

## Linda Ann Kuller

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**From:** Yunge, Chad (ECY) <CYUN461@ECY.WA.GOV>  
**Sent:** Wednesday, August 15, 2018 3:13 PM  
**To:** Linda Ann Kuller  
**Cc:** Burcar, Joe (ECY)  
**Subject:** WAC 173-26-231 Shoreline Modifications

Hi Linda,


The geotechnical reporting requirements for demonstrating the need for structural stabilization (soft and hard) are found within the shoreline modification provisions of the SMP guidelines in WAC 173-26-231(3)(a)(iii)(D) as follows:

Geotechnical reports pursuant to this section that address the need to prevent potential damage to a primary structure shall address the necessity for shoreline stabilization by estimating time frames and rates of erosion and report on the urgency associated with the specific situation. **As a general matter, hard armoring solutions should not be authorized except when a report confirms that there is a significant possibility that such a structure will be damaged within three years as a result of shoreline erosion in the absence of such hard armoring measures, or where waiting until the need is that immediate, would foreclose the opportunity to use measures that avoid impacts on ecological functions.** Thus, where the geotechnical report confirms a need to prevent potential damage to a primary structure, but the need is not as immediate as the three years, that report may still be used to justify more immediate authorization to protect against erosion using soft measures.

The three year requirement is only specifically referenced for hard shoreline stabilization measures. The next sentence in the same guideline provision above allows for the use of soft measures when stabilization is necessary but not within three years.

I trust this answers you question but let me know if you need any additional information on this.

Regards,  
Chad

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