



To: Anacortes Planning Department and Planning Commission

From: Smart Growth Anacortes (SGA)

Subject: Climate Change, Ecological Resilience, and Implementation Gaps in the Updated Gap Analysis and Consistency Review

Planning Commission Members and Planning Staff:

Smart Growth Anacortes believes, with excellent and independent factual cause, that the **Updated Gap Analysis and Consistency Review** provides a useful starting point for the Shoreline Master Program update. The document identifies several important changed circumstances and planning updates, including climate change, sea level rise, updated floodplain regulations, the 2025 Comprehensive Plan Climate Element, the Shoreline Master Program Compliance Assessment Report, and the ongoing Best Available Science review.

SGA commends the Planning Department for identifying these issues and for attempting to coordinate the SMP update with the Comprehensive Plan, Critical Areas Ordinance update, and state requirements. This is a positive step.

However, SGA believes the Updated Gap Analysis does not go far enough.

Our concern is not that climate change is completely absent from the document. Climate change and sea level rise are acknowledged. The concern is that they are acknowledged **without a sufficiently methodical analysis of how climate change and extreme environmental conditions will affect the ecological systems, shoreline infrastructure, and residents the SMP is intended to protect.**

The current analysis is strongest as a review of changes in statutes, regulations, and adopted planning documents. It is less complete as an analysis of changed environmental conditions and foreseeable risks.

SGA believes there is still time to do this right. The City has until **December 31, 2027** to update the SMP and there is no State required date for the Permit Streaming proposal. (see Turner and Munce versus City of Anacortes, Case No.: 26-2-0008).

Thus, this allows sufficient time for substantial analysis, major edits and additions to the document and to have the public engaged not only in making comments but in determining decisions.

The City is currently undertaking three related and important processes:

1. Updating the Shoreline Master Program
2. Reviewing the Shoreline Master Program through the FACET Compliance Assessment Report
3. Updating Critical Areas regulations using Best Available Science.

These processes should not operate independently. They should be integrated into one transparent and scientifically supported process.

The FACET Report identifies implementation weaknesses in the existing SMP. The Draft BAS Report identifies the scientific basis for protecting wetlands, fish and wildlife habitat, streams, and other critical areas. The Updated Gap Analysis should use both documents to determine whether the City's existing and proposed shoreline regulations are adequate for the environmental conditions Anacortes faces today and is likely to face in the future.

SGA therefore submits the following Executive Review, recommendations with annotations, summary, and conclusion.

Executive Review

The Updated Gap Analysis recognizes climate change but does not fully analyze climate change as a changed circumstance

The Updated Gap Analysis identifies climate change and sea level rise as important considerations. It recognizes the City's Climate Element, changes to floodplain regulations, and future state rulemaking regarding sea level rise and shoreline management.

This is an important start.

However, SGA believes the analysis is too narrowly framed.

Climate change should not be evaluated only as:

- sea level rise
- future coastal flooding
- future state rulemaking

Climate change in Anacortes is a system of interconnected risks and environmental changes. These include:

- sea level rise
- King Tides
- storm surge
- compound flooding
- atmospheric rivers - extreme precipitation

- urban flooding
- drought
- low stream flows
- increased water temperatures
- wildland fires
- post-fire erosion and runoff
- changes to wetland hydrology
- changes to lakes and streams
- degradation of riparian areas
- loss of tree canopy
- habitat fragmentation
- impacts to wildlife, plants, birds, fish, and other species.

These issues should be evaluated together because the impacts can compound one another.

A high King Tide occurring during an atmospheric river is not the same planning event as a normal high tide. A drought followed by an intense rainfall event is not the same as a typical stormwater event. A wildfire followed by heavy rainfall can create sediment, erosion, runoff, and habitat impacts not present under normal conditions.

The Updated Gap Analysis should therefore expand its climate review from a narrow “**Climate Change and Sea Level Rise**” category to a broader climate and ecological resilience analysis.

Waiting for future Ecology rulemaking should not prevent the City from addressing known local risks now

The Updated Gap Analysis indicates that Ecology's future rulemaking concerning sea level rise should guide future comprehensive SMP amendments.

