From:	Brice Boland
To:	ECY RE MSP Comments
Subject:	MSP Comments
Date:	Monday, September 23, 2013 3:27:16 PM

Below are my comment for the MSP plan:

As an active, aware and concerned coastal user, I would like to express my thoughts regarding Washington's current Marine Spatial Planning Process. Therefore, I suggest the following:

Include the overarching goal of "Protect and preserve existing sustainable uses" to the current drafted goals and objectives

--[if !supportLists]-->o <!--[endif]-->Prioritize and value the protection of and access to recreational areas for both coastal communities who benefit economically as well as the general public whose lives are enhanced by outdoor experiences

--[if !supportLists]-->o <!--[endif]-->Further emphasize the need to protect the marine ecosystem and its subsequent habitats, biodiversity, and ecological functions

--[if !supportLists]-->o <!--[endif]-->Conduct a study that collects spatial and economic data on non-consumptive recreational uses of the coast

Brice Boland

815 S Adams St

Tacoma, WA 98405

Delivered 9-23-13

Re: Public Comments for Washington Pacific Coast Marine Spatial Planning Goals and Priorities Scoping Document.

Hello,

I am writing to submit comments in regard to Goals and Priorities for the Washington Pacific Coast Marine Spatial Planning Activities Scoping Document. I have participated in marine policy development for many years. I have been directly engaged in Coastal Marine Spatial Planning (CMSP) since the initial discussions around the first enabling legislation was passed several years ago. I am a member of the Pacific County Marine Resources Committee and was also appointed to the Washington Coast Marine Advisory Council (WCMAC). I have applied and expect to be appointed to the reformed WCMAC under the Governor's office. As a shellfish grower in Willapa Bay, I am also a significant marine land owner who has a direct property interest associated with any CMSP zoning effort. I was asked by the Willapa-Grays Harbor Oyster Growers Association and the Pacific Coast Shellfish Growers Association to represent shellfish growers on the WCMAC in regard to CMSP issues. These two Associations represent approximately 95% of all shellfish cultivation in Washington state, and also represent large marine property holdings that may be directly affected by CMSP activities.

I would like the CMSP Scoping document to be amended in the following ways:

 # I request that the specific Language "Protect and Preserve Existing Sustainable Uses" be added as a top priority and goal in Washington MSP law and guidance and that the scoping document be amended to reflect that change.

As a participant in the workshops in Aberdeen that are referenced in the priorities document, I contributed significantly to the development of the draft scoping document. I, and many others, asked multiple times during these session that "protecting and preserving existing sustainable uses" be a key priority for CMSP. It is stated in the document that this request was made after the workshops were concluded, but that is simply not accurate. In addition to the workshops, there have been numerous public meetings and information sessions held over the past several years where input was sought by WDOE in regard to CMSP goals and priorities. In 2012 there were 4 workshops conducted by the Coastal MRCs where the public clearly stated that "Protecting and Preserving Existing Sustainable Uses" was a high priority, see attached summary document from those sessions. The WCMAC members, representing a vast range of coastal stakeholder groups, voted to adopt "Protect and Preserve Existing Sustainable Uses"

into not only its operating procedures as a priority, but also into its Mission Statement. From the initial legislative communications with those working to develop CMSP intent, it was committed by lawmakers that the MSP process would be a "bottom up" process where citizen input would drive MSP state policy. To gain support for CMSP, Legislators also committed to making one of the priorities for CMSP the "Protection and Preservation of Existing Sustainable Uses". This has been repeated numerous times by legislators during public comment at legislative hearings. In short the public input requesting that "Existing Uses be Protected and Preserved" has been loud and clear from a vast group of coastal stakeholders, and yet somehow we see a proposed document without this specific language. Recently passed SB-5603 includes a requirement that CMSP efforts be carried out in such a way as Existing Uses are Protected and Preserved, so we have law aligned with what the public has clearly identified as a priority for CMSP. While the current language in the scoping document contains some version of protect, and another version of existing, the scoping document must be amended to specify the specific wording "Protect and Preserve Existing Sustainable Uses" to assure there is clarity in the document.

 # I request that Washington CMSP Priorities and Goals include an offshore boundary out to 200 miles and that the scoping document be amended to reflect that change.

The scoping document states that the WCMAC also made suggestions in regard to the CMSP boundaries after the workshop meetings held in Aberdeen Spring 2013. Many WCMAC members proposed that the boundary for MSP be set at the 200 mile offshore limit during the workshop. This has also been proposed numerous times over the past several years in regard to Coastal Zone Management discussions as aligned with CMSP. This same input has been received at many of the public outreach sessions. In spite of this significant public input, the scoping document suggests limiting the ocean boundary much closer to shore. The reasoning for not supporting the 200 mile zone seems based on some relatively vague statements made by NOAA in regard to a requirement to justify the increased area of coverage for CMSP. Having listened to the NOAA representatives during the workshop, my understanding is that while there is a requirement to support a need to establish a particular use offshore, it is a relatively simple matter requiring existing data to document the use. The importance of setting the 200 mile limit varies County to County along the coastline. For instance Pacific County's economic base relies significantly on offshore fisheries, such as Albacore tuna that range from 25 to more than 800 miles off shore, while north coast counties don't rely on that use. Setting the limit at 200 miles results in providing an assured seat at the table for local governments when federal projects are proposed within 200 miles that may impact a demonstrated use. While Tuna are one use, there are many other fisheries that rely on species that move in and offshore depending on warm or other water conditions.

 # I request that Washington's CMSP priorities and goals are written so as to assure they are consistent with laws associated with private marine lands, and that the scoping document be reviewed and amended as necessary to assure no conflicts exists between property law and its content.

There are lands held by the private sector that are included within CMSP boundaries. For instance, the shellfish industry collectively owns significant portions of the coastal estuary marine lands, and their existing shellfish aquaculture uses and activities are permitted under variouse state and federal rules. CMSP guidelines must be written so as not to conflict with the marine lands owned by the shellfish industry, or by other private stakeholders. These stakeholders must be a part of any process where CMSP could act to degrade their ability to utilize their properties. They must be a formal party to any process where a new use is proposed that could impact their existing economic or other use on these private lands. This is a very different issue than a stakeholder group who has no ownership beyond their participation as the general public where the state would represent these interests.

Thank you for the opportunity to provide comment on this important issue.

Regards,

Brian Sheldon

From:	Guiltinan, Sara
To:	ECY RE MSP Comments
Cc:	Ellen Aronson; Barminski, Joan; Douglas Boren
Subject:	BOEM comments on scoping for the Pacific Coast Marine Spatial Plan and related environmental documents
Date:	Monday, September 23, 2013 1:18:06 PM

Hello,

Below please find comments from the Bureau of Ocean Energy Management Pacific OCS Region on scoping for the Pacific Coast Marine Spatial Plan and related environmental documents. Thank you for the opportunity to comment.

The Bureau of Ocean Energy Management (BOEM) supports Washington State's development of a framework for making informed, coordinated decisions and for bringing different interests together to balance the federal, state, local and tribal goals, including the protection of the environment. BOEM is actively engaged in marine spatial planning in the West Coast Region; these efforts will build on existing planning efforts such as this one upon which Washington State is embarking. BOEM is a federal regulatory agency for conventional and renewable energy and mineral resources on the Outer Continental Shelf (OCS) and, as such, has significant interest in the Washington Marine Spatial Plan as it pertains to potential renewable energy projects on the OCS offshore Washington. BOEM submits the following comments on the Public Comment Scoping Document for a Marine Spatial Plan on Washington's Pacific Coast:

1. **Geographic scope of the plan's study area**: Regarding the likely location of federal activity for offshore renewable energy development, BOEM recommends that the plan include a discussion of federal jurisdictions (i.e., BOEM has energy and mineral leasing authority 3-200 nautical miles from shore, FERC has licensing authority for marine hydrokinetic projects on navigable waters of the United States, and NOAA has permitting authority for activities within the Olympic Coast National Marine Sanctuary).
2. **Potential activities to address in the plan**: The Scoping Document includes requirements for the final plan to integrate existing management plans and authorities, make recommendations for aligning plans to the extent practicable, use and rely upon existing plans and processes, etc. BOEM has an established management framework and leasing process for the renewable energy development on the Washington OCS (3-200 nautical miles offshore) outside of the Olympic Coast National Marine Sanctuary. This framework/process includes coordination with federal, state, local and tribal governments through an intergovernmental renewable energy task force, if requested by the Governor. The framework/process also includes mechanisms for stakeholder and public input. BOEM recommends that the Washington Marine Spatial Plan align with the BOEM management framework, leasing process and task force model for the issue area of offshore renewable energy.
3. **Potential impacts and mitigation**: BOEM has a robust Environmental Studies Program that provides the science to inform policy decisions regarding development of OCS energy and mineral resources. Research covers physical

oceanography, atmospheric sciences, biology, protected species, social sciences and economics, submerged cultural resources and environmental fates and effects. A number of these studies focused on the West Coast could also inform the non-project EIS for the Washington Marine Spatial Plan, such as:

a) *Survey of Benthic Communities near Potential Renewable Energy Sites Offshore the Pacific Northwest;*

b) *Seabird and Marine Mammal Surveys off the Northern California, Oregon and Washington Coasts;*

c) *Inventory and Analysis of Coastal and Submerged Archaeological Site Occurrence on the Pacific OCS;* and

d) *Predicting the Consequences of Wave Energy Absorption from Marine Renewable Energy Facilities on Nearshore Ecosystems*.

BOEM recommends that Washington State utilize the information from BOEM studies for its Marine Spatial Plan.

Sara Guiltinan
Leasing Specialist
Bureau of Ocean Energy Management
Pacific OCS Region
805-389-7619
sara.guiltinan@boem.gov

From:	crabby@willapabay.org
To:	ECY RE MSP Comments; Austin, Jennifer (GOV)
Cc:	Hennessey, Jennifer (ECY); RECHNER, MICHAL (DNR); Doug Kess; Casey Dennehy; Rich Osborne; Mike Backman
Subject:	Coalition Comments to Scoping
Date:	Monday, September 23, 2013 11:14:27 AM
Attachments:	Scoping Response.docx CRCFA comments BOEM Marine Water Use Maps - Washington.docx Washington Ocean Policy Management Goals and Objectives EIS Scoping document response 23 Sept 2013 final.docx

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Please include these 3 attached comments and appendix attached to scoping response for the record by

Dale Beasley (for)
Coalition of Coastal Fisheries
Columbia River Crab Fisherman's Association
PO Box 461
Ilwaco, WA 98624
360-642-3942
crabby@willapabay.org

Coalition of Coastal Fisheries would like to again reiterate our objection to public comments periods in general, not just this one, which essentially eliminate those impacted the most from commenting. The best time of year to hear from Fishermen is October, November, March, April – other months make it difficult as fishermen are at the height of their earning months for the year. The best form of communication is through direct meetings with accurately recorded comments with sufficient advance notice and materials prior to the meetings. We do recognized that the comment period was an extensive time frame, but simply not at a time of year to get the fishing fleet actively involved.

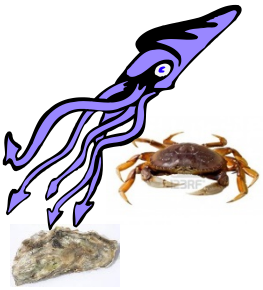
USE MAPPING is marine waters of the coast is the MOST important early stage CMSP activity that exists.

Accurately mapping marine uses that are coastal user group verified will be essential to getting the uses accurately and completely mapped – requires face to face meetings with individual groups.
The crab fishery is a vital component of the coastal economic stability of the coast and needs to be specifically mapped using WDFW logbooks supplemented with historical data (fleet interviews) that pre-dates the Rafeedie decision that radically altered existing use on the coast and created 559 square miles of NO FISHING ZONES for the historical crab fleet and transferred a tremendous amount of effort south of Westport and even more south of Klipsan Beach causing an area of extremely high use concentration. Crab represents 50% or more of total commercial dollar value on the coast and must be mapped for its large

contribution to the coastal economy. Giving crab production the same amount of economic impact as fly fishing from a kayak is an unreasonable portrayal of a communities economic dependence on a marine water use. The BOEM mapping exercise did not capture this use accurately and there is NO Klipsan Line anywhere on the BOEM maps which really distorts the honesty of the use portrayal. **Revision required**.

Thank you for thoughtfully considering our comments,

Dale Beasley



Coalition of Coastal Fisheries

Coastal Office: PO Box 1448, Westport, WA 98595 – 360 268 0076, Fax 360 268 0000
Administrative Office: 5132 Donnelly Dr. SE, Olympia, WA 98501 – 360 456 1334, Fax 360 923 0762

…….Serving the needs of the coastal fishing industry and coastal fishing communities……

Officers
Dale Beasley, President
Bill Walsh, Vice President
Libie Cain, Secretary
Doug Fricke, Treasure, Coordinator

Directors
David Hollingsworth
Bob Alverson
Bob Kehoe
Mark Cedargreen
Bob Lake
Kent Martin
Scott McMullen
Dick Sheldon
Butch Smith
Ray Toste
Louie Hill
Brian Allison
Carl Nish

Member Organizations

American Albacore Fishermen Association

Bandon Submarine Cable Council

Columbia River Crab Fisherman's Association

Fishing Vessel Owner Association

Grays Harbor Gillnetter's Association

Ilwaco Charter Association

Puget Sound Crab Association

Purse Seine Vessels Owners Association

Salmon For All

Washington Dungeness Crab Fishermen's Association

Washington Trollers Association

Western Fishboat Owners Association

Westport Charterboat Association

Willapa Bay Gillnetter's Association

Willapa-Grays Harbor Oyster Growers Association

Executive Director
Ed Owens, CEO
REACT Consulting Group

Olympia Contact
Tom Echols

23 September 2013

Department of Ecology
MSPcomments@ecology.wa.gov

RE: Scoping document leading to Coastal Marine Spatial Plan EIS

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- Primary Goals of Washington Coastal Marine Spatial Planning
- **Protect and Preserve Existing Sustainable Uses**
  - Preserving open public access to marine waters - essential
- Update coastal SMP's & incorporate into CZMA to
- Protect existing use through effective new use criteria & standards
- Build citizen friendly CMSP map & data tool(s)
- Develop a comprehensive "Lessons Learned Document"
- Thoroughly review $2.1 million CMSP spending
- Develop an accountability regimen for $3.1 million CMSP spending that is driven by the primary CMSP goal and supported by critical SMP updates that also direct federal consistency in the OCS.
- Build in informed decisions that are science driven realizing that marine ecosystem science is in its infancy and will still need to be discovered.
- **Establish Moratorium MOU's with FERC and BOEM**
- Establish CMSP as Place Based
- Sufficient outside BONDING to prevent marine waters from becoming a "junk yard" for failed industrial developments – if it floats it will sink
- **Center piece of Washington CMSP MUST** be to preserve freedom of access and movement on marine waters for all this state's citizens
- Washington CMSP needs to answer the question: "What legacy will we leave our grandchildren?"
- Utilize the WCMAC as more than an "illusion" of citizen participation but as a "bottom up" collaborative partner that insures coastal values are incorporated at the heart and sole of Washington CMSP.

The Coalition of Coastal Fisheries organizations listed at the side of this letter represent charter, commercial, fish processing fishing interests and other community organizations along the coast of Washington and beyond representing 1000's of family wage JOBS that anchor the existing sustainable

coastal economy and uses; the lifeblood of coastal communities. We stand firmly united in support of adopting as the primary goal of Washington Coastal Marine Spatial Planning to: **Protect and Preserve Existing Sustainable Uses**. Uses is a broad term that includes commercial and recreational fishing, fish processing, support industries & businesses, a broad range of coastal marine recreation in general, commerce, unimpeded navigation, conservation of natural resources for sustained use for current and future generations, protection for a properly functioning marine ecosystem, shellfish aquaculture, tourism, general public enjoyment, general public aesthetics of marine waters, **open public ACCESS to marine waters** and more that all our state's citizens no matter where they are from currently enjoy in the coastal zone; 0 – 200 miles offshore. This primary goal will serve the state well into the future and protect and preserve ALL our state's citizens **FREEDOM** of public access and navigation to marine waters among other public trusts as the Washington CMSP laws demand.

The real OUTCOME of Washington Coastal Marine Spatial Planning is to provide for existing sustainable employment, food supply, recreational opportunity and revenue, and to achieve these coastal community benefits, conservation and management of fish stocks and marine water habitats is essential. If other beneficial uses that can supplement the economy such as ocean energy, open ocean aquaculture, or other new emerging uses can be located in Pacific coastal marine waters without deteriorating or causing harm to existing coastal economy, JOBS, or the marine environment all the better. If excessive overreach, enormous subsidies, or excessive power rate increases and taxpayer inducements are necessary to accomplish the new use the RISK is too great for Washington to assume. We must also be cognizant that new marine water use produce impacts to real people and their businesses that are the backbone of coastal Washington economy of the present and future generations, not just paper exercises to be accomplished in an evolving and expanding process of ocean zoning.

