea level rise and other aspects of climate change at least every periodic update, and revise the shoreline master program as needed. Skagit County shall periodically assess the best available sea level rise projections and other science related to climate change within shoreline jurisdiction and incorporate them into future program updates, as relevant.
- 6I-1.6: Plans, regulations, and programs related to tidal flooding and storm surge will be coordinated and integrated with the Comprehensive Plan, marine flood hazard plans, National Flood Insurance, and regulations for critical areas and the SMP.
- 6I-1.7: Non-structural flooding and storm surge hazard reduction measures are preferred over structural measures. When evaluating alternative measures, the removal or relocation of structures in the tidal flood and storm surge-prone areas should be considered.
- 6I-1.8: Tidal flood and storm surge hazard protection measures will result in No Net Loss of ecological functions and ecosystem-wide processes associated with marine and estuarine shorelines.
- 6I-1.9: Marine and estuarine ecological systems should be returned to and maintained in the future in a more natural state where feasible including by removal of structures and hard armoring blocking the upward shoreline migration due to sea level rise.
- 6I-1.10: New lots and new expanded development should be located so they will not interfere with the landward expansion and movement of wetlands and aquatic vegetation as sea level rises.

Development Regulations:

- 14.26.305(1) No Net Loss of Ecological Functions. Uses and developments on Skagit County shorelines must be designed, located, sized, constructed, and maintained to achieve no net loss of shoreline ecological functions necessary to sustain shoreline natural resources, considering sea level rise estimates.
- **14.26.310-1 Dimensional Standards.** 10% Hard Surface Limits for all uses in Rural Conservancy.
- **14.26.320 General Provisions Applicable Upland of the OHWM**
 - (1)(a) New development must be located and designed to avoid the need for future shoreline stabilization to the maximum extent feasible during the life span

of the structure and based on sea level rise projections for that time period.

- (1)(b) Land divisions must be designed to ensure that future development of the created lots will not require shoreline stabilization for reasonable development to occur or cause foreseeable risk from geological or hydrological conditions, including any change in conditions projected by 2100 due to sea level rise.

- **14.26.350 Flood Hazard Reduction**

- (1)(c) Actions under this section must be designed to accommodate the amount of sea level rise estimated during the anticipated life span of proposed development.
- (2)(b) That the potential adverse impacts on ecological functions and priority species, including those associated with or exacerbated by sea level rise, can be successfully mitigated;

- **14.26.380 Vegetation Conservation**

- (2) Application requirements
 - (g) areas projected to be inundated by sea level rise during the anticipated life span of the proposed development.

- **14.26.460 Recreational Development**

- (4)(c) Recreational developments must be located, designed and operated in a manner consistent with the purpose of the environment designation in which they are located and so that no net loss of shoreline ecological functions or ecosystem-wide processes results, considering projected sea level rise.

- **14.26.470 Residential Development**

- (4)(a) Plats and subdivisions must be designed, configured and developed in a manner that ensures that no net loss of ecological functions results from the plat or subdivision at full build-out of all lots. New lots shall be designed and located so that the buildable area is outside the area likely to be inundated by sea level rise in 2100 and outside the area in which wetlands and aquatic vegetation likely will migrate during that time.
- (4)(b) Residential development must be located and designed to avoid the need for flood hazard reduction measures and for tidal flooding and storm surge protection measures, including shoreline stabilization, based on sea level rise projections during the anticipated life span of the development.
- (4)(g) Where lots are large enough, new structures shall be located so that they are outside of the area likely to be inundated by sea level rise during the

anticipated life span of those structures and outside of the area in which wetlands and aquatic vegetation will likely migrate during that time.

- (4)(h) New and substantially improved structures shall be elevated above the elevation likely to be gained by sea level rise during the anticipated life span of those structures.

- **14.26.475 Shoreline Habitat and Natural Systems Enhancement Projects**

- (3) Application Requirements:
 - (a)(i) Plan and cross-section views of the existing and proposed shoreline configuration, showing accurate existing and proposed topography and OHWMs as estimated for 2100 based on sea level rise projections.

- **14.26.480 Structural Shoreline Stabilization**

- (2)(a) New hard shoreline stabilization structures are prohibited, except when analysis confirms that there is a significant possibility that a primary structure built before 2022 will be damaged within three years as a result of shoreline erosion in the absence of such hard shoreline stabilization structures, or where waiting until the need is immediate results in the loss of opportunity to use measures that would avoid impacts on ecological functions.
- (2)(c)(i) To protect ~~an existing~~ primary structure built before 2022, including a residence, when conclusive evidence, documented by a geotechnical analysis, is provided that the structure is in danger from shoreline erosion caused by currents or waves....
- (3)(a)(ii)(A) Plan and cross-section views of the existing and proposed shoreline configuration, showing accurate existing and proposed topography and OHWMs as estimated based on sea level rise provisions over the anticipated life span of the development.
- (3)(b)(iv) An assessment that concludes the replacement structure is designed, located, sized, and constructed to assure no net loss of ecological functions consistent with mitigation sequencing requirements in SCC 14.26.305 and incorporating sea level rise projections for the anticipated life span of the structure.

- **14.26.485 Transportation Facilities**

- (3) Application requirements
 - (a)(iii) potential for enlargement of inundated areas, including the potential and the area projected to be inundated by sea level rise over

the anticipated life span of the facility.