SGA agrees that the City should coordinate with Ecology.

However, waiting for future state rulemaking should not prevent Anacortes from addressing environmental conditions and vulnerabilities that are already known.

The City has already recognized and experienced:

- sea level rise
- coastal flooding
- climate change
- flood hazards
- climate-related planning concerns.

The City's periodic review process should distinguish between:

Actions that can be taken now

These may include:

- improving permit documentation
- mapping environmental conditions
- requiring baseline ecological information
- improving vegetation protection
- improving wetland and stream protection
- improving monitoring
- clarifying no net loss requirements
- identifying site-specific climate vulnerabilities

Actions that may require future state guidance

These may include larger regulatory changes dependent upon new Ecology shoreline guidance or future statewide requirements.

SGA believes both tracks can occur at the same time.

The question should not be: **“Do we wait for Ecology?”**

The question should be: **“What can Anacortes improve now, based upon what we already know, while remaining prepared to make additional changes when Ecology completes its work?”**

The FACET Report demonstrates that existing implementation gaps must be addressed before concluding that the SMP is adequate

The FACET Compliance Assessment Report provides an important factual basis for the SMP update.

The report found that the existing permitting and implementation system does not consistently demonstrate compliance with the SMP's no net loss requirements. Among the concerns identified were:

- incomplete mitigation sequencing documentation;
- infrequent critical area reports;
- inadequate vegetation documentation;
- inconsistent landscape and mitigation plans;
- missing as-built documentation; and
- limited monitoring reports.

SGA previously stated that the FACET Report provides an excellent opportunity for a full process improvement assessment. The City has done something valuable by commissioning an independent review. The next step is to use the findings.

The Updated Gap Analysis should not simply state that FACET recommendations will be considered where applicable.

SGA recommends that each FACET recommendation be tracked through the SMP update process.

A transparent matrix should be created:

FACET Finding	Identified Problem	Proposed Recommendation	SMP or Code Section	City Action	Implementation Date
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This would provide traceability.

It would allow the Planning Commission and the public to determine:

- which FACET recommendations are being adopted
- which recommendations are being modified
- which recommendations are being rejected
- the reasons for each decision.

This is consistent with SGA's belief that transparent decision criteria and documented processes improve both public confidence and final outcomes.

The Draft BAS Report should be integrated into the climate analysis

The Draft Best Available Science Report provides a scientific framework for evaluating wetlands, fish and wildlife habitat conservation areas, streams, and other critical areas.

The BAS process recognizes that critical areas perform ecological functions and provide ecological values that depend upon:

- hydrology
- vegetation
- habitat connectivity
- buffer conditions
- sensitivity
- rarity
- location
- site-specific environmental conditions.

Climate change has the potential to alter each of these conditions

A wetland may experience changing hydrology.

A stream may experience lower summer flows and higher winter flows.

Riparian vegetation may experience drought stress.

Wildlife habitat may become fragmented or unsuitable.

Tree canopy may decline.

Plant communities may change.

Bird habitat may be altered by changing food, water, and nesting conditions.

SGA believes that the BAS Report and the SMP Gap Analysis should not be treated as separate documents moving through separate processes.

The City should develop a **BAS–CAO–SMP Consistency Matrix**:

BAS Finding or Recommendation	CAO Provision	Existing SMP Provision	Proposed Amendment	Remaining Gap
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This will allow the Planning Commission and public to see whether the science supporting critical area protection is actually being translated into shoreline regulations and permit decisions.

Recommendations With Annotations

Recommendation 1 — Expand the climate change review category

Identified Problem

The current climate discussion is largely focused on sea level rise and future coastal flooding.

SGA Recommendation

Replace the current climate review category with:

Climate Change, Sea Level Rise, Extreme Weather, Hydrologic Change, and Ecological Resilience

Annotation

This broader category should specifically evaluate:

- sea level rise
- King Tides
- storm surge
- compound flooding
- atmospheric rivers
- extreme precipitation
- urban flooding
- drought
- low-flow conditions
- wildfire
- post-fire erosion
- wetland hydrologic change
- stream and lake impacts
- riparian degradation
- tree canopy loss
- habitat fragmentation
- impacts to fish, wildlife, plants, and birds

Why this matters

Climate impacts should not be analyzed as isolated events. The City's environmental systems are connected.

SGA recommends a simple and transparent analysis matrix:

Climate Hazard	Resource Affected	Existing Protection	Identified Vulnerability	Recommended Action
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Recommendation 2 — Add King Tides and compound flooding to the changed-circumstances analysis

Identified Problem

The Updated Gap Analysis discusses coastal flooding but does not clearly identify King Tides and compound flooding as separate planning scenarios.

SGA Recommendation

The City should evaluate the combined impacts of:

- elevated tides
- sea level rise
- storm surge
- heavy rainfall
- saturated soils
- high stream flows
- urban drainage limitations

Annotation

The City should evaluate whether existing:

- setbacks
- flood standards
- vegetation requirements
- redevelopment standards
- shoreline stabilization standards
- critical area protections remain adequate under compound flood conditions.

A planning framework that evaluates one hazard at a time may underestimate actual risk.

Recommendation 3 — Add atmospheric rivers and urban flooding as specific review topics

Identified Problem

The Updated Gap Analysis addresses floodplain management but does not appear to fully analyze extreme precipitation and urban flooding as changed circumstances.

SGA Recommendation

Add a specific review category:

Extreme Precipitation, Atmospheric Rivers, Stormwater Capacity, and Urban Flooding

Annotation

Extreme rainfall can:

- overwhelm drainage systems
- increase runoff
- increase erosion
- transport sediment and pollutants

- damage stream banks
- alter wetland hydrology
- affect nearshore water quality

These are shoreline ecological issues as well as infrastructure issues.

The City should evaluate whether current development standards adequately protect:

- permeable surfaces
- native vegetation
- wetlands
- riparian areas
- tree canopy
- natural infiltration

Recommendation 4 — Add drought and low-flow conditions

Identified Problem

Drought and seasonal water stress are not adequately addressed in the climate review.

SGA Recommendation

The Updated Gap Analysis should evaluate the impacts of drought and low-flow conditions on:

- streams
- lakes
- wetlands
- groundwater
- riparian vegetation
- fish
- wildlife
- wildfire risk

Annotation

The City should ask whether the current regulatory framework protects ecological functions during both:

Too Much Water

and

Too Little Water

A climate-resilient shoreline program must be capable of addressing both conditions.

Recommendation 5 — Add wildfire and post-fire environmental impacts

Identified Problem

Wildland fire does not appear to be evaluated as a changed circumstance affecting shoreline and critical-area systems.

SGA Recommendation

Add:

Wildland Fire, Post-Fire Erosion, Watershed Impacts, and Ecological Recovery

as a climate and environmental review category.

Annotation

Wildfire can affect:

- vegetation
- soils
- slope stability
- erosion
- sediment transport
- streams
- wetlands
- habitat

The SMP and CAO should be evaluated to determine whether they provide adequate standards for:

- post-fire erosion control
- sediment protection
- restoration
- native and climate-resilient vegetation
- prevention of unnecessary conversion of environmentally damaged areas into permanent development.

Recommendation 6 — Require a climate-resilience review for wetlands

Identified Problem

Wetlands are generally evaluated based upon current mapping and existing conditions without sufficient consideration of changing hydrology and future climate conditions.

SGA Recommendation

Where climate risk is reasonably foreseeable, shoreline projects should evaluate the potential effects of:

- changing hydrology
- sea level rise
- increased inundation
- drought
- salinity
- sedimentation
- habitat connectivity

Annotation

The BAS Report emphasizes wetland functions and values.

SGA recommends that the City evaluate whether mitigation and restoration plans are designed only to replace present-day conditions or whether they will remain functional under foreseeable future conditions.

The goal should be:

No Net Loss of Ecological Function and Increased Ecological Resilience Where Restoration or Mitigation Occurs.

Recommendation 7 — Strengthen protection for streams, lakes, and riparian areas

Identified Problem

Climate change impacts to streams, lakes, and riparian systems are not clearly integrated into the Gap Analysis.

SGA Recommendation

Require shoreline projects to identify:

- existing streams and waterbodies
- riparian vegetation
- buffers
- canopy conditions
- ecological functions
- foreseeable climate vulnerabilities

Annotation

The City should consider a permit requirement for a **baseline ecological conditions analysis** for projects involving:

- new development
- substantial redevelopment
- vegetation clearing
- shoreline modification
- work within or near critical areas

This information is necessary for the City to determine whether ecological functions are being protected.

One cannot demonstrate improvement or no net loss without first knowing the baseline condition.

Recommendation 8 — Treat tree canopy and native vegetation as climate infrastructure

Identified Problem

The FACET Report identifies inconsistent implementation of vegetation conservation and revegetation requirements.

SGA Recommendation

The SMP should treat shoreline tree canopy and native vegetation as functional environmental infrastructure.

Require applicable shoreline applications to include:

- existing vegetation mapping
- canopy information where relevant
- proposed vegetation removal
- proposed native vegetation retention
- revegetation areas

- monitoring requirements

Annotation

Vegetation contributes to:

- stormwater infiltration
- erosion control
- shading
- habitat
- water temperature protection
- slope stability
- shoreline resilience

SGA recommends that the City establish a measurable baseline and evaluate projects against that baseline.

Recommendation 9 — Strengthen No Net Loss by adding ecological resilience

Identified Problem

The FACET Report demonstrates that mitigation sequencing and No Net Loss documentation are not consistently demonstrated.

SGA Recommendation

The SMP should clarify that No Net Loss analysis must evaluate:

1. Existing ecological functions
2. Proposed project impacts
3. Avoidance
4. Minimization
5. Remaining impacts
6. Compensatory mitigation
7. Long-term ecological resilience

Annotation

SGA recommends a standard City No Net Loss template.

The template should require a documented logic chain:

Existing Condition → Proposed Impact → Avoidance → Minimization → Residual Impact → Mitigation → Monitoring → No Net Loss Determination

This would provide consistency for:

- applicants
- City Staff
- consultants
- the Planning Commission
- the public

Recommendation 10 — Require vegetation and critical-area mapping

Identified Problem

The FACET Report identified deficiencies in the documentation of critical areas and existing vegetation.

SGA Recommendation

Require applicable shoreline permit site plans to identify and map:

- wetlands
- streams
- buffers
- fish and wildlife habitat
- shoreline vegetation
- tree canopy
- significant native vegetation
- proposed clearing

Annotation

This recommendation should be integrated into the permit application and SmartGOV workflow.

The City should use the permit system to automatically identify when additional environmental review is required.

This is an opportunity for process improvement.

Better information at the beginning of the process can reduce:

- uncertainty
- delays
- redesign
- public conflict
- potential litigation later in the process

Recommendation 11 — Integrate the FACET and BAS recommendations before finalizing the SMP update

Identified Problem

The Updated Gap Analysis recognizes the FACET and BAS processes but does not clearly demonstrate how each recommendation will be incorporated into the final SMP.

SGA Recommendation

Before final adoption, publish a consolidated implementation matrix:

Source Finding Recommendation SMP/CAO Section City Decision Reason

The sources should include:

- Updated Gap Analysis
- FACET Compliance Assessment
- Draft BAS Report
- Comprehensive Plan Climate Element
- public comments

Annotation

This would provide the traceability SGA has previously recommended.

The public should be able to see:

- the problem
- the evidence
- the recommendation
- the City's response
- the decision maker
- the final action.

Recommendation 12 — Establish a climate and ecological monitoring program

Identified Problem

The FACET Report identified weaknesses in monitoring, as-built documentation, and long-term tracking.

SGA Recommendation

Establish measurable indicators for shoreline ecological condition and climate resilience.

Potential indicators include:

- shoreline vegetation retained
- shoreline vegetation restored
- wetland buffer condition
- riparian canopy condition
- tree canopy changes
- impervious surface changes
- shoreline armoring
- wetland impacts
- stream impacts
- habitat impacts
- mitigation success
- monitoring compliance
- flood and climate-related permit conditions

Annotation

SGA recommends an annual or biennial:

Anacortes Shoreline Ecological Condition and Compliance Report

The report should be public-facing, understandable, and visually organized.

The residents of Anacortes—the owners and financiers of the City—should be able to determine whether the City's shoreline program is actually protecting the environmental resources it is required to protect.

Summary

SGA believes the Updated Gap Analysis is a useful starting point, but it is not yet a complete analysis of changed environmental conditions.

The document correctly identifies:

- climate change
- sea level rise

- floodplain updates
- the Comprehensive Plan Climate Element
- the FACET Compliance Assessment
- the ongoing BAS review.

However, the analysis should go further.

The primary gap is the difference between **recognizing climate change** and **evaluating the consequences of climate change for the actual environmental systems regulated by the SMP**.

Those systems include:

- wetlands
- lakes
- streams
- riparian areas
- shoreline vegetation
- tree canopy
- fish and wildlife habitat
- plants
- birds
- broader ecological connectivity.

The FACET Report provides evidence that the current implementation system has weaknesses.

The Draft BAS Report provides the scientific framework for protecting ecological functions.

The Updated Gap Analysis should bring these findings together.

SGA recommends a single integrated process using:

1. A Climate and Ecological Resilience Matrix
2. A FACET Recommendation Implementation Matrix
3. A BAS–CAO–SMP Consistency Matrix
4. A public-facing Shoreline Ecological Condition and Compliance Report.

This would create a transparent logic chain:

Documented Environmental Condition → Identified Risk or Gap → Scientific and Regulatory Basis → Recommendation → Code or Process Change → Monitoring → Public Reporting

This methodology would make the SMP update more transparent, measurable, actionable, and defensible.

Conclusion

SGA respectfully requests that the Planning Department and Planning Commission expand the Updated Gap Analysis before relying upon it as the basis for concluding that only limited amendments to the Shoreline Master Program are necessary.

The City has an opportunity to use this update to address not only changes in state law and adopted plans, but also the environmental conditions that Anacortes is experiencing and will increasingly experience.

SGA is not recommending delay for the sake of delay.

SGA is recommending that the City use the information it has already commissioned and collected to improve the quality of the SMP update.

The FACET Compliance Assessment identifies where implementation is not consistently achieving the intended results.

The Draft BAS Report provides scientific information regarding wetlands and fish and wildlife habitat conservation areas.

The Comprehensive Plan Climate Element identifies climate change as a significant planning issue.

The Updated Gap Analysis should integrate these findings into a single, traceable, transparent, and actionable framework.

There is time to do this right.

SGA requests that the Planning Commission direct Planning Staff to prepare a supplemental **Climate and Ecological Resilience Analysis** and associated consistency matrices before the Planning Commission makes its final recommendation on the SMP amendment package.

The purpose should be clear:

- identify what has changed
- identify what is at risk
- determine whether existing regulations remain adequate
- identify where implementation has failed
- incorporate Best Available Science
- strengthen shoreline ecological resilience
- improve transparency and public accountability
- provide measurable evidence that the City's Shoreline Master Program is protecting the environmental resources and community it is intended to serve.

SGA would welcome a respectful, informed, and positive conflicted dialogue with City Staff, the Planning Commission, other organizations, technical experts, and the public.

The objective should not be to create winners and losers.

The objective should be a better process and a better result.

A result in which:

- City Staff have clear decision criteria
- applicants understand requirements
- environmental protections are measurable
- ecological conditions are documented
- mitigation is monitored
- public participation is meaningful
- the residents of Anacortes—the owners and financiers of the City—have confidence that the future of their shoreline, environment, and community is being determined through a transparent, informed, and accountable process.

There is an opportunity here for a win-win for all.

Respectfully,

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<https://smartgrowthanacortes.com/>

Smart Growth Anacortes - Vision Statement

To have Anacortes as a premier example of a city in which assertive, knowledgeable and actively engaged residents—the owners and financiers of Anacortes—are working with City Staff, the Mayor, the City Council, and appointed boards and commissions in a transparent, respectful, collaborative environment for the benefit of all who live, work, and serve in Anacortes.