WCMAC keystone interface

It is essential to involve those people and businesses that will be the most affected by Washington Coastal Marine Spatial Planning early, often, and continuously in a meaningful manner that honestly affects the final plan and establish the WCMAC as the central method of collaboration that brings their needs to the surface and find a way to accommodate those needs. Stuffing the genie in the bottle and corking it is NOT the best path forward to finding durable solutions that addresses the needs of the coast and all of Washington. The intent of SB 5603 was to provide that **bottom up** stakeholder driven coastal connection to Washington Coastal Marine Spatial Planning that gave the coast a direct voice into the "PLAN" in a forthright manner that actually translated into a process that the people of the coast could have a significant impact on the PLAN that first and foremost **"Protects and Preserves Exiting Sustainable Uses, i.e. JOBS"**. CMSP is not a "feel good" or ivory tower activity, it is about providing for the future in a manner that those affected the most can not only survive but actually thrive in a changing world on the coast that is driven more and more by a rapidly expanding population that demands an increasing standard of living on a static land mass that is spilling over into the coastal marine waters in multiple ways.

A Washington Coastal Marine Spatial Plan is not strictly a method of installing new emerging uses into a busy ocean; at this time installing new use is not even a high priority as the new industries are too immature or cost effective to be of any significant impact on our state, its economy, or provide for its energy needs in any meaningful manner any time in the near future. Washington CMSP needs to be a thorough analysis of what exists on the coast and how to increase the vibrancy of the coast that all the citizens of Washington can benefit, including those that live, work, and play on the coast. **CMSP is about taking care of what we already have without destroying it** and finding methodology to make it survive into the future for coming generations. There are a number of "vitals" that need special attention and protection along the way to

keep the lifeblood of the coast pumping. **A significant part of Washington CMSP is helping rural coastal communities meet their existing needs now and into the future:**

CMSP Essentials

1. Establish Protect and Preserve Existing Sustainable Uses as the primary driver of Washington CMSP and put in place concrete actions that support that goal.
2. Realize from the outset that Washington is UNIQUE and does not fit other state CMSP's
3. Channel Maintenance into our ports that provide ACCESS to marine waters for all our citizens must be a prominent feature of Washington CMSP.
4. Establish coastal EFFECTIVE erosion controls that maintain our coastline in place in the face of a rising sea and a truncated sediment supply. The scientist agree **direct beach placement** is the most effective and beneficial use of dredged sediments. Washington needs to pursue this as a primary sediment capture mechanism or face a growing coastal erosion problem that will escalate in the coming years.
5. Protect our coastal citizens and visitors in the face of a catastrophic tsunami event
6. Prevent a catastrophic Oil Spill – Washington needs to put in place a large ship salvage vessel that is strategically located at the Mouth of the Columbia where the majority of oil transport occurs and crude oil shipment is already a significant factor and growing. Port of Vancouver has significant expansion plans for crude oil shipment.
7. Preserve the aesthetic Viewshed that is a major draw for tourism on the coast that serves all our state's citizens
8. Address invasive and detrimental species before they get completely out of control.
    a. Japonica
    b. Ghost shrimp
    c. Avian predation on salmon
9. Develop a mapping tool to map existing uses to preserve them
10. Maintain coastal water quality from degradation; rehabilitation is expensive and ineffective
11. Develop coastal Shoreline Master Programs that addresses and manages growth in a manner that is sensitive to environmental and existing use stability as a significant interface to CZMA consistency requirements to successfully manage activities from 0 – 200 miles offshore
12. **Establish Moratorium MOU's with FERC and BOEM** that delay offshore development until Washington has a CMSP that is in harmony with the coastal SMP's and establishes the CZMA federal consistency requirements
13. Realize that Washington is UNIQUE and does not fit into other state's CMSP mold – criteria developed must fit the needs of different places on the coast – <u>Place Based CMSP</u>
14. <u>Carefully</u> examine the cost benefits of new industries and who will pay for what and how much
15. <u>LOCATION, SIZE, AREA/KW, & CUMULATIVE IMPACTS</u> of new industrial development will be the most significant factors
16. <u>Require substantial BONDING</u> that is sufficient and realistic to removing failed or abandoned industrial development infrastructure.
17. Establish direct industry to industry negotiations on any new use in offshore marine waters
18. Create an atmosphere of expansion of existing JOB types, not just new emerging uses.
19. In order to move effectively forward with Washington CMSP we need a **lesson learned document** that not only includes other state and nation lessons but a complete review of the spending of the original $2.1 million CMSP money and how it significantly and strategically advanced or failed to advance the priorities, goals, and OUTCOMES established for Washington. This is essential before any of the $3.7 million legislative allocation is spent.

20. Start with a review and test drive of the Washington map and data tool being developed in house by DNR and that the material and data in the tool is relevant, is scientifically valid, and meets the intended goals and outcomes for Washington CMSP.

Washington is the 1st state in the nation to develop a Coastal Marine Spatial Plan that does not have a dedicated, predetermined outcome of either installing pending ocean energy facilities or marine reserves making Washington's PROCESS unique and should allow objectivity to break free from other states' CMSP molds cast for dedicated outcomes of installing new and often exclusionary uses into the public domain. The bottom up public history of Washington CMSP has time and again put forward **"Protect and Preserve Existing Sustainable Uses"** as the PRIMARY driver for Washington. Ocean Acidification (OA) has been singled out as one of the largest threats to coastal uses, has garnered a governor's blue ribbon panel, and a separate dedicated OA advisory council to address it. Zoning the ocean to accommodate dedicated exclusive areas for new use is a secondary function for Washington that is predominantly driven from sources outside the state including national pressures to lease large tracts of marine waters to industrial uses that will restrict public access for all our state's citizens. Washington's offshore management has been historically to protect and preserve marine waters for "public use" including the initiation of the Olympic National Marine Sanctuary covering an extensive 3300 square miles of ocean real estate to prohibit ocean energy development (oil drilling specifically) while retaining the historical public trust of fishing, navigation, and public enjoyment.

Washington CMSP scoping document is a precursor to an EIS that will be the legal foundation to developing "ocean zoning" that will have considerable impact on the coast for generations to come and potentially a very large impact to existing coastal JOBS. **Proceed with caution**. An EIS is built around reasonable alternatives including NO ACTION, existing needs, and avoiding reasonably foreseeable impacts to both existing use and environmental integrity. One of our first challenges in establishing any new industrial developments in offshore waters is to determine the "existing" need, if other more reasonable or better alternatives exist, and who is going to pay and is that payment reasonable to "force" on to the ratepayer or taxpayer. In addition the EIS must examine reasonably foreseeable impacts to the coastal communities, marine water ecosystems, natural resources, uses and increased fatalities in offshore waters. A **"FATALITIES"** increase analysis must become a standard of review for any offshore use that restricts public access in marine waters where restricted navigation areas (RNA'S) are imposed. Currently offshore fishing in the Northwest has the highest fatality rate of any occupation in the nation and any offshore development or management decisions that could potentially affect the fatality rates offshore need to become standard analysis that does not increase the RISK of increased fatalities. The recent increase in offshore fishing fatalities in the last decade is directly associated with the tremendous loss of fishing area associated with tribal special management areas (No Fishing No Income Zones) concentrating fisheries unreasonably and forcing tremendous effort shifts to areas south of Pt. Chehalis on the coast driving insanity into the fisheries to feed hungry families from denied access to fisheries resources areas. In energy development RNA's can be avoided if single point moorage systems and low density developments allow navigation and fishing right up against industrial devices similar to USCG navigation buoys allow today. **Power and other cables in marine waters MUST be required to be buried** or they will be unreasonable impediments to fishing and public access.

Washington Needs are Different

Currently all states that have developed Coastal Marine Spatial Plans have followed a format that would automatically lead to a FONSI (Finding of No Significant Impact) through a "process of managing predetermined results". Rhode Island (about the same size as Pacific County with a population of 1 million people) and Massachusetts are small highly populated states with population densities that discourage

shoreside renewable energy development in busy neighborhoods. Wind turbines are not exactly aesthetically pleasing features on ordinary street corners and they are noisy nuisance machines that are very difficult to insert in any reasonable fashion into urban areas where everyday citizens reside; much more objectionable than cell towers which are not as high or wide as offshore floating wind turbines that will reach 550 feet in height or more and be substantial distractions on the horizons. They are unreliable and produce NO energy when the wind is calm which means that they will never be a sole source of electricity and will always **need** a complete backup system that will be charged to the electric ratepayer at considerable added expense and these backup systems do not easily cold start so need to be run most of the time whether they are producing a load or not increasing operating expenses with minimal carbon reductions. These states that first developed Coastal Marine Spatial Planning have fairly high electric rates and high dependence on carbon sources for electrical production and do not have the same **'needs'** as Washington which has low electric rates, almost carbon free electrical production, and a lot of willing property owners that encourage development of renewable wind energy on their property that is a considerable distance from any urban areas. Fly into Providence or Boston and then take a road trip to Klickitat County and visit Bickleton, which by the way has a population of 90 and has a brand new school system that has benefitted immensely from the development of the wind turbine industry and the significant added tax base in the area which will not be available if the development is from a BOEM OCS lease where only 27% of the lease which the state cannot adjust is forwarded to the state, not even the affected host community. Even Bickleton has addressed the aesthetic aspect of wind turbine industrial development - you cannot see or hear even one turbine from downtown. The Bickleton type area is not only a superior alternative to offshore energy development but is also a "willing host community" in which to expand alternate energy sources and benefit the community into which it is inserted. Attempting to FORCE ocean energy into communities that will suffer immense insults with a very high probability of considerable reduction in economic opportunity is a far cry from what this state can accomplish in other areas of renewable energy development. Just because it may be OK offshore Rhode Island or Massachusetts does not automatically make it RIGHT or SMART for Washington to follow down the path that has been paved by other areas of the nation that have different 'needs'. Block Island, Rhode Island's current electric rate is $0.50/KW and diesel driven; yes they 'need' to develop alternative renewable energy now and the economics of that situation drive that island community to seek a better overall solution. Yakutat, Alaska is in a similar need.

Washington is Unique

Washington is different. We have a different "need" and there is NO PRESSING NEED to force very expensive, unreliable, alternate energy onto our coastal communities unless they ASK for it and at $0.075/Kw to the consumer that will not happen anytime soon except in remote areas where electrical outages can be prolonged such as Neah Bay which may be an exception in need. Yes there is an untapped energy source off our coast and Washington can develop it when the 'need' arises sometime in the distant future. If Washington is S.M.A.R.T. we will strive to develop other alternatives sources of energy that are much more cost effective like CONSERVATION and underutilized hydropower; even land based wind turbines are beginning to become more competitive if one neglects to see the full cost to the taxpayer who subsidies them with enormous feed in tariffs and tax incentives, even to the point of paying them when the turbines are shutdown affecting all the citizens of Washington through onerous subsidies. The consumer and the taxpayer have a right to make a choice to where to put their hard earned incomes relative to the 15% renewable energy mandate and those electrical consumers are becoming much much more vocal in our area even over the expansion of our local P.U.D. into an area already served by Grays Harbor PUD. Consumer awareness must increase long before the price of their monthly electric bills and it is unreasonable to force a substantial increase in monthly electrical rates without a VOTE of the people that will be affected the most; those living and working on the coast. No ordinary ratepayer would vote to

increase their monthly bill by any significant multiple and especially multiple 10X for offshore energy given the opportunity to weigh in on the decision in advance. Washington CMSP does not automatically have to become a process to insure new unstable immature developing industrial developments with a very high likelihood of failure that are to be given a "FAIR" or is it "UNFAIR" allocation of productive fishing grounds to promote idealistic ventures at ratepayer and taxpayer expense with next to zero impact on improving carbon emissions in Washington. Include by reference the "Tacoma Narrows Tidal Power Feasibility Study".

Washington CMSP must be DIFFERENT and must not become an automatic FONSI that opens its arms to shysters that are in it only for the subsidies to make a JOB for venture capital investors to make a quick profit and move on once the huge federal subsidies run dry. Washington needs to investigate the financing of OPT, where the money came from, and how CEO's benefited a second time from insider trading of company stock at its zenith and investors lost their shirts to get a better understanding of the culpability associated with these speculative ventures and who if anybody in this state will benefit. There are few Tesala success stories associated with investments of public money in venture capital arena's. This scoping document put forward as a precursor to an EIS needs to include an HONEST evaluation of the cost and benefits of any offshore industrial electrical development with a vivid explanation of who is going to pay and a realistic estimate of what that payment will be per month for an affected electrical customer from a project including cumulative impacts affecting the consumers ability to pay as coastal rural counties have some of the lowest standards of income in the state and must be considered for access to equal justice and defended from ideologues that never face the realities of overly subsidized grandiose scheme that suppress local economies that rural Washington depends upon for their survival. Europe gives us a strong clue for what is in store for consumers if we go down this very bumpy road to developing and PAYING for offshore energy industrial developments that which have a large probability to actually fail. The question that needs to be answered in an EIS is who will pay for the electricity generated offshore and how much. Will Seattle pick up the increased cost of the electricity and pay a monthly subsidy fee or will it be shuffled to the coastal residents exclusively to pick up this excessive tab. This is not like collecting a gasoline tax, putting it into the state general fund and then deciding which highways get built or repaired or who gets a new bridge built based on need. Places like Seattle and Tacoma have built their own dams and produce a lot of their own electricity at competitive hydropower rates. Are they going to agree to triple their power rates to subsidize the coast? Who is going to purchase this extraordinarily expensive electricity and why? What kind of power purchase agreements are going to be required for this electricity to reach any market at any reasonable price. **The worst case and totally unacceptable scenario** for offshore industrial development would be for the coastal communities to suffer significant loss of high value fishing grounds and have an offshore electrical investor plow an undersea cable straight to central or southern California devastating local economies while supplying electricity to pump water from places like Mono Lake to Los Angeles to fill swimming pools or additional green golf courses in the back lots of movie moguls while 1000's of migrating grebes succumbed in the hot sun from starvation when the shrimp in the lake did not have sufficient cool water to reproduce. An EIS must examine potential environmental impacts that may occur a long way from the immediate impact area.

Precautionary Development

An EIS must continually survey and monitor changes to Existing Sustainable Uses imposed by new emerging industrial development which must occur through utilization of the **"Precautionary Approach"** with a continual evaluation of unintended and CUMULATIVE impacts to insure existing uses remain healthy and economically viable into the future. New emerging use demands must not push up against the existing use fatality thresholds since individual uses and especially the younger elements in existing use are the most vulnerable to toxic effects of lost ACCESS to ocean real estate in which to operate as each and

every new ocean zone and every marine waters restricted area has an impact that may be difficult to measure even at low toxicity levels. We need to concentrate on those most vulnerable in the coastal zone, the impacts to youth as they are our future and have much less tolerance to incremental assaults on their survival and impacts may not be readily apparent until they are lethal where toxicity levels affects vary individually on those that are the most vulnerable to any levels of loss even including low levels of loss. Young people trying to break into traditional marine water industries usually have a number of substantial mortgages: home, vehicle(s), business, permits, and multiple other large financial obligations that make life tough enough without putting additional limiting criteria on their financial survival. In early December 2007 the coast experienced a traumatic storm event that not only blew down millions and millions of board feet of timber, wreaked havoc on hundreds of shoreside structures, but also blew crab pots all over the ocean, some up to fifty miles from set position. That year saw five new entrants drop out of the local crab fishery, 4% of the overall fleet and 100% of the new young entrants in our region of the coast – even low industrial development toxicity levels will be traumatic to the future of the young on the coast – all life stages must be factored into management decisions that impact real people not just an entry on a spreadsheet tracking some statistical endeavor.

Location

LOCATION of industrial development to avoid catastrophic events will be essential to all CMSP. If an ill placed industrial marine hydrokinetic facility with its spider web of tri-point interconnecting anchoring system had been located anywhere in this nearshore area during that horrific 2007 early December storm an entire fishing communities could have been put out of business in just one catastrophic storm event as the majority of the fleet's crab gear would have been irretrievably tangled in one huge Lilly pad wrapped around an ill-placed industrial development. This RISK associated with gear movement is much much higher off the Washington coast than other states and can be visualized by reviewing the UW Mass Weather Index that makes Washington UNIQUE compared to other states in the nation. San Diego is a 10, central Oregon is an 80, Neah Bay is 130 with central Washington at 110. Any index over about 90 dramatically increases the risk of catastrophe to existing coastal uses. MHK ocean energy devices anchored off the Washington coast will be much more ocean real estate intensive per Kw of electrical production as anchoring scopes will need to be increased substantially to withstand the rigors of more and intense storms than other areas of the nation including our immediate neighbor to the south in Oregon which does not experience winter time storms nearly as frequently or as intense as in Washington's coastal zone.