- (4) Development Standards.
 - (a) Transportation facilities must be planned, located, and designed to achieve all of the following at current tidal levels and at tidal levels projected over the anticipated life span of the facilities due to sea level rise:
 - (i) Bridge abutments and necessary approach fills must be located, if feasible, landward of associated wetlands or OHWM for water bodies without associated wetlands, as they are projected to migrate during the anticipated life span of those abutments due to sea level rise, provided mid-river bridge piers are permitted.
 - (j) Roads and railroads must not measurably increase flood levels or profiles and must not restrict or otherwise reduce floodplain and floodway capacities at current tidal levels and at tidal levels projected during the anticipated life span of that development due to sea level rise
- **14.26.490 Utilities**
 - (4) Development Standards
 - (a)(ii) Locate and design the project to avoid the need for new structural shoreline stabilization or flood hazard reduction facilities over the anticipated life span of the utilities based on projected sea level rise.
 - (c)(i) Underwater utility lines must enter and emerge inland from fresh and salt water banks, dikes, beaches, or shorelands in their projected location as it migrates over the anticipated life span of the utility lines due to sea level rise.
 - (d)(ii) Permitted water crossings requiring structural abutments or approach fills must set back such facilities landward of the OHWM in the location projected for those water crossings due to sea level rise projections at the end of the anticipated life span of those crossings.
- **14.26.515 Standard Critical Areas Review and Site Assessment Procedures**
 - (4)(c) The site assessment shall include:
 - (x) the projected location of the critical area over the anticipated life span of the new development based on sea level rise projections.
- **14.26.534 Wetland Performance-based Buffer Alternatives and Mitigation Standards**

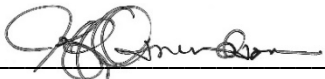
- (2) Buffer Width Averaging.
 - (e) Averaging is prohibited for wetland buffers unless the applicant demonstrates that the buffer will not be adversely affected by projected sea level rise over the anticipated life span of the development.
- **14.26.540 Aquifer recharge areas intent**
 - (1)(d) limit adverse impacts to drinking water from saltwater intrusion to the maximum extent possible as sea level rises.
- **14.26.542 Aquifer recharge areas prohibited activities**
 - (7) Drilling new wells within 100 feet of an existing well that has experienced saltwater intrusion to the extent that chloride levels exceed Washington State maximum contaminant levels.
- **14.26.562 Geologically hazardous areas site assessment requirements**
 - (2)(h) A description of the likely effect that sea level rise projected over the anticipated life span of the development will have on the geologically hazardous area.
- **14.26.563 Geologically hazardous area mitigation standards.**
 - (2)(b) A site assessment is submitted and certifies that:
 - (ii) A quantitative slope stability analysis indicates no significant risk to the development proposal and adjacent properties; or the geologically hazardous area can be modified; or the development proposal can be designed so that the hazard is eliminated, all taking into consideration the sea level rise projected over the anticipated life span of the development.
- **14.26.572 Fish and wildlife habitat conservation area site assessment requirements.**
 - (4) A description of the likely effect that sea level rise projected over the anticipated life span of the development will have on the fish and wildlife habitat conservation area.
- **14.26.574 Fish and wildlife habitat conservation area performance-based buffer alternatives and mitigation standards.**
 - (2) Buffer Width Averaging.
 - (f) Averaging is prohibited for buffers unless the applicant demonstrates that the buffer will not be adversely affected by projected sea level rise over the anticipated life span of the development.

Conclusion

Don't let Skagit County get left behind. The risk of not planning for sea level rise is far too great. With both high probability of sea level rise and the high-cost consequences, Skagit County must act now to reduce the risk to lives, to protect the economic vitality of the community and the region, and to preserve our rich ecological heritage.

Sincerely,

/s/ Marlene Finley
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Jeff Osmundson, President
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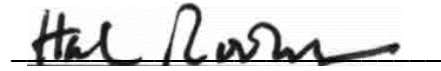

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cc: Joe Burcar, Department of Ecology

Attachment

APPENDIX

The organizations signing the letter above represent thousands of Skagit County residents who care about the natural and built environments. We value this area and all that it has to offer, and strongly encourage Skagit County to adopt SMP policies and regulations to help prepare our community for the challenge of sea level rise and flooding. We want county planning focused on building stronger and better prepared communities, encouraging and protecting resilient coastal ecosystems and ensuring a healthy future for generations to come.

Evergreen Islands dedicates itself to promoting, protecting, and defending Skagit County's unique saltwater island ecosystems, and to ensuring that Skagit County manage the expansion of its built environment to protect local ecological treasures.

Washington Environmental Council is a 501(c)(3) organization founded in 1967. Our mission is to protect, restore, and sustain Washington's environment for all, and we are committed to clean water protections for Puget Sound and for all Washington State waters.

RE Sources is a local organization in northwest Washington. Founded in 1982, RE Sources works to build sustainable communities and protect the health of northwest Washington's people and ecosystems through the application of science, education, advocacy, and action. RE Sources has over 20,000 supporters in Whatcom, Skagit, and San Juan counties.

Sierra Club, founded in 1892, is the largest and oldest grassroots conservation organization in the United States, with more than 3,000,000 members nationwide, and more than 100,000 members and supporters in Washington. The Mt. Baker Group (MBG) of Sierra Club's Washington State Chapter encompasses Whatcom, Skagit and San Juan Counties, collectively home to more than 10,000 members and supporters. More than 3,000 members and supporters reside in Skagit County, where MBG takes a keen interest in the efforts of elected officials to protect their constituents from the increasingly dangerous impacts of climate change.

Skagit Audubon Society is the National Audubon chapter focused on Skagit County. The society's 450 members share a mission of conserving and restoring natural ecosystems, focusing on birds, other wildlife, and their habitats for the benefit of humanity and the earth's biological diversity.

Skagit Land Trust conserves wildlife habitat, wetlands, agricultural and forest lands, scenic open space and shorelines for the benefit of the community and as a legacy for future generations of people and wildlife. The Trust works throughout Skagit County.

Guemes Island Planning Advisory Committee's mission is to sustain the island's rural character and natural environment.