Area/KW standard

Washington, out of necessity to **protect and preserve existing sustainable uses** will have to pick winners and losers as ocean energy moves into Washington offshore waters. Not all ocean energy devices are created equal and many will be unacceptable in the amount of area they consume for the electricity returned. One of the standards that will need to be developed is the area/Kw ratio that maximizes electrical production for the real estate consumed. Example: it takes over 70 OPT 150KW power buoys to equal the same output potential of 1, yes 1, Principle Power 6 MW offshore wind turbine. Another example of an unacceptable ocean energy device may be displayed by the Resolute Marine Energy that has applied fo a preliminary FERC permit covering 25 square miles of ocean to service 675 residents in Yakutat, Alaska through a single wave energy generation facility. At that rate electrical production to supply just the coast of Washington it would take an ocean area greater than two times the size of the Olympic National Marine Sanctuary totally displacing every existing use on the coast today; a scenario that is not acceptable and definitely not contemplated in any law in Washington. Efficiency of ocean real estate will need to become a standard utilized to verify if a particular device can be put in Washington and OCS waters. Winners and

loser will be necessary and the **Precautionary Approach** to installing offshore industrial facilities will need strict adherence to a reasonable area/KW ratio at a cost benefit ration that all the citizens in Washington can afford to pay without substantially lowering our standard of living on the coast as Puget Sound continues to utilize cheap hydropower. Offshore energy devices will need to be tested for area/KW and final cost to the consumer as a requirement to be permitted off the Washington coast. The new Oregon NEMERC test facility with grid connection should be utilized for this testing since Washington and Oregon have agreed to split testing of marine electrical generation devices. Washington has already chosen tidal energy for testing and collecting of federal developmental subsidies and allocation of hydrokinetic devices has gone to Oregon by a default planning process that did not involve this states citizens. As Washington moves into the offshore industrialization and potential electrical production it is imperative to understand how much area of ocean will be consumed to acquire the equivalence of a 1000 MW of production for each device proposed for installation in offshore waters in order to pick those with the most to offer for the public area restricted and if that amount of area is even acceptable to compatibility with existing use. How much the feed in tariffs are going to cost the electrical consumer and the impact on existing electrical rates, and the total impact to the state and federal taxpayers for subsidies to generate the 1000 MW, equivalent to 1 Bonneville Dam. Washington needs to investigate the potential total carbon reductions accrued through implementation of renewable offshore energies and investigate the realities of potential overall carbon reductions and what the cost benefit ratio of those reductions are to see if the state can honestly afford to invest at a rate that will not explode our required balanced budget in Washington state.

Classified Conditional Uses

New emerging industrial uses in marine waters of the Washington Pacific coast are allowed as **conditional uses** that avoid conflict and harm to existing sustainable uses. Many of the conditions are stated in Washington laws and need to be refined through the Washington CMSP process that may ultimately lead to additional conditions in the law. Oregon has been modifying their Territorial Sea Plan with part 5 Amendments and this most recent Oregon legislative session spawned a myriad of additional laws to better define deficiencies discovered from actually grappling directly with unsuccessful marine energy devices placed in offshore waters (**corrective legislation from lessons learned**). These laws in Oregon in 2013 should be examined for inclusion into upcoming Washington CMSP legislation – change Oregon has found necessary in the heat of action of moving industrial development offshore into areas of use that has proven to be excessive to coastal communities; a lesson Washington MUST learn and adjust before damages to existing uses occur and to avoid conflict and harm.

Continual Adjustments
Adaptive Management
Lesson Learned

- SB 580-A – Oregon OPAC to appoint & maintain a STAC committee (Scientific & Technical Advisory Committee, expands responsibilities
- SB 605-B – Oregon OPAC recommendations must be acted upon by DLCD Commission or sent back to OPAC for revision – <u>cannot be ignored</u>
- SB 606 – A – Requires defunct wave energy facilities to be removed, imposes civil penalties for failure to remove, sets up fund for compensation of commercial fishermen from unintended consequences of industrial development
- SB 737 – B – Establishes Oregon Ocean Trust Fund, set up work group to administer and develop Nearshore Strategic Plan; requires legislative report

- HB 2694 – A - Requires ocean energy developers to publically share geological and geophysical mapping data as a part of the public domain

An EIS needs to examine these recent Oregon legal changes as CMSP "Lessons Learned" so that similar recommends can be considered for them for inclusion into Washington law to facilitate better solutions.

Washington CMSP 0 – 200 miles offshore

This scoping document for a MSP on the Washington Pacific Coast is the **1st step to ocean zoning** through a recent process that has been evolving through CMSP legislation for a number of years including SB 6350, SB 6263, and SB 5603. CMSP also relies heavily on the Shoreline Master Programs, ORMA, and other historic state ocean/estuary associated state and federal legislation. CMSP is also strongly influenced by actions taken in other states and nations including some laws and treaties dating back to Roman times. The Public Trust Doctrine is an essential consideration. **"WARNING"**: the Stevens Treaties on the Washington Coast are federal obligations NO other state in the nation must negotiate regularly like Washington making sustainable existing uses in Washington offshore waters <u>much more vulnerable to low levels of toxic industrial effects</u> from restrictions or loss of public access to marine waters real estate than any other state in the nation. National Ocean Policy is spreading its wings without one of its goals to sustain coastal communities and is failing to maintain federally authorized channels that connect our small coastal ports to the sea – fundamental flaw in all pre-existing CMSP programs of other states; a flaw that Oregon recently corrected at state expense of $4.7 million for a one time channel maintenance of 5 Oregon coastal ports' channels setting a very bad precedent for other states. Washington has been granted authority to manage Dungeness crab out to 200 miles offshore by congress. Congress did not truncate this crab authority at anything less than 200 miles even though the known range of Dungeness crab does not extend much over 200 fathoms offshore. The United States has treaties with many other countries that can affect our coastal zone out to 200 miles and even beyond that the state may need to comment on to protect our interests in international relations, such as the use of Columbia River water or the Canadian tuna treaty that definitely goes to 200 miles and beyond. And of course the Coastal Zone Management Act allows the state some control of federal actions affecting the state's coastal zone out to 200 miles from shore; a very important legal hook dealing with the USACE, FERC, BOEM, NOAA, EPA USFW, BIA, and other federal entities. The CZMA is congressionally authorized without any qualifiers from 3 to 200 miles. There are NO intermediate determinations in the law that limits the CZM authority to any distance less than 200 miles. Some (including NOAA) may "try" to truncate that broad federally granted authority with rigid interpretations of the term "reasonably foreseeable" through short sited lenses; through erroneous reasoning. In addition, Washington CMSP law requires **Washington CMSP to extend from shore to 200 miles offshore** in concert with federally granted authority; anything less would be truncating congressional and legislative law. Any reduction of the Washington 200 mile CMSP would be found in error by the US Supreme Court that has maintained a presumption against federal preemption unless an action frustrates the sovereign domain of the government of the United States. There is nothing in Washington extending its CMSP from 0 – 200 miles offshore that automatically frustrates the sovereign domain of the United States of America. Everyone associated with this issue is encouraged to comprehend the pages of a treatise researched and developed by the Coastal States Organization called, "Putting the Public Trust Doctrine to Work", 1997. This treatise will keep a trove of lawyers busy for a long time researching all the case law associated with the Public Trust. Marine law is a specialty law that has many origins dating back to long before the United States was a sovereign nation that must not be "flippantly" set aside with an artificial and cupreous action truncating our states sovereign authority by some that will never even feel the consequences of such ill placed actions, but many will suffer as a result in the future, guaranteed.

There is NO compelling reason what so ever to truncate Washington CMSP at anything less than 200 miles. Remember ecology truncated Washington interstate CZM authority and the coast has suffered multiple consequential results for years. CRCFA has sought to change that self-imposed curtailment of Washington CMS authority for 15 years and has been forced to watch the USACE increase crab and fishermen mortality substantially over the years by opening a hard fought biologic crab protection window and exceeding the accepted 10% limit on mound induced wave amplification that CRCFA won in a federal court case that the feds flew lawyers in from the justice department in Washington DC. We were naive enough to think that state and federal agencies would do the "RIGHT" thing by the coastal communities and the crab resource and keep the hard won court ordered protections in place; WRONG. In our lawsuit we agreed to allow the coastal protections to expire after the dredge disposal sites were converted from 103 temporary sites to EPA approved long term sites through the existing processes in place that were supposed to protect the coast from degradation; MISTAKE. We were not fully aware of all the legal possibilities and nuances of a truncated CZM authority and that Oregon our neighbor did not require mitigation for damages to natural resources or use in the ocean like Washington – out of state cumulative impacts do seriously affect activities and economies inside Washington as natural resources do not recognized artificial state boundaries on a map. As a consequence, Washington gets NONE of the dredged sediment from the Mouth of the Columbia River (3 – 5 million cubic yards per year) it all goes to Oregon disposal sites and they do not get any of it any place that actually benefits their coastal shoreline in any measureable manner. Truncation of Washington CZM authority at any level short of that granted by congress will come back to haunt this state, the coastal communities, and negative impacts to our coastal zone in ways we currently cannot perceive. Our coast of Washington is beginning to suffer substantial erosion from starvation of the Columbia River sediment supply from actions that cannot be addressed because Washington prematurely truncated federal CZM authority without enough vision to see the consequences of their actions unfold as the shoreline advances toward downtown Long Beach unabated. The coast will pay substantially if the CMSP does not include the entire congressionally authorized coastal zone from 0 – 200 miles offshore. **Promises will be broken**. It is harder to break the law if citizens have the legal right to go to court to remedy a problem that has not been prematurely tampered with by unnecessary truncations imposed by agencies at either the state or federal level without considering future needs that are yet unknown.

Public Trust Doctrine

Under the Public Trust Doctrine the state has the right to modify the historical definition of the Public Trust giving various states the ability to be different from their neighbors. One public trust in Washington that is Unique is that private ownership of submerges lands is not only possible but encouraged and has led to Washington shellfish aquaculture to become a national leader in oyster, clams, and geoduck production contributing substantially to our states overall economy. In other states submerged lands are totally in the public domain, usually to the high water line; still in Washington navigation on water over private property is still permitted showing the strength of the Public Trust Doctrine to protect this sacred public access and freedom to navigable waters that extends to ALL our state citizens. Breaching this navigable waters trust would be an appalling deviation from historical public domain no matter the precedents recently set in other states. Industrialization of our offshore waters will bring restricted navigation zones where the public is excluded. This change must be considered very carefully "if" it is initiated.

EIS is a PROCESS

An EIS is a legal document to install a proposed action that will have a substantial effect on the "human" environment and impacts to use. The scoping document is a guide as to what material information will go into the coming EIS for Washington CMSP including all reasonable alternatives and justifications for dropping alternatives from consideration. After proper evaluation of ALL alternatives effects on the coast,

a preferred alternative must be selected through coordination at the local levels making sensitivity to **place based CMSP** a preferred option. The Washington CMSP EIS is a proposed action to "zone" marine waters that will result in specific areas becoming "restricted areas for public use". The purpose of an EIS is to promote informed decisionmaking and to allow "all" interested parties to participate in the process, early, and continuously. An EIS acts as an enforcement mechanism to ensure that the government agencies adhere to the goals, policies, and priorities outlined in the laws of the land; in our case the most important law will be the Shoreline Master Program and its legal hook to the CZM consistency to protect and preserve existing sustainable uses in the coastal zone 0 – 200 miles offshore. An EIS should be created in a timely manner as soon as the agency is planning development or is presented with a proposal for development – ecology is following this requirement by starting us down this legal path issuing a scoping document. The EIS should use an interdisciplinary approach so that it accurately assesses both the physical and social impacts of the proposed development or action in the coastal zone. In many instances such as zoning the offshore marine waters from 0 – 200 miles offshore, an action may be deemed subject to federal NEPA's EIS requirement even though the action is not specifically sponsored by a federal agency. Ocean Zoning is an instance that will 'federalize' this zoning process for the purposes of NEPA compliance. These federal factors which are reasonably foreseeable may include actions that receive federal funding, federal licensing or authorization, federal leases, or that are subject to other federal control. Even establishing an ocean energy facility totally in the state's jurisdictional area 0 – 3 miles is a federal action if MHK (Marine Hydrokinetic) devices require a FERC permit is an example to trigger NEPA requirements that require "local" coordination and we are asking.

The proponents of an EIS almost always without exception try to drive the end result to a FONSI (Finding of NO Significant Impact) which allows the activity to move forward as proposed or with minimal conditions that allow the action to move forward. EIS sponsors always present every possible positive aspect of a proposal and almost never give equal footing to the negative impacts a proposal may create. Very often negative impacts to the localized host community are given no serious consideration, most often discounted, and "balanced" to the greater "good" of the state or the nation. The coast has already heard the word "BALANCE" enough to become highly concerned for the outcome of any Ocean Zoning EIS. **Balance is another word for discounting local impacts in the "process"**. EIS's are usually based on alternatives and needs including no action alternative by which impacts are supposed to be judged for ecosystem and use impacts that include socioeconomic and human impacts. All reasonable and prudent alternatives to avoid consequences and the required "hard look" from impacts to existing uses of real people and the business backbone of coastal Washington MUST be presented in a CMSP EIS with a **high standard of certainty to avoid those impacts**; impacts that are especially relevant to responsible stewardship of general public access to marine waters, with a preference to multiple use must be **the center piece of an CMSP EIS** that protects all our state's citizens freedom of marine water access and freedom of movement.

Conflict resolution can be effectively carried out where competing industries are allowed and encouraged face to face negotiations that allows differences to surface, be allowed an opportunity to be addressed in a forthright manner, and a way to work through those differences provided allowing any substantial agreements between the industries to become integral to conditions associated with permitting processes that allows new use into any existing use areas. This type of an agreement if it can be reached is far more enduring and could possibly eliminate any later court activity associated with the process and provide a degree of flexibility to solve contentious issues and better serve those most affected by potential conflict associated with adding new use in marine waters.

Ocean Zoning – why do we even 'need' it?

The coastal communities of the Washington coast 'need' a comprehensive Coastal Marine Spatial Plan to "Protect and Preserve Existing Sustainable Uses" from excessive industrial development in marine waters that will by their very existence displace or disrupt existing use in multiple ways if they are allowed to grow in the ocean randomly as a result on an unstructured FERC ocean energy permit process that issues preliminary permits to anybody that can fill out a basic application form and divvy up the ocean wherever anyone requests, which is usually close to port infrastructure in high value fishing grounds. This helter skelter process needs some structure or industrial development will overrun existing use completely. Washington CMSP legislation in combination with other existing law was designed to allow new emerging uses but those new uses cannot conflict or harm historical uses. Over 50% of the nation's population lives within an easy drive of the coast; a population that is expanding at a phenomenal rate placing inordinate demands on the coastal zone that it will not withstand without a comprehensive plan to properly control growth that is protective of the fragile marine ecosystems that support the coast. No matter the rhetoric, industrialization to support population growth without exception in the history of the world always brings environmental degradation. In addition Washington is going to get CMSP in federal waters from 3 – 200 miles whether Washington acts or not. National Ocean Policy has explicitly omitted "the sustainability of coastal communities" as one of the national goals for developing NOP. Washington needs CMSP to promote our coastal values and needs or they will be overrun and buried without even a chance to "Protect and Preserve Existing Sustainable Uses". Washington CMSP is an opportunity to influence the nature of the coast for future generations and direct growth in a manner that is acceptable to coastal communities. Washington has been putting forward our state's values for quite some time in the area of Coastal Marine Spatial Planning even though it may not have been labeled that in the past. The Olympic National Marine Sanctuary is such a statement. The sanctuary was put in place for one reason – to stop industrial energy production off our coast placing a very high priority on environmental protection while preserving existing sustainable uses, i.e., fishing, public navigation, but has over time addressed industrial threats like oil spills by moving oil transport further offshore and prohibiting cruise ships that dump massive quantities of sewage at sea. Often this type of planning is done in the rear view mirror after a 'need' rears its ugly head. Multiple new uses are coming to Washington waters besides development of ocean energy like Montana coal exports and crude oil shipments from the Dakota's Balkan Formation that are currently undergoing scrutiny in other venues but are definitely CMSP issues that need to be fully considered and oil spill prevention measures put in place before a spill occurs. The New Carissa marine casualty should have taught us that clean up in mid-winter on the Pacific Coast is a non-starter – **Oil Spill Prevention is the only option**. Included by reference is Cosco Busan Oil Spill Natural Resource Damage Assessment.

Coastal Marine Spatial Planning is an opportunity to get ahead of events and put reasonable conditions and standards in place, to specify monitoring and intervals of that monitoring, prescribe process and process steps for marine water development from 0 – 200 miles offshore. A Coastal Marine Spatial Plan is a major action with the potential of a significant impact on the human environment, coastal economies, and uses requiring local coordination.

Washington is UNIQUE

Washington is UNIQUE in this nation and our CMSP cannot be satisfied by "mimicking" any other state or nation CMSP's, goals, objectives, limitations or excesses even though there are many "lessons to be learned" from their CMSP that can be reflected in our process moving forward. What makes Washington CSMP Different than any other state?

- Federal obligations to historical tribal treaties. Five nations want control. Considerable impacts and NO FISHING ZONES already cover 559 square miles of ocean off northern Washington.

- Olympic National Marine Sanctuary covering over ½ the state and over 3300 square miles of ocean
- Highest Mass Weather Index in the nation – San Diego @ 10, Neah Bay @ 130
- Washington has NO dedicated driver like pressing ocean energy permits or additional marine reserves forcing action
- **Washington CMSP needs to be 'place based'** Neah Bay and Willapa Bay are different, different players, different needs, different existing uses, different opportunities, different ecosystems, just plane different and one size shoe does not fit every place. The Washington legislature recognized these differences when they set up the Shoreline Master Program at the county level that places even in Washington are different, let alone trying to force a uniform national ocean policy that may fit Mobile Bay but certainly not Grays Harbor.
- Washington needs to get its Coastal Marine Spatial Plan in place that meets the needs of the Washington coast and only then address how Washington fits into a larger coast wide and national ocean plan that is tailored to fit our needs, not New York or distant Arctic waters so that we can allow our unique cream to rise to the top to be the best it can be instead of homogenized to fit into a uniform CMSP mold.
- Other states may have a dedicated need to develop ocean energy that does not exist in Washington today.

Setting Priorities and Reasonable Spending Limits

In January of 2013 the Pacific County Marine Resources Committee re-examined the current $2.1 million CMSP spending and realized that Washington does not have enough tax revenue to wade chest deep into an area of science that is in its infancy such as marine waters ecosystem management that also includes socioeconomic consequences for the coast. PCMRC had recognized many months earlier that we would need to set necessary limits and choices as to the priorities necessary to create a competent Washington Coastal Marine Spatial Plan based on credible information at a level to make informed decisions in the future. PCMRC reiterated our concern and frustration at spending our small allocation of CMSP funding without any Goals or declared OUTCOMES of CMSP. To facilitate and accelerate some of the important choices that are still necessary we presented all the coastal MRC's and the WCMAC with our priorities listings for consideration; something we had been grappling with for over a year. These priorities still need to be accomplished. PCMRC utilized the Nichols Principle of keeping it simple and focused to achieving meaningful outcomes that "Protect and Preserve Existing Sustainable Uses" and that the CMSP funding was finite and the spending had to produce a significant cost benefit ratio related directly, not loosely to desired outcomes associated with Washington CMSP. **The Coalition of Coastal Fisheries, the Columbia River Crab Fisherman's Association, and the Washington Dungeness Crab Fishermen's Association as interested and most affected parties to this scoping document and pending CMSP EIS** has requested of Washington DNR and ecology a full accounting of the original $2.1 million CMSP spending and ALL the associated presentations and results associated with that spending to better facilitate and improve the accountability of the future spending of the $3.7 million legislative allocation and to date have NOT received sufficient information to make any informed decisions moving forward. That request for ALL information is again reiterated here in including a detailed accounting of all the dollars spent and all the reports generated. Hopefully we will not be forced to file an extensive FOIA request.

Channel Maintenance

Oversight of obvious deficiencies in protecting existing uses was that for any activity to move forward on the coast it is **essential that channels are maintained to federally authorized depths** – another essential

that National Ocean Policy also failed to place as a necessary goal. Without channel access to marine waters the rest of CMSP is really irrelevant to sustaining coastal communities or our ability to grow.

Washington Coastal Marine Spatial Priorities

First and foremost CMSP is about people: their lives, safety, economic security and quality of life. Washington is the first state in the union to develop CMSP without a dedicated, predetermined outside driver (ocean energy, marine reserves).

The top priority for Washington CMSP is to protect and preserve existing sustainable uses.

The following list details the targeted priorities and outcomes that will take the state to 2050 and beyond. This list is prepared to minimize and avoid unnecessary data collection and analysis that is not directly germane to desired outcomes and priorities of Pacific Coastal Washington CMSP with a focal point to greatest potential impacts to the coast and lends significantly to the planning process considering the limited funding available that is responsive to identified issues that reflect the degree to which local areas depend upon marine waters for their economic stability.

Washington CMSP elements in order of priority:

1. Protect and preserve existing sustainable uses, and assure any new uses have no negative impact on these uses.
2. Effectively engage all local, state, federal, and tribal partners at a single decision making table – WCMAC to solve coastal problems and develop Washington CMSP as a unit incorporating a bottom up approach that includes all the citizens of the coast and especially those citizens most affected by ocean zoning.
3. Develop "Lessons Learned" document on MSP issues by reviewing information developed in other State, Province and Country MSP efforts. Utilize this document to build on other CMSP successes and products [ocean energy siting criteria and standards, environmental protections, fisheries protections, tools, intended outcomes] to develop a process for Washington that fits this state's "Unique" situations.
4. Identify all existing uses agreed to be a part of CMSP and ensure those stakeholders are represented at the WCMAC decision table to openly allow reasonable discussion and resolution of their issues.
5. Develop a list of the top marine water indicators and utilize this list in the setting of CMSP priorities that are appropriate for the coast of Washington.
6. Identify and prioritize the top ten data layers to put into a mapping tool. Ensure these data layers are prioritized in initial CMSP funding plan and are based on actual contributions to existing uses, coastal economy, culture, environmental integrity, and other measurable elements that are tied to coastal economies, environmental conditions and sustainability. Complete a secondary list of layers to be added to this mapping tool as time/funds become available. Maintain priority data layers based on deliverables as noted. Keep it as simple as possible so the citizens of this state are not overwhelmed in sorting through inconsequential minutia (surf smelt, rock cliff erosion rates, etc.) clouding informed decisionmaking.

7. Complete a literature search of all existing data to support initial mapping effort of identified existing uses and verify its scientific integrity and usefulness, not just availability that could have significant flaws and lead to erroneous solutions. Include spatial needs, economic impact, production, and other indicators that are already documented. Create a "lessons learned" map to help FOCUS our efforts to the essentials necessary to move Washington CMSP forward within the budget that the legislature has supplied. Funds are not unlimited or guaranteed beyond this biennium. Washington has had access to $5.8 million; we need to be very specific targeting specifics necessary to produce a meaningful plan that protects Washington.
8. Identify data gaps in existing data and develop plans within the allocated funding stream to fill those gaps.
9. Identify data gaps necessary to make informed decisions on potential new use allowances.
10. Develop long term CMSP funding plan based on gap analysis to assure data gaps are filled per established priority and within funding allocated.
11. Develop user-friendly, transparent, easy to use, comprehensive, interactive, and available data mapping and presentation tool(s) that are easily web accessible and free to the public that leads to desired outcomes tied directly to Washington CMSP goals that will allow the general public to come to the same conclusion relative to Washington CMSP that agencies will by exploring and analyzing the information presented.
12. Develop peer-reviewed, objective economic baseline analysis of existing coastal marine water uses for each CMSP county. This is to be prepared by an expert marine economist. Update this base line analysis every ten (10) years, or as necessary if new developments arise, to assure alignment with coastal community economic health is retained in CMSP process and that the next generation has a viable pathway to continuing the economic baseline.
13. Complete a Strengths-Weakness-Opportunities-Threats (SWOT) analysis in regard to CMSP issues with emphasis on preserving and protecting existing sustainable uses. SWOT emphasis is to be prioritized based on identified significant marine indicators including socioeconomic indicators like number of marine water dependent JOBS on the coast: increasing or decreasing.
14. Develop a precautionary approach of phased development with quality monitoring to insure coastal compatibility. Provide a clear path to YES for new emerging growth areas that are compatible with coastal communities, coastal economies and local environments, with an equally clear path to NO for potential new uses that negatively impact existing uses and/or do not result in coastal economic or environmental sustainability.
15. Develop CMSP within existing laws, rules, regulations, treaties, & court rulings while adding support for updates to Coastal Shoreline Master Programs as required by the legislature, resulting in an improved CZMA consistency interface reflecting Washington coast's distinctive values, needs, pristine and highly functional ecosystems, and economic vitality.
16. Develop recommendations county by county to promote an interface between CMSP and SMP. This includes review of SMP to identify those CMSP variables that overlay onto local SMP categories. Recommend a baseline strategy and process to county governments in regard to the

development of policy structure that the Washington CMSP can fit successfully into, i.e. place based CSMP that allows localized differences within this state's overall plan even beyond the legislatures 3 designated areas of CMSP development: Puget Sound, Columbia River, and Pacific Coastal marine waters.

17. Develop a long-term plan for CMSP policy development structure that includes both local and regional CMSP policy bodies. Determine what level of policy authority a coast-wide body will have. County-level CMSP policy bodies will retain local authority.

18. Cumulative impacts that tend to degrade Washington coastal existing sustainable uses must be monitored regularly and can accrue from sources outside the state and as far away as Alaska and beyond must be a significant part of the impact analysis if the uses are to be protected and preserved. See example slide.

In addition Pacific County Marine Resource Committee submitted a highly prioritized list of elements that could be in a Washington Coastal Marine Spatial Plan to FOCUS effort and spending moving forward. This list eventually went to all the coastal MRC's that participated and was revised at the WCMAC. This list is a continuation of those FOCUS lists that is cognizant of our existing funding level which has NO guarantee of additional funding beyond this legislative biennium and needs to be spent accordingly developing a Washington coastal CMSP through developed priorities that have been addressed by affected coastal citizens.

Washington Coastal Marine Spatial Planning

Priority Listings in CMSP Area: 0 – 200 miles

Vetted at Coastal MRC's & WCMAC with regional differences (included be reference)

WCMAC Mission Statement: The Washington Coastal Marine Advisory Council is a strong voice for coastal communities on marine resource issues, protecting and preserving existing sustainable uses, marine-based economies and healthy marine ecosystems.

Washington coastal marine water strategy includes the development of a Coastal Marine Spatial Planning tool. This online mapping program will be publicly accessible, easy to use, and include data layers that policy makers need to make competent decisions about the condition of and impacts to coastal resources and uses when evaluating current and ongoing uses and potential new industries located in the coastal zone including the full economic zone from 0 – 200 miles offshore.

These lists are designed to focus what are the most important priorities for addressing Washington CMSP spending plan and the most important data sets for making informed determinations about ocean zoning and may need to be re-examined as they are already a year since conception.

List top five (5) intended outcomes of CSMP; refer to WCMAC mission statement at every entry

1. Protect and Preserve sustainable existing uses (JOBS)
2. Maintain health marine waters and ecosystem function
3. Control coastal erosion; establish coastal sediment rights, put USACE dredged sediments to the most beneficial direct beach placement as the best option developed by all the technical and scientific experts at the second Cape Disappointment Technical Forum hosted by the Lower Columbia Solutions Group in 2007.
4. Improve human health and safety; reduce fatality rates in marine industries
5. Establish principles and conditional standards for emerging new uses of coastal waters to be applied to CZMA that protects existing use as our CMSP laws were designed to do.

List top ten (10) items to place on a CMSP MAP. These are active uses that make up map layers.

1. Existing uses 0 to 300 fathoms, with intensities (number of boats, number of permits, catch, etc.) Place an emphasis on coastal community economic dependence on a particular use to that areas economic vitality. Example: shellfish aquaculture is essential to Pacific County economic health where recreational dog walking is less impactful than frequent openings for clam digging season. Some uses are essential to an area's economy others are simply nice amenities; both need safeguarding.
2. Recreation Areas: All beaches and surf zones are important public access/recreation areas. Delineate these, including public access routes (trails, paths, approaches) so that agencies and state government understand where these are located. Indicate species harvested by public in each area (razor clams, Dungeness crab, surf perch, et cetera).
3. Bathymetry: NOAA charts, mean high tide to 200 miles out. Include shoreline topography on land, to 2 miles inland.
4. Benthic Geomorphology: Bottom features, including kinds of bottoms (rock, gravel, sand, mud), rock outcrops, reefs, canyons, sea mounts, Include major species associations that are connected to specific bottom features (e.g. Dungeness crab, rock fish, kelp).

5. Boundaries and Zones: State, counties, 3 mile, 200 mile, parks (county, state and federal), marine reserves, sanctuaries, military reserves, Tribal U&A, Tribal SMAs, Klipsan Beach regular crab season start line, private ownership, commercial shipping and towing lanes, underwater cable routes, specific dedicated USACE dredge disposal sites, marked maritime channels & federally authorized depths & widths, et cetera; and other pertinent markings that need to be preserved.
6. Existing buoys and markers: Navigation, weather, tsunami warning buoys, scientific buoys
7. Dredge disposal sites: Existing and proposed
8. Protected view sheds: Include ocean energy device visual impact areas and set aside areas
9. Biotic use areas: Fish and wildlife migration routes, including seabirds; feeding areas, essential habitats, critical habitats, and known geologic features associations
10. Known areas of poor water quality, and of freshwater inflows: These are regions where inflows of poor quality occur from rivers, or upwellings with poor quality water occur, as in the Oregon 'Dead Zone", which appears each summer along the PNW Coast.

NOTE: Compare these layers to other states' and provinces' MSP maps and see what they included that may also be important to Washington CMSP outcomes. Oregon developed a fair scenic amenities standard that Washington needs to fully consider to control industrialized landscape and support aesthetic values that all our state citizens currently enjoy.

List top ten (10) marine water condition indicators that are necessary for marine water health, environmental protection, public access, & policy decisions

1. Port Channel condition hydrographic surveys, usually USACE
2. Ocean acidity and hypoxia: pH, DO, DCO2
3. Surface and Subsurface Water Temperatures
4. Harmful Algal Blooms: algal blooms come from several directions; use selected monitoring sites, occurrence of several biotoxins
5. Primary productivity: Chlorophyll a, via satellite
6. Invasive species: Known locations in estuaries, on beaches, or in nearshore ocean
7. Fecal Coliform: presence, concentrations, occurrence frequencies
8. Presence & volume of litter, plastics, microplastics [in water, on beaches]
9. Sources for nutrients [e.g. phosphorous, nitrogen, other nutrients] and contaminants, including heavy metals, insecticides, herbicides, endocrine disruptors, mercury, PAH, POP; see comments on CRP, above
10. Locations of concentrations of lesions & other growth defects on marine species [fish, crab, et cetera]; based on landings and industry observations
11. Date of spring transition - larval recruitment that may be connected to climate change

List top threats to Coastal Communities' economic stability and viability that need to be fully considered if Existing Sustainable Uses are to be successfully Protected and Preserved for current and future generations.

1. Oil & Chemical Spills
2. Invasive species
3. Ocean Acidification and Hypoxia
4. Over Industrial Development (water quality, air quality, with nearshore water impacts)
5. Coastal erosion on beaches linked to sediment starvation associated with anthropogenic interference to sediment pathways. There are specific areas of erosion and accumulation, these should be mapped and tracked over years and a plan to address this erosion ASAP.

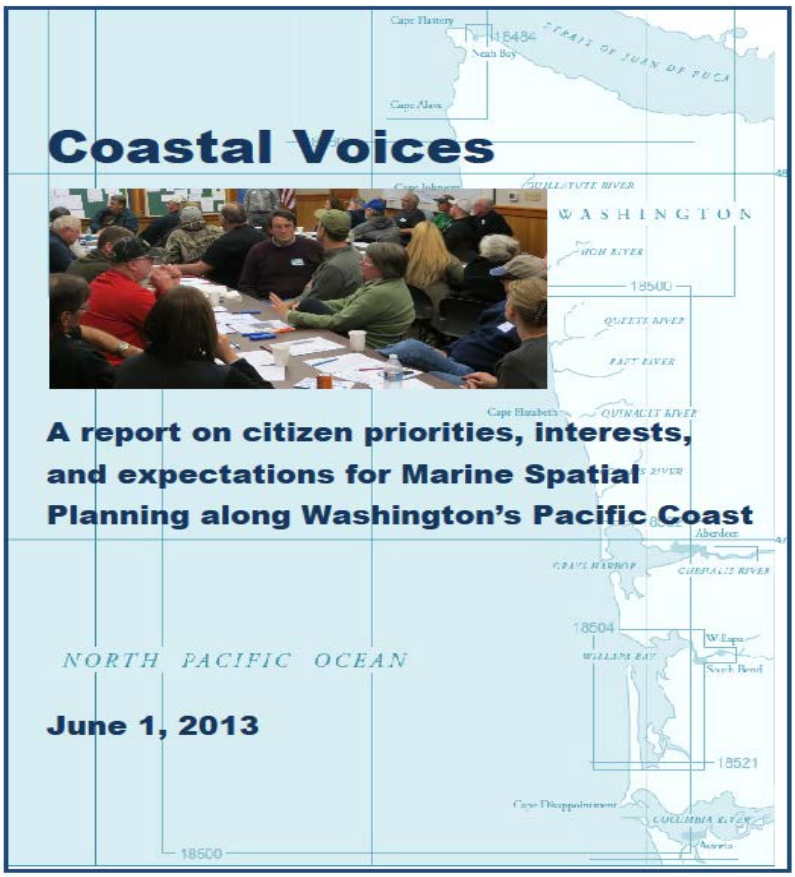
6. Insensitivities to coastal needs; external problem at state level when dealing with local coastal concerns

List of other important parameters and activities for Washington CMSP Process

1. Data decision support tools in a CMSP online program must be easy for public to use. The CMSP tool should provide clear information to support MSP decisions. The supporting data should be clear, and the decisions based on this data should be clear.
2. List Washington's Unique Features as compared to other states that have addressed CMSP: Federal tribal obligations, highest Mass weather index, sanctuary, other
3. Presume that all beaches (except privately owned) are important public access/recreation areas to be protected and preserved for all this state's citizens.
4. Any Coastal Marine Spatial Planning process that eliminates or substantially restricts or impacts any portion of an existing use MUST be reported to the appropriate legislative committees and approved by the legislature before taking effect.
5. The CMSP must identify areas inappropriate for development of new uses that impact major existing uses but not limited to fishing, commerce, navigation, shellfish aquaculture, recreation, aesthetics, and other historical Public Trust Doctrine uses and avoid those areas for development that have conflict and harm. Relevance to declaring development off limits shall incorporate historical uses, cultural or scenic value, fisheries resources, important ecosystem processes, natural features worthy of protections, critical habitats, species of concern, other considerations of special worth including impacts to human health and safety and maintain multiple public uses as priority allocation of coastal marine real estate from 0 – 200 miles offshore. These inappropriate areas can be further adjusted if unintended consequences occur as a result. These inappropriate development areas shall be encapsulated in such a manner as to become enforceable standards of the CZMA.
6. CMSP must identify appropriate levels of bonding requirements for new industrial uses that go bad or fail from lack of adequate capital or other reasons to remove failed equipment from the marine environment and should account for REAL costs associated with equivalent happenstance such as the Costa Concordia, New Carissa, Finavera single sunk buoy removal, and the cost of removal of a single anchor device of OPT and prorate that bonding requirement for the size and complexity accounting for each individual piece of equipment in any industrial development in marine waters.
7. As a result of CMSP there should be an office of advocacy developed in the Governor's office to insure equal access to justice for small businesses not just on the coast but for all small businesses across the state with a small business definition of less than $ 10 million net income per year as reported on their US income tax return.
8. Last but certainly not least the people of the coast need reasonable Coastal Marine Spatial Planning to protect their lives, safety, pursuit of happiness, an honest living, without Washington CMPS becoming another cottage industry similar to saving salmon on the Columbia dipping into the till at consumer and taxpayer expense just to create another "process" that keeps some people busy in government.

Need to incorporate the 5 public meetings sponsored by

All coastal MRC's, TNC, Surfrider facilitated by John Kliem and financed as a worthy use of the original $2.1 million Washington CMSP funding at minimal expense.



Included by reference and needs to become a significant part of Washington CMSP.

Industrial Development in Pacific Coastal Waters – does Washington need it?

SB 6350 does reference development of ocean energy in offshore waters; it does not give any significant parameters to how this could or should be done, <u>if at all</u>. Washington does not have a pressing need to lower our reliance on carbon for electrical output. Washington is already # 1 in carbon free electrical production in the nation, maybe the entire world at about 90% carbon free and will be coal free before 2025 eliminating the 10 million tons of coal currently transited through the state and burned here today. Washington also has additional undeveloped hydropower that is available for development at existing hydroelectric facilities and dams that have no hydropower. Two empty turbine bays exist at John Day Dam that could be easily added. Washington also has some of the lowest priced electric rates in the nation and ratepayers want to keep it that way as a priority. The very nature of most renewable energies will keep us from achieving full carbon independent anytime in the near future unless the consumer is willing to suffer brownouts on a regular basis as the sun does not shine 24/7, the wind does not always blow with sufficient force to drive wind turbines, and the seas are more often calm than we need to prevent service interruptions to demanding customers that have become accustomed to reliable uninterrupted electricity on demand with a flick of the switch on their wall 24/7/365. Even our neighbor Oregon is 35 – 40% dependent on coal for its electrical consumption. The average state is only 7% hydropower and 50% or more coal dependent. Washington produces a lot more electrical energy than we use already with heavy exports of both

hydropower and wind energy to California and yes even Canada. Fact is Washington produces more energy than the grid system can handle now and if we produce more anytime in the near future will need to shut down additional wind energy and still pay for ½ of what the wind turbines could have produced if they were producing energy; fraud perpetrated on the consumer by driving up the cost of our existing energy supply with nonsensical feed in tariff contracts that over stimulated supply for the existing demand; a situation that often develops when excessive subsidies are erroneously forced into any area that they are not needed to meet demand. Subsidies can always be applied if necessary at a later date when electrical demand warrants an increase in production that is not being met by existing sources or conservation measures to get the best utilization out of existing supplies. Washington needs to closely examine our supply/demand equations and adjust our expectations to our state's needs not artificially high renewable energy standards in other states that cannot produce enough in their own states to meet their unrealistic expectations at reasonable cost/benefit ratios. Washington has considerable untapped additional cheap, reliable, essentially carbon free, and storable hydropower available to us today that is a far better investment in public infrastructure than unproven, intermittent, very expensive highly speculative ocean energy which is over promising and under delivering any electricity at all let alone at a cost price point acceptable to the consumer. Washington has other alternatives that are far better options for our state than offshore energy and our Washington CMSP EIS document has a must responsibility to explore and put those better options into perspective for this states citizens in any EIS document so that a complete suite of reasonable alternatives can be put before the citizens of this state so that they will make the S.M.A.R.T. choice relative for what is best for our state's electrical investments at a cost that the consumer can afford now and in the future; the quality of life our grandchildren depends on us making the RIGHT choices for them today that includes a safe secure affordable electrical supply that is cost effective and still responsible to our environment without going bananas; the reality test of coastal marine spatial planning.

A large part of Washington offshore waters have been undergoing industry to industry coastal marine spatial planning for over 40 years where the towboat industry and the crab industry have willingly agreed to share ocean waters in a manner that is beneficial to both industries and we routinely act to the mutual benefit of all parties associated with the agreement. The towboats have a dedicated place to tow their commerce and the crab industry has a dedicated place to fish. Some areas are shared in common but not as mutually beneficial. One of the most recent changes in the agreement opened up inside lanes off the Washington coast several weeks earlier in the spring when the price of fuel increased operational expenses for the tow industry. The agreement is currently undergoing a very serious revision south of Washington. Many towlanes are being closed, the rest are being narrowed to accommodate more overall fishing area and the tow industry is receiving a dedicated towlane year around with NO closures. In over 40 years of negotiations these industries have worked diligently to share the ocean without government intervention or regulation of any kind other than some amiable facilitation by Sea Grant who has been a great host for this highly successful long term "gentlemen's agreement" to work together to solve our shared space in a realistic and beneficial manner that maintains freedom of navigation with respect for other comrades "needs" at sea and a willingness by both industries to work together so that both industries prosper; not one at the expense of the other. Washington coastal marine spatial planning needs to find a way to imbed this core value of mutual respect and cooperation into a "process" where industry to industry negotiations are where the final decisions are made regarding placement of new industrial offshore facilities are located. Industry to industry negotiations will go a long way to solving confrontations when there is a recognized need that the affected parties are actually working together to solve each other's problems and finding a way to live together without confrontation greatly reducing the legal option as a solution that we see all too often in other states by NGO's. Another more recent excellent example of industry to industry negotiations solving ocean space conflict and avoiding harm is the Oregon Fishermen's Cable Committee which solves how and where international fiber optic cables are laid and buried in the territorial sea and on the OCS. This same negotiation process identifies unburied cable and the fishermen agree not to fish in that area. If

normally buried cable is inadvertently suspect to snagging the fishermen reports his snagged position and is either told to keep fishing or cut off his gear and leave it abandoned on the cable. The agreement provides immediate compensation for gear that is cut off from a dedicated fund that is funded by the fiber optic company and everyone leaves the room satisfied that the other party has attempted to meet the needs of everyone sharing the ocean space. Another excellent example of successful coastal marine spatial planning that is not interfered with by burdensome government regulations and another of great example of cooperation between industries that should be embedded in Washington CMSP as a first option to solving contentious problems. Industry to industry negotiations reduce regulation, cost of implementing new use, and has proven durable track record with minimal legal entanglements and not once has one of these agreements ended up in a court standoff – a very important consideration moving forward with CMSP.

At this point in time there are NO current proposals for any Washington offshore development so Washington CMSP will have a difficult time simulating industry to industry negotiations but that process has to be available for the parties to engage and only if it completely fails should government intervention be brought to bear.

Mapping Existing Uses to Protect and Preserve

Essential Element of Washington CMSP – under construction

Currently is it is difficult to comment on what needs to be considered in this scoping document relative to mapping existing uses in Washington coastal marine waters and until these uses are put into the developing state mapping tool impractical to issue constructive comments. However, the coalition has requested the project results of the $2.1 million CMSP spending that were supposed to be completed by June 31, 2013 (never delivered) which included a WDFW mapping presentation of commercial and recreational fishing in coastal marine waters. BOEM also sponsored 1 use mapping exercise on the coast at Aberdeen. Ecotrust developed fishing use mapping covering the southern fishing fleets existing use. Fishing Logbook data exists for multiple fisheries that may be publically presented only in aggregate format to protect individual fishing privacy. **Mapping existing use "correctly" is the most important and fundamental CMSP baseline** that MUST be accomplished and vetted extensively by the affected uses in the very early stages of Washington CMSP to explore where any new industrial development can and cannot be placed to avoid conflict and harm to existing sustainable uses of today as required by recent Washington CMSP legislation. This vetting process will require face to face negotiations on the data by those most affected by individual mapped sectors. We herein by reference include CRCFA comments to BOEM on their Washington coastal mapping requesting a meeting with the various sectors besides more specific suggestions to improve the presentation in a manner that better reflects the individual fisheries. We also include by reference the WDFW logbooks of the crab fishery and demand that the logs be map digitized with beginning and ending latitude longitudes with a connecting line after all those participating fishermen have authorized release of the information to the public domain. Additional Ecotrust maps of the Columbia River fleet combined commercial and sport fishing maps also must be included as a specific map layer in the Washington mapping tool. The mapping tool must also reflect the coastal community economic reliance on different economic and recreational sectors to better assign where new uses may find the least damaging impact if Restricted Navigation Areas are established and ALL offshore industrial developments will have associated RNA's if they are tripoint moored.

Science as a foundation

It is essential that science plays prominently into informed decisionmaking regarding CMSP, especially important that science is allowed to explore offshore waters issues like ecosystem management are in infancy and precious little is actually well understood especially intricacies like food web dynamics associations with geologic features and geochemicalphysicalthermalelectrical dynamics – the new unexplored frontier in science. Relying on the best science currently available could potentially lead to DISASTER. Existing EMF science is such an example. Often it will be required to even devise new scientific tools of discovery and methodology that has never been explored in the past. Acquiring pre-action biologic baseline data may even require new scientific tools and approaches not yet conceived and more intensive investigations than the casual pre-dampened science of the past that all too often compared only the size of the ocean compared to the negligible size of the industrial intrusion and automatically declared a FONSI – WRONG ANALYSIS. Pre, during, and post and continual monitoring will be essential to assess impacts from new emerging industrial uses in our marine waters. Food web dynamics and the existing functional relationship to industrial intrusions may be difficult to assess and <u>require multiple attempts</u>. Continual field verification of new uses will be mandatory. **Socioeconomic impacts** will be strained and need new tools of investigation that have not been required in the past including impacts to those most vulnerable from impacts of industrialization, our <u>younger citizens will need special focus and attention</u> to their economic survival. Risk analysis of increased fatalities will be new investigative territory. Transparent ongoing interaction between the scientist and the affected communities can bring new insights into analysis and foster collaboration and trust in the findings. Funding these new areas of scientific research will out of necessity be a function of the new use obligations to any adaptive management scheme put forward to instigate a new use.

An example of an EIS process that abused science to drive a predetermined FONSI is exposed in the CRCFA response to the Integrated Feasibility Report for Channel Improvements and Environmental Impact Statement is included by reference. To be equally objective by reference we also include the most recent example of the science being developed by the Lower Columbia Solutions Group technical and scientific team at the South Jetty Site just south of the Columbia River with a verdict that is still out and suffering multiple setbacks as will happen in the majority of new emerging use injections into a harsh NE Pacific Ocean Environment. This group's scientific credit the science is being developed to determining impacts that have never been assess before and only continual pursuit through trial and error will reach any valid conclusions. Funding remains a constant struggle and those with the most to gain are resisting financing the research; USACE. Expect funding problems of new science in the future of CMSP as offshore research is time consuming and expensive to conduct. Criteria must be put in place that new use requires sufficient scientific study to ascertain the impacts to existing use and the marine environment before the action is fully expanded. All too often information is sorely lacking and needs to be developed to make informed decisions about the potential impacts. This information often can only be obtained through adaptive management that requires a precautionary approach to incremental development in a phased approach that demands scientifically sound analysis before committing to a full blown new development. New science takes time to develop and review.

An existing example of Washington CMSP "Protect and Preserve Existing Sustainable Use and integrating a new use into marine waters is the adoption of nearshore USACE dredge disposal in less than 60 feet of

water as opposed to Deepwater Disposal. Enhanced dumping is real CMSP in action which illustrates some of the trials associated with new use, the setbacks, and advances in science and financing that science through realistic scientific practices over reasonable time frames to reach valid results is proving a significant challenge, cost, and time investment. The Corps is resisting doing the funding for the necessary science to further this new intrusion into areas of the sea not impacted by prior disposal and is pressing the issue hard enough that it is becoming difficult to finish the job of assessing impacts to natural resources and associated uses. Many collaborating groups from local, state, and national are helping with funds and in kind resources to make these new use areas become viable through scientific research that is searching for answers to two basic questions: How high it too high for mound induced wave amplification to stay within the basic 10% mound induced wave amplification limit and how thin is thin enough disposal that crab survive nearshore disposal and survive to enter the crab fishery. The Corps stands to benefit substantially from this nearshore disposal in reduced travel time which translates into shorting the dredge time by up to two weeks per year at a dredging cost of $125,000.00 per day. With these savings, if the assessment is positive to avoiding resource damages (preliminary scientific results indicate that may be the case, but not yet conclusive) the Corps could easily fund the required $200,000/year in added research, have enough savings to dredge the associated side channels at Ilwaco, Chinook, Quileute, & Skipanon and still reduce the overall costs of dredging the MCR compared to existing activity associated with offshore disposal at the Deepwater Dredge Disposal Site. This project is a beneficial win for not only the Corps budget but the coastal communities' economic well-being if the crab can survive and enter the fishery. This project embodies the real hard and soul of what Washington CMSP should be all about. In addition, if the nearshore dumping can actually add sand to the coastal shorelines every citizen in the state will participate in saving coastal beaches from continual erosion and help maintain a Cape Disappointment State Park which a lot of people utilize from all over the state and nation. CMSP does not get any better than this if successful. Washington CMSP must incorporate this type of existing and developing socioeconomic and scientific material into the realities of actually solving problems not just ivory tower wanderings and paper exercises for Washington CMSP. Real and practical solutions that further Protect and Preserve Existing Sustainable Uses including modifications that enhance coastal communities like this dredge material handling change from ordinary belly dumping as fast as possible to enhanced dumping that has the potential to improve natural resource survival, and reduce sediment handling costs in the process is the exciting and beneficial realities that Washington CMSP can and must embrace rather that chasing hypothetical expensive prone to failure new emerging uses of the marine environment that are not yet mature enough to become realities anytime in the near future. The dredge is an essential piece of existing use that must be addressed and it can be in Washington CMSP with beneficial outcomes for current and future generations that benefit all Washington citizens from Westport to Walla Walla and beyond clear to North Dakota oil fields and Iowa grain farmers that ship products to domestic and foreign markets driving local, state, national, and international commerce. Enhanced dumping is already being considered at Coos Bay where excessive mound induced wave amplification is occurring. It could also be utilized at Westport as well as the channel is deepened to Aberdeen. In the process of this overall exuberance it must also be recognized that direct beach placement is the only realistic solution to get the best use out of sediments already in the dredge. Halfmoon Bay at the base of the south jetty at Westport needs to tell us something, direct beach placement has and will continue to be the only viable and acceptable solution that really

targets erosion directly in a manner necessary to curb erosion and remove direct impacts of the sea that honestly protects coastal infrastructure. Soft solutions are preferred to hard armoring.

In practical terms, Washington coastal and marine spatial planning provides a public policy process for society to determine how best to Protect and Preserve Existing Sustainable Coastal Uses, the ocean, our coasts, and estuaries are sustainably used and protected for current and future generations while growth of new emerging uses does not degrade public access or use by providing a conditional path to YES as well as an equally clear path to NO for emerging use. Washington citizens in the past set a tremendous precedent by establishing the Olympic National Marine Sanctuary to limit energy production without restricting existing uses like fishing and basic navigation preserving public access to marine waters as a very high priority for all Washington citizens now and into the future.

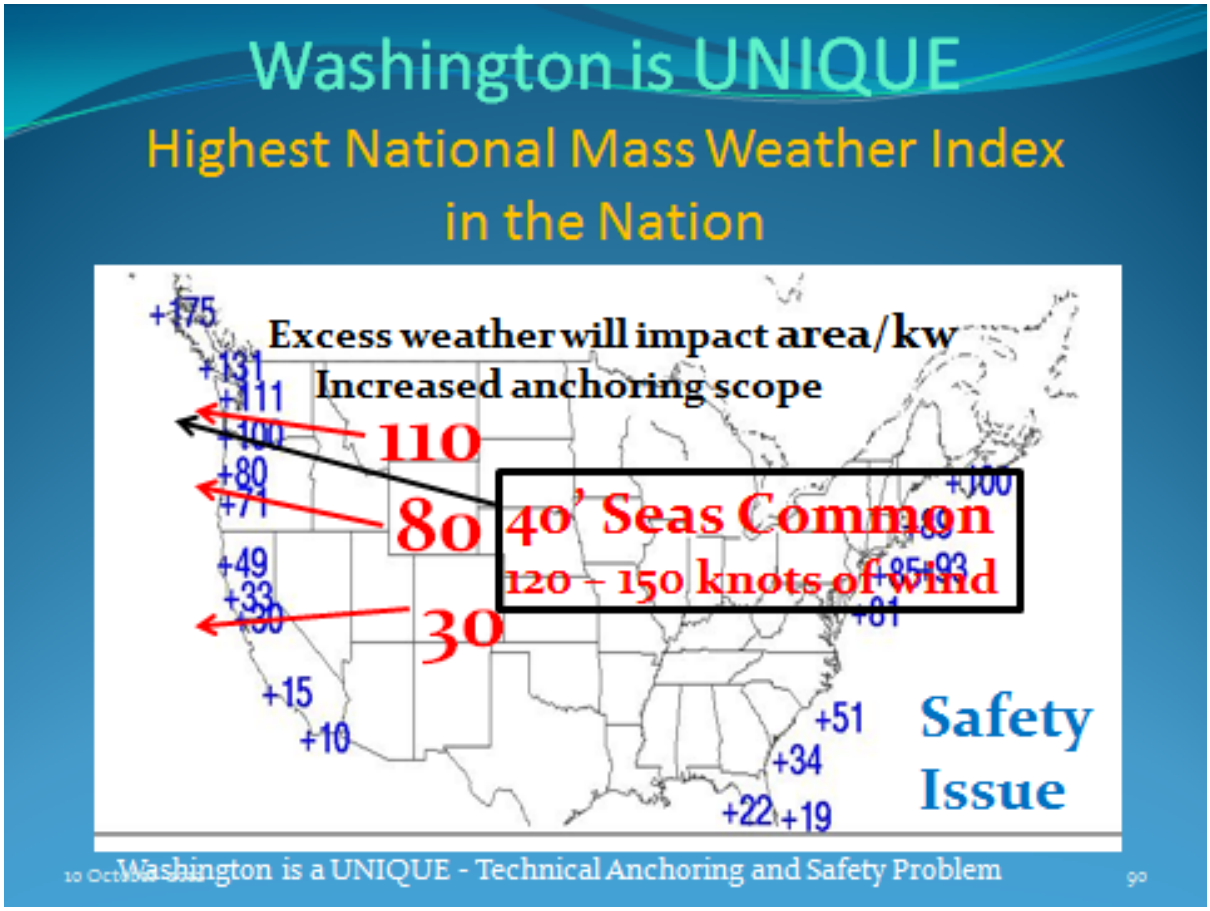
Voluntary actions always produce superior results to coerced approaches,

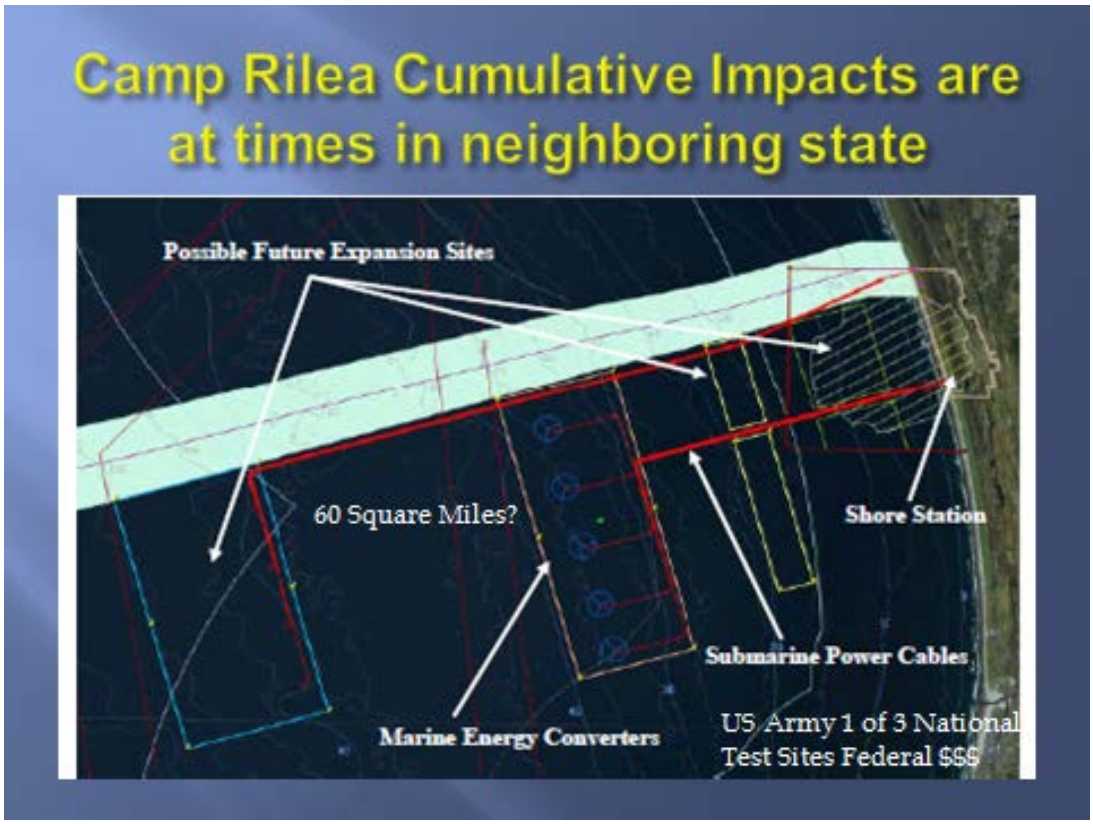
Respectfully submitted, Dale Beasley, President Coalition of Coastal Fisheries

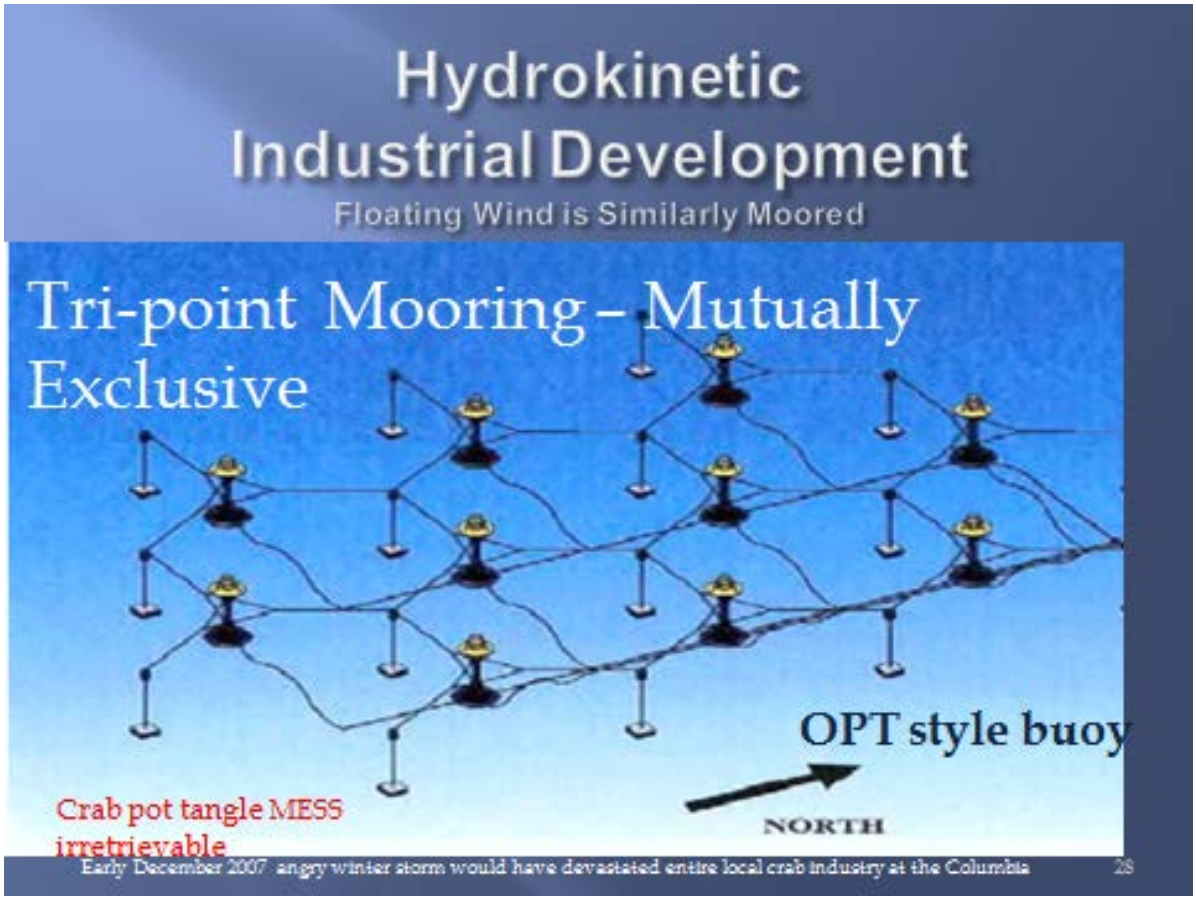
Please submit correspondence and notifications to interested and participating parties:

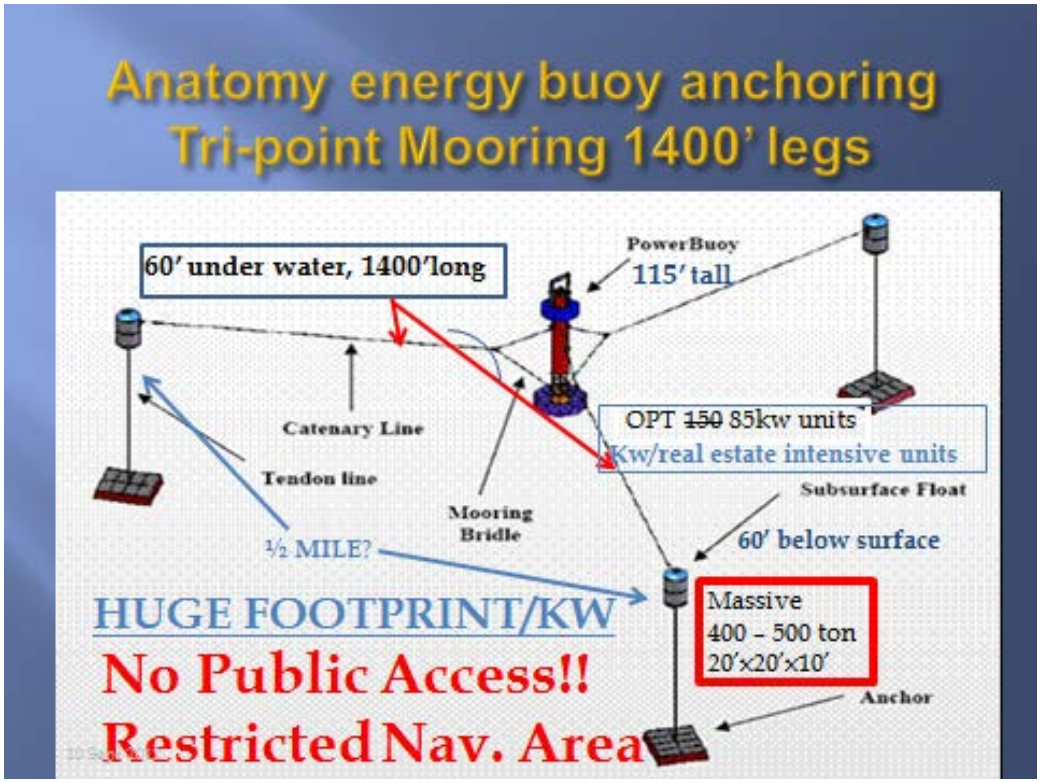
Dale Beasley
Coalition of Coastal Fisheries
Columbia River Crab Fisherman's Association
PO Box 461
Ilwaco, WA 98624
360-642-3942
crabby@willapabay.org preferred correspondence

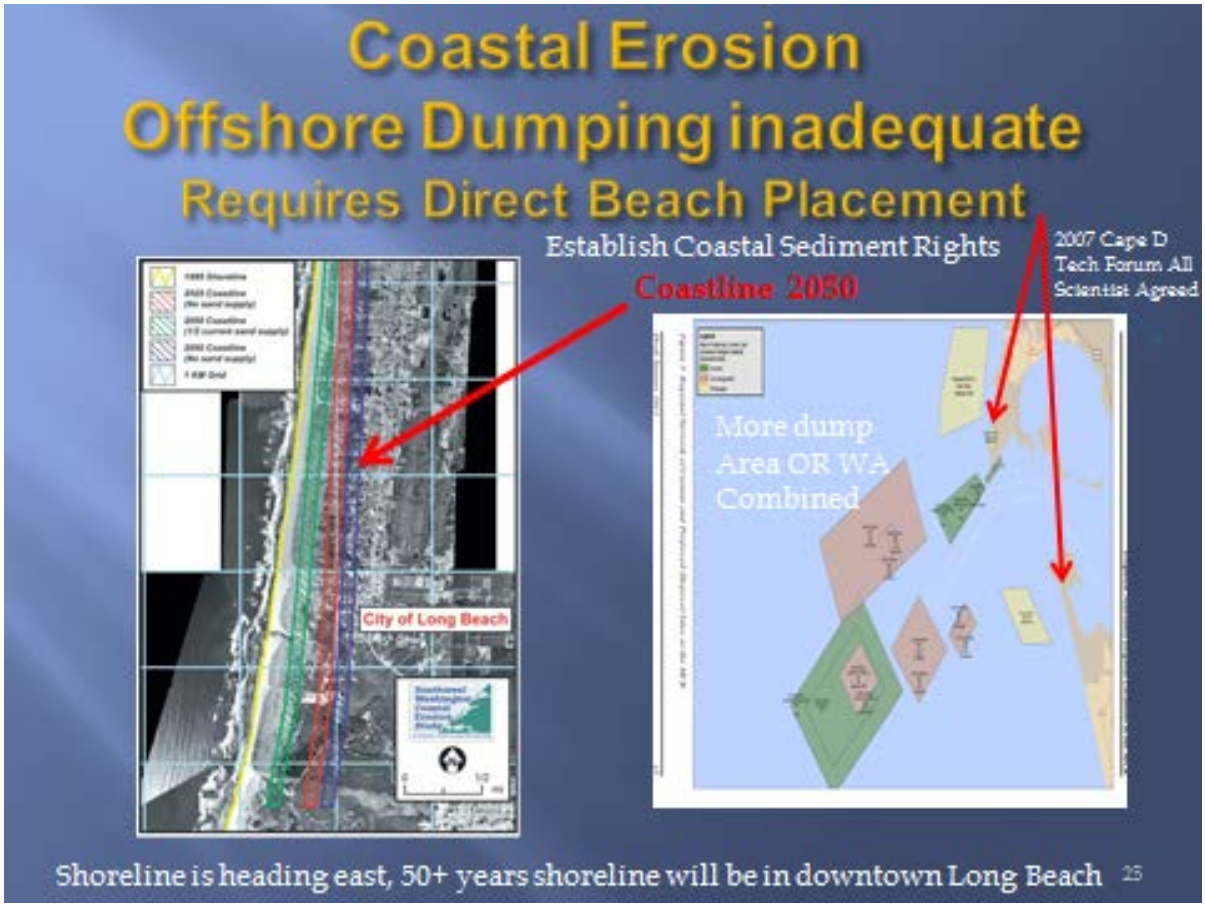
Appendix – attached - Pictures worth a 1000's of words & easier to get a mental picture more rapidly


Washington is UNIQUE
Highest National Mass Weather Index in the Nation
Excess weather will impact area/kw
Increased anchoring scope
110
80
30
40' Seas Common
120 – 150 knots of wind
Safety Issue
Washington is a UNIQUE - Technical Anchoring and Safety Problem


Camp Rilea Cumulative Impacts are at times in neighboring state
Possible Future Expansion Sites
60 Square Miles?
Shore Station
Submarine Power Cables
Marine Energy Converters
US Army 1 of 3 National Test Sites Federal $$$

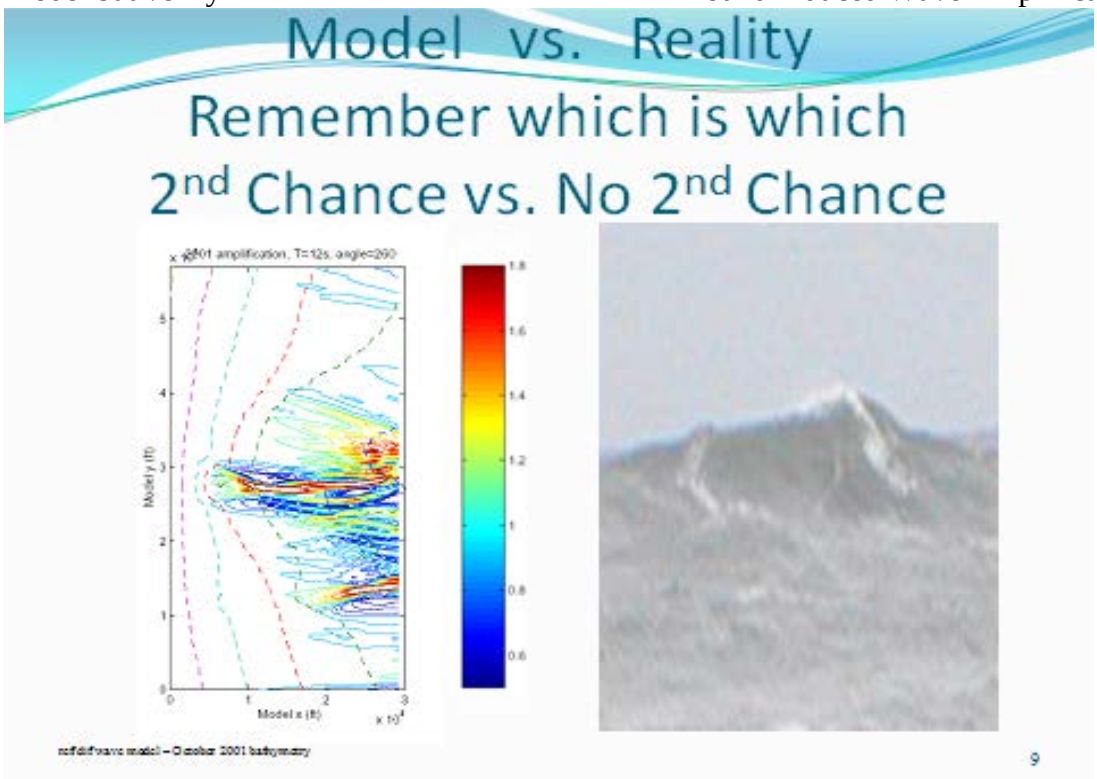

Hydrokinetic
Industrial Development
Floating Wind is Similarly Moored
Tri-point Mooring – Mutually Exclusive
OPT style buoy
NORTH
Crab pot tangle MESS irretrievable
Early December 2007 angry winter storm would have devastated entire local crab industry at the Columbia
28


Anatomy energy buoy anchoring
Tri-point Mooring 1400' legs
60' under water, 1400'long
PowerBuoy
115' tall
Catenary Line
Tendon line
Mooring Bridle
OPT ~~150~~ 85kw units
Kw/real estate intensive units
Subsurface Float
60' below surface
½ MILE?
HUGE FOOTPRINT/KW
No Public Access!!
Restricted Nav. Area
Massive
400 – 500 ton
20'x20'x10'
Anchor



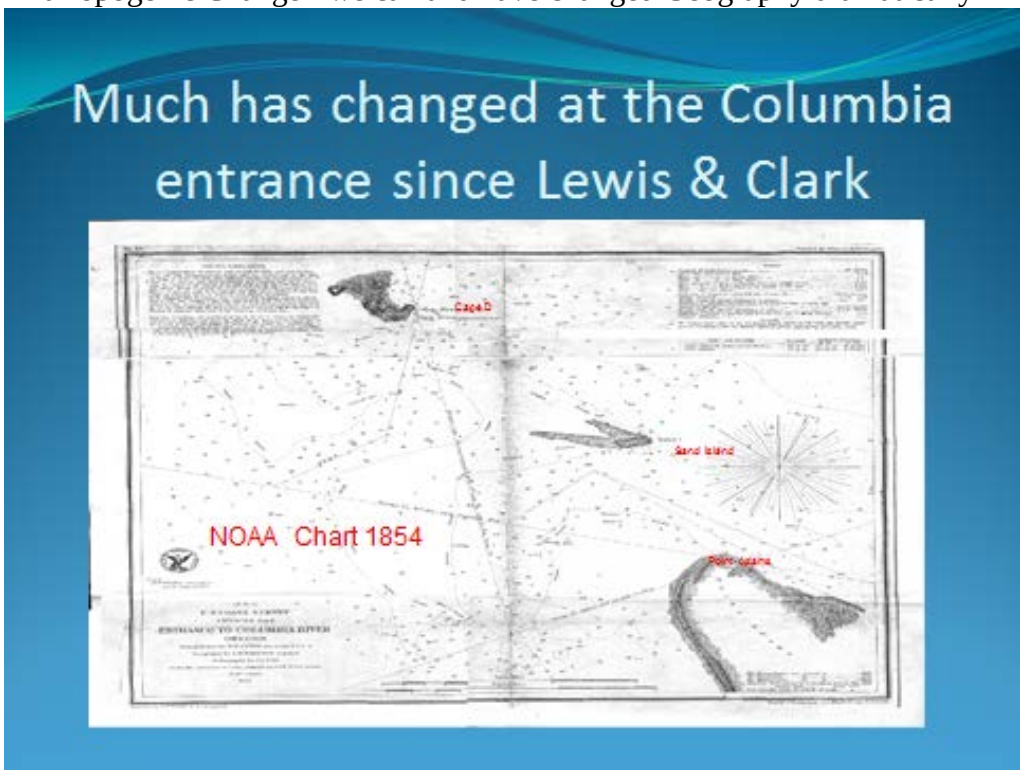
Model but verify

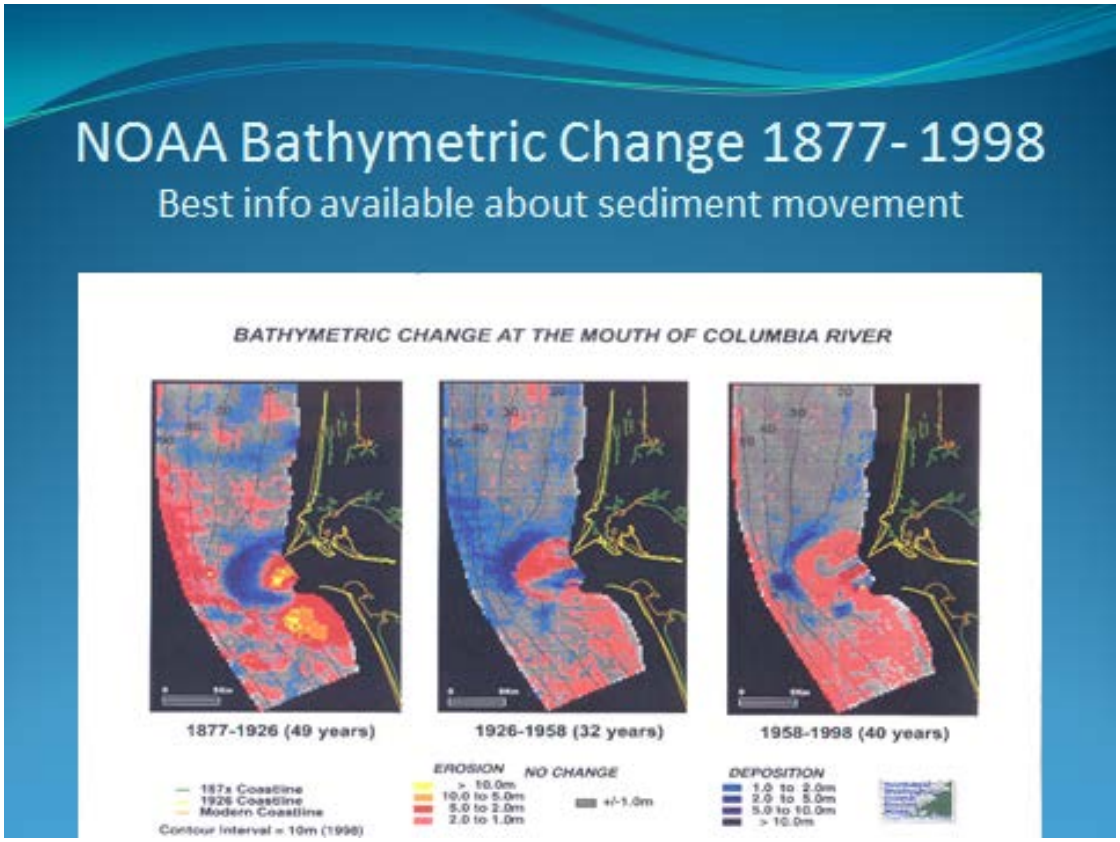
Mound Induced Wave Amplification



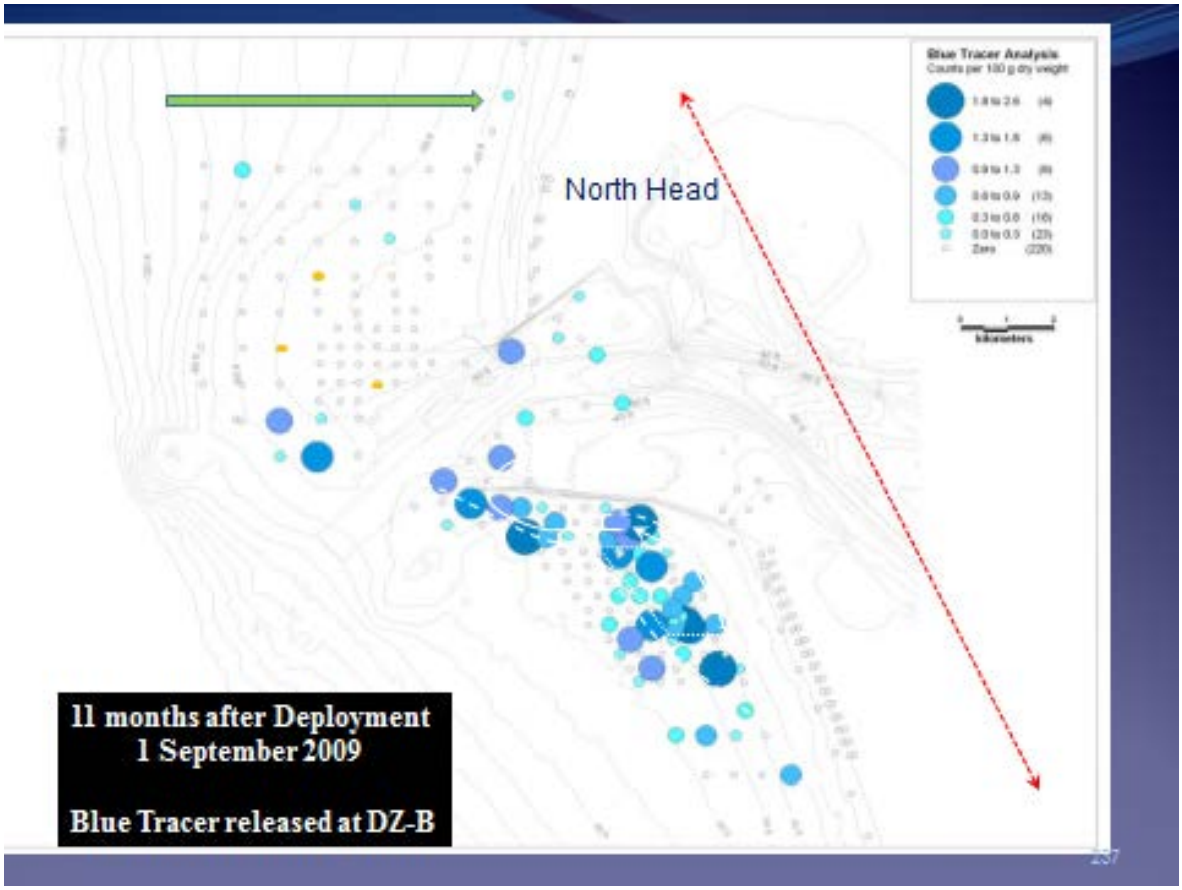
Paper exercises vs. reality are often two completely different results; reality can be fatal

Anthropogenic Change - we can and have changed Geography dramatically



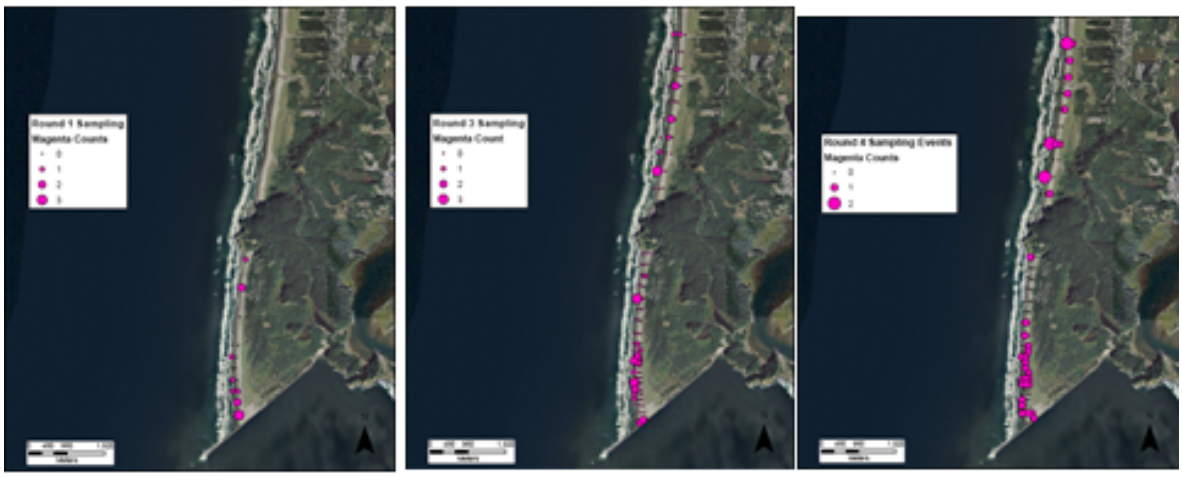


The realize change decades are often required where ocean and geologic events interact



Sediment Tracers Studies superior results to old way of tracking dangerous disposal mounds

Benson Beach Sampling Results to February 2011



Oct. 6, 2010 Dec. 2-4, 2010 Feb. 1-2, 2011

238

The new face of Coastal Marine Spatial Planning – result of a decade of collaboration between Federal, State, Local, University, Stakeholder & Citizens to find Beneficial Uses of dredge spoils acting as a unit
Lower Columbia Solutions Group Technical Team is on cutting edge of new use impact study design
CamPod, unique study tool that turned conventional science upside down in 2 days
Multiple setbacks, last year interagency $$ transfer, this year the dredge literally hit a rock
Lost critical study time to ascertain impacts at critical molt stage of crab
Acquiring new science to solve problems through adaptive management using precautionary approach

Marine science often involves NEW tools & techniques not yet discovered
Trial and error is expensive but necessary for uncovering ocean realities

1. Benthic video sled
Purpose: To record macroinvertebrate densities at control and impact sites

Status: Acquired and assembled components
-Limited field tests

2. CamPod
Purpose: To measure acute effects of disposal Incl. sediment depth & Impact on fauna.

Status: Developed system
-Deployed during 2 events
-Upgrades imminent

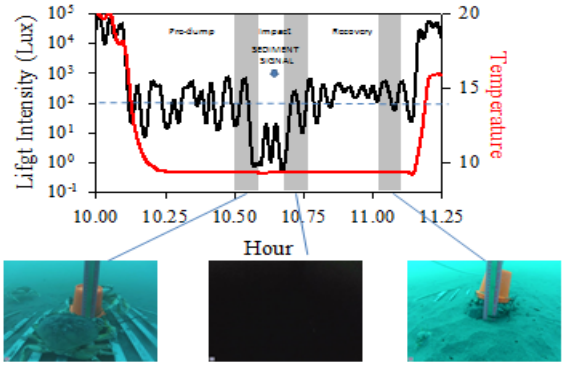
3. Acoustic Tracking
Purpose: measure long term/chronic impacts on crabs

Status: Acquired nodes & most tags

2

Sediment Deposition depths were a surprise; 10 – 20% of expectations, lower right photo

2012 CamPod results



FISH00HEAD on youtube

9

Out of the box thinking equals results
This is what can happen when people work together for everyone's benefit instead of fighting over turf
Lesson Learned

BOEM Washington Ocean Use Mapping Project

1) **These comments are made in an attempt to focus new emerging uses to areas off Washington that avoids disruption and harm to existing uses that individual coastal communities rely upon for their economic survival and viability without causing harm to those communities but adding overall value to localized economies without damages <u>if that can be done</u>.** Ocean use mapping must be about finding the place(s) that are least disruptive to the coast. The Columbia River Crab Fisherman's Association makes these suggestions to better differentiate and map existing uses that contribute significantly to the coastal economy that need protection and attempt to find a place to locate new use.

2) **Ocean Dumping**, Dredge Spoils
    a. Page 14a – 14d There is NO general dredge ocean dumping allowed, there are specific legal Dredge Disposal Site dump areas that need to be reviewed and placed specifically on the maps in latitude longitude – there is NO general use dredge disposal
    b. Check and get specific disposal site information from the USACE; Portland and Seattle
    c. Other ocean dumping needs to be listed as a MARPOL convention & mapped separately
    d. Ocean Dredge Disposal Sites are essential to keeping commerce moving to our ports large and small and need to be mapped to help delineate any new use away from these sites

3) Fishing areas need to be more specific & by specific gear type; lumping all commercial fishing into one category is not the right way to map these fisheries or delineate what needs to be protected.
    a. Example: Dungeness crab is over 50% of all commercial landings value on the coast – there is NO way to determine that Dungeness crab is even important to the coastal economy from these maps let alone the DOMINENT contributor to coastal county economies.
    b. The Sum of all dominant uses map has dog walking on Beach 3 as equal contributor to all of commercial fishing combined on the coast thus stripping fishing of much all of its needed protections and trivializing dominant economic contributors to localized economies on the coast or any method to tell what cumulative impacts have already occurred concentrating offshore fishing effort already. In 1994 Federal Judge Rafeedie re-interpreted the 1850's Stevens Treaties causing very considerable effort shift in the crab fishery from north of Westport to south resulting from a 50/50 sharing of the crab resource and a cumulative dollar loss to the state crab fleet of over $120 million and growing at $10 – 12 million/year . Historically the crab catch was split 50/50 between the state fishing fleet north and south of Westport with zero tribal harvest. After Rafeedie, tribal fishers acquiring 50% of the crab north of Westport, effort shifted where today 70% of the remaining crab available are caught south of Westport on the

southern Washington coast with a very DRAMTIC shift to the very southern 13 miles of coast south of Klipsan Beach where 40 – 50% of the crab fleet is now fishing in only 9% of the 140 mile long coast. Nowhere in this mapping exercise is that DOMINANT use area defined as extremely valuable use area on any map in this collection of use maps and is a very, very serious omission that will have a profound and lasting impact on the future of the coast. The area south of Klipsan Beach needs to be an area of ocean that is too heavily fished to become a new emerging industrial development area and this distinction needs to be prominently on the maps.

Other Examples that need delineation on these use maps

c. Example – Trawling, RCA's, None inside 3 miles in Washington state waters, other - needs delineation as this may be a limiting factor to ocean industrial facilities
d. Example – Salmon trolling, WA permit required, OR permit only good from 46 15 to 46 28? (Klipsan Beach) - needs delineation as this may be a limiting factor to ocean industrial facilities (Second use restricted to south of Klipsan Beach area)
e. Example – Tuna Out to 200 miles and beyond 10 miles
f. Crab – Dominant use inside 100 fathoms, some out to 200, none outside 200 – Crab represents 50% or more of all the landed value or all other commercial species in Washington and needs to be specifically mapped - needs delineation as this may be a limiting factor to ocean industrial facilities
g. The Klipsan Beach early regular December 1st season Dungeness crab line is not on the map and in 2010 over 50% of the entire Washington crab fleet fished in just 13 miles of the south coast of Washington and has concentrated over 40% of the vessels in 9% of the 140 mile long coast – VERY IMPORTANT to get on the map in a meaningful manner
h. There are at least 2 Klipsan Beach fishery concentration lines that are not on these maps
i. Whiting – needs delineation as this may be a limiting factor to offshore wind turbine placement
j. Black Cod via methods other than trawl can be fished in the RCA & needs to be mapped in a manner so that holes for offshore industrial development can be found.
k. Sardines – needs delineation as this may be a limiting factor to offshore wind turbine placement (This year 65% of entire west coast quota taken off Washington)
l. Other, Black cod, Halibut, Prawns, Shrimp
m. Large Ship, Tug & Barge traffic Page 21d needs to be modified; especially do not believe the area from 0 – offshore to 6 or more is ever used by large ships or barges let alone as dominant use area; no use in south Willapa Bay or Baker Bay, other anomalies needs to be cleaned up
n. In reviewing all this Washington map information it is impossible to tell how that his information is valuable to determining where ocean energy or any other new use in the coastal marine waters could be placed without conflict or harm to segments of the

coast; there is NO way to tell how much the sum of dominant uses contributes to a subarea economy. Example: 38% of the earned income in Pacific County is connected directly to marine waters according to a University of Washington economic study in 2013 the highest reliance on marine waters of any county on the coast of Washington – these use maps would lead to placing Pacific County as the least used area on the coast and not an accurate picture of the reality of use reliance on marine waters if the overall goal of this mapping exercise is to actually avoid conflict with existing sustainable uses while looking for a hole in the use patterns to place new emerging uses in marine waters off the coast of Washington.

o. My suggestion would be to have a day in October to present and review these maps to multiple areas on the coast to review and get an open public forum to attend. The MRC's on the coast could possibly organize and host these meetings. I would suggest afternoons and try and dodge hunting seasons to increase attendance if possible.

p. The goals of these maps MUST be to Protect and Preserve Existing Sustainable Uses and allow new use into the ocean without conflict or harm to those existing uses. **Just making a bunch of categories of different uses does not delineate importance to a local economy**. Just because kayak fishing or something similar is listed as a dominant use in an area does not make it a huge economic contributor to coastal economies. **These maps to be honestly useful need to capture the economic reliance of an area to the different uses in marine waters and delineate those dominant economic contributors to the coast for PROTECTION AND MINIMIZE DISRUPTION.**

q. Further there needs to be a picture drawn that FOCUSES the areas, if any at all, where new use may be best fitted into any particular Washington offshore area with the least impact to existing uses.

r. Example it should be made clear that BOEM will not make any energy uses in the Olympic Marine National Sanctuary and how much of the coast that this area actually consumes. NO energy leases.

s. The area south of Klipsan Beach on the south coast of Washington is an extremely important area to local coastal economy overall and there is no honest way of determining that from these maps. MUST have a Klipsan Line on the chart placed that actually captures the importance of the southern area.

t. These maps also need latitude longitudes on them as most mariners can relate more readily where a use is occurring, a minimum of 100 fathom curve would also be a USEFUL and meaningful to individuals positioning or orientation as well to where uses are occurring

4) These charts, especially the Sum of All Dominant Uses 1a would be much more useful for identifying potential cumulative uses if the Oregon side of the chart was completely filled out as on that portion of the map are multiple new emerging uses just coming into being – new dredge site, new ocean energy site, new marine reserve, new closed trawling areas the SUM of which impacts the interstate fleet that fishes out of the Columbia River as cumulative impacts to

existing uses are not limited by a state boundary but is the SUM of impacts associated with a port's usual and accustomed by-state operating area. We have noticed that states seem to isolate there states in terms of analysis and ignore very important cumulative impacts to border communities that by in large do not recognize state boundaries in their use patterns over time and space – Fish have tails or legs and where the fish are at any particular time is where the largest concentration of existing use end up concentrating which varies over space and time, year to year.

5) In Washington this new use ocean zoning is not about spreading pain along the coast by forcing new use into just any specified area , it is about minimizing disruptions and complimenting existing economies <u>if that is at all possible</u> without deteriorating the quality of existing uses or putting them out of business. Ocean use mapping must be about finding the place(s) that are least disruptive to the coast

Washington Ocean Policy Management Goals and Objectives for Coastal Marine Spatial Planning

1st and Foremost - Focus, Direction, and Accountability to:

Protect People, Jobs, Safety, Quality of Life, and Stewardship of Coastal Marine Environment

MUST be pragmatic where issues of concern are identified and addressed open, transparent, meaningful, timely manner. Stakeholders and the public are "significant and fundamental" to coastal marine water solutions from the bottom up that promotes inclusive collaboration at a single point of contact – **Washington Coastal Marine Advisory Council** as Washington Legislature intended through 5603 which is noticeably deficient in the summery of the scoping document. The scoping SEPA document alludes to criteria (?) – Existing local, state, federal law as well as recent state CMSP legislation 6350, 6263, 5603.

Coastal Marine Spatial Planning Goals and Objectives, SEPA and NEPA Documents MUST:

1) Connect marine management decisions directly to beneficial economic and social impacts on **sustaining coastal communities**, coastal natural resource JOB base and recreation, public safety, environmental consequences, aesthetics, and enhance quality of life for the people of the coast, state, and nation; attain positive cost benefit ratio.
2) **"Protect, Preserve, and Grow Existing Sustainable Uses" must be initiated as the MAJOR goal of Washington CMSP.** Use is a broad term that includes coastal marine water dependent JOBS.
    a. Commerce, Fishing, Processing, Shellfish Aquaculture, Recreation, Tourism and related support industries
    b. Environmental and Ecosystem Function that maintains marine goods and services for use
    c. Identify and ameliorate THREATS to existing uses
        i. Oil and other chemical Spill Prevention as cleanup is near impossible in the Northwest
        ii. Invasive species control – Japonica, Ghost Shrimp, Other
        iii. Learning to live with and provide solutions to ocean acidification, climate change, sea level rise
        iv. Coastal shoreline erosion control –including direct beach placement of dredge material
    d. Encompass and protect use of the full EEZ out to 200 miles; commercial fishing, commerce, other
    e. Provide a full accounting and accurate mapping of all marine based JOBS by category review at 7 years
    f. CMSP – Do it 'WITH' the coast not 'TO' the coast
3) Return salmon utilization back to the public use.
4) Maintain OPEN Public Access to marine waters including **channel maintenance & ports as prime economic drivers**.
5) Support Coastal Shoreline Master Program updates
6) Insure that **new emerging uses** MUST supplement existing uses not replace or deteriorate them.
    a. Protect the ratepayers low electric rates and taxpayer from excessive taxes, debt, mortgage guarantees, and over production which leads to instability (why should anyone pay to have wind turbines idle)
    b. Apply precautionary principles including incremental development of new use through no conflict no harm
    c. Peer reviewed scientific monitoring with each small incremental advancement
    d. **New use cap** total area of no more than 2% outside the Olympic National Marine Sanctuary and inside 400 fathoms, not to exceed 1% inside 100 fathoms
    e. Must be ocean real estate efficient; area/Kw will be extremely important to saving existing uses.
7) Provide citizens and public officials easily usable, comprehensible, and accessible data tools, data analysis, mapping, project merit, and lead to well informed, science base decisionmaking that furthers the primary goals of Washington CMSP that embrace the Shoreline Master Programs and CZM consistency.
8) Marine Indicators must be directly relevant to achieving "Washington CMSP Goals and Objectives
9) Washington also needs to develop a "lessons Learned" document from other states and international CMSP's & renewables cost to the public.

Washington coastal values have historically preserved marine environments while maintaining existing JOBS even in the National Olympic Marine Sanctuary.

Signed_____date_____

Address_____city_____State_____Zip _____

Phone_____ E-mail _____

Group or Affiliation: _____

Additional comments on back -

From:	Diane Jones
To:	ECY RE MSP Comments
Subject:	Re: comments
Date:	Wednesday, September 25, 2013 7:44:57 PM
Attachments:	msp comment card.doc

Thank you,
Diane Jones
On Sep 25, 2013, at 10:03 AM, ECY RE MSP Comments wrote:

> Dear Ms. Jones,
>
> Unfortunately, we are unable to open the document you attached to your email. Since you sent your comments in before the comment deadline, we are willing to accept your comments in a different format.
>
> Some options for resending your comments include:
> *Copying the text of your comments directly into an email.
> *Faxing a copy of your letter to 360-407-7162.
> *Scanning your comments into an Adobe PDF format and attaching to an email.
>
> Please respond to this email or call 360-407-6595 if you have any questions.
>
>
> -----Original Message-----
> From: Diane Jones [mailto:dianejns769@gmail.com]
> Sent: Saturday, September 21, 2013 7:28 AM
> To: ECY RE MSP Comments
> Subject: comments
>
>
>
> Diane Jones
> 360-379-9193
> dianej6@q.com

Pacific Coast Marine Spatial Plan

SEPA Environmental Impact Statement Scoping

Public Comment Form

Please submit by September 23, 2013 to mspcomments@ecy.wa.gov

Description of proposal

> Develop a Marine Spatial Plan for Washington's Pacific Coast to address increasing pressures on the resources in this area, conflicts among uses, and proposed new uses (RCW 43.372).

Prior to preparing and submitting comments, we strongly encourage those commenting to review the public scoping document at: http://www.msp.wa.gov/news

1. **Purpose of and need for a Marine Spatial Plan**, including comments on the draft goals and objectives, and rationale for any suggested changes based on the criteria. What changes should be made to the goals and objectives and why?

2. **Geographic scope, or boundary, of the plan's study area** and rationale for particular boundary based on the criteria. What should the study area for the plan be and why?

   400 fathoms
   700 fathoms
   Other:

3. **Potential marine waters activities to address in the plan.** Should the plan address potential activities other than renewable energy? If so, which other activities should be addressed? No. The purpose was for renewable energy, not to open up a can of worms. This is the beginning of privatizing a commons that has so far been protected from such for the most part. If aquaculture were permitted, for example, it would be done in a world free trade system with the need to compete globally can mean pressure for lax environmental protections. Global competition doesn't not allow regionally appropriate regulatory structures or local considerations like protecting healthy traditional fisheries that currently exist. Most everywhere finfish aquaculture has expanded, native salmon

populations have greatly suffered. And if an energy project is identified, a small test project should first be proposed and developed to look for negative unforeseen impacts. Building a large project from the get go means almost no turning back once begun with potential irreversible harm. Go slow, start small.

4. **Specific metrics for draft objectives.** What does the language in the draft objectives mean to you? How would you measure progress toward the objectives? I hope that those concerned about protecting our natural resources from harm and protecting traditional users understand the "consistency clause" gives local communities power to protect themselves and their resources. It is important to understand that by using this clause intelligently, federal policy CANNOT preempt local policy. Check it out. Draft Theme Goal 5 makes me nervous.

5. **Scope of program-level environmental studies or other studies to conduct.** What type of environmental impacts should be included in the scope of environmental review and why? Which elements of the built and natural environment should be analyzed?

6. **Substantial issues and concerns that should be addressed in the Marine Spatial Plan and draft EIS.**

7. **Potential impacts** (beneficial, adverse, direct, indirect, and/or cumulative) and **mitigation measures**.

Written comments will be accepted until **5 pm, September 23, 2013**.

Email electronic comments to: MSPComments@ecy.wa.gov
Send written comments to: Dept. of Ecology, SEA Program, PO Box 47600, Olympia, WA 98504-7600

From: Hart, George A CIV Navy Region NW, N40
To: ECY RE MSP Comments
Subject: comments on MSP
Date: Tuesday, August 13, 2013 8:38:26 AM

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1) draft Objective 2: remove "high" from quality of life--because in draft objective 5 we want to improve quality of life.

2) The 400 and 700 fathom recommendation is to far offshore. At 40 to 60 miles offshore and all of the current projects are or will be located at no further than 25 miles offshore I see no justification to go 40 to 60 miles offshore. Based on the information provided and personal knowledge, the boundary offshore request is to far beyond supporting data and information

V/R
George

George Hart, Fleet Support Lead/Biologist
Commander, Navy Region Northwest
1100 Hunley Road, Room 205
Silverdale, WA 98315-1100
Wk: 360-315-5103
Cell: 360-710-0529

Board of Commissioners
JEFFERSON COUNTY WASHINGTON

1820 Jefferson Street
PO Box 1220
Port Townsend, WA 98368

Phil Johnson, District 1 David W. Sullivan, District 2 John Austin, District 3

September 23, 2013

TO: Washington Department of Ecology
FROM: Jefferson County Board of Commissioners
RE: Scoping Document for a Marine Spatial Plan on Washington's Pacific Coast

We are pleased to comment on the Scoping Document for a non-project EIS to develop a Marine Spatial Plan (MSP) for Washington's Pacific Coast.

Western Jefferson County is the home to Olympic National Park, the Olympic Coast National Marine Sanctuary, USFWS Quillayute Needles National Wildlife Refuge, tribal reservations and Usual & Accustomed areas, as well as forest products, fisheries, recreation and tourism related businesses, the Olympic Corrections Center, rural communities and family homesteads. Jefferson County's Pacific Coast accounts for roughly half of the wild coastline along the western margin of the Olympic Peninsula – considered the longest stretch of undeveloped coastline in the lower 48 states.

According to a recent analysis by the UW, 26% of the county's total employment is in marine-resource related private industries. While Jefferson County borders three marine environments, the Puget Sound and Strait of Juan de Fuca as well as the Pacific Ocean, we recognize that virtually all of our marine resources and marine-based economies have important ties to the Pacific. Consequently, the spatial and temporal distribution of human activities along our west coast has broad implications for our prosperity, our identity and our future.

We look forward to a Marine Spatial Plan that promotes compatible economic uses, but not at the expense of the natural biodiversity and productivity of our coastal waters, the character and beauty of the land- and seascape, the rural culture and traditions of our communities, or the quality of the air, water or human health and wellbeing. The national park, sanctuary and federal and state wildlife preserves along the coast are essential to this effort. Not only should their geography be perpetuated, but also their purpose and context within a larger functioning ecosystem. These areas should be linked together with new marine protected areas which allow for continuation of existing sustainable fisheries.

In addition, we have the following recommendations for the MSP and comments on the scoping document:

- Due to the fact that NOAA's Draft Aquaculture Policy (Feb. 2011) states that "nutrient and chemical wastes, water use demands, aquatic animal diseases and invasive species, effects on protected and sensitive marine areas, potential competition and genetic effects on wild species, effect on endangered or protected species, effects on habitat for other species, and use of forage fish for aquaculture feeds" are all risks related to Atlantic Salmon Fish Farms; and

Phone (360) 385-9100 Fax (360) 385-9382 jeffbocc@co.jefferson.wa.us

because WAC 173-26-201 (2)(f) states that SMP's "be designed to achieve overall improvements to ecological functions over time when compared to the status upon adoption;" and WAC 173-26-201 (3)(f)(111)(c) states that shoreline ecological functions in marine waters include "removing excessive nutrients and toxic compounds"; and WAC 173-26-020 defines "water dependent use" as a use or a portion of a use which cannot exist in a location that is not adjacent to the water and which is dependent on the water by reason of the intrinsic nature of its operation; and because upland tank fish farms with properly treated wastewater equipment can exist in locations not within or adjacent to the water and therefore satisfies WAC 173-26-020, we feel that finfish aquaculture should be excluded from the coast except in cases of temporary holding pens to support returning runs of native fish.

- The MSP should include mechanisms for preventing cumulative impacts on marine resources and identifying and addressing those that do arise. Shipping is of particular concern with respect to cumulative impacts as the number and size of ships increases.

- In #3 on page 10 of the scoping document we would add that there is a "greater likelihood of effects to Washington's resources" *3) in areas affected by electromagnetic radiation (EMR) from electricity generation or conveyance.* Fish are extremely sensitive to electric current and there may be deleterious effects on fish migration from EMR.

Our specific comments on the draft goal, theme goals and objectives and MSP boundary are listed below with proposed changes indicated in blue:

Draft Overarching Goal: To ensure *no net loss of ecological function to the* marine ecosystem on Washington's coast *while supporting* sustainable *and diverse* economic, recreational, and cultural opportunities for coastal communities, visitors and future generations and *a system of wildlife and habitat protection areas and reserves*.
Rationale: No net loss language is consistent with Shoreline Master Programs (WAC-173-26-201(3)(E)(iii)) for the purpose of avoiding cumulative impacts.

Draft Theme Goal 1: Protect and preserve *existing sustainable uses* ~~for coastal communities~~ to ensure economic vibrancy *for coastal communities*.
Rationale: We agree with the WCMAC recommended language as proposed on page 11 of the scoping document.

Draft Objective 1: Protect and *preserve* healthy existing natural resource-based economic activity on the Washington Coast.

Draft Theme Goal 2: Maintain maritime coastal communities from now into perpetuity.

Draft Objective 2: Sustain diverse traditional uses *and experiences* to ensure continuity of WA's coastal identity, culture, and high quality of life.
Rationale: Add "and experiences" because experiences are distinct from "uses". For example, the opportunity to experience remoteness and untrammeled nature is intrinsic to the Wilderness designation of Olympic National Park's coastal strip.

Draft Theme Goal 3: *Achieve overall improvements to ecological functions and exclude marine-based finfish aquaculture for commercial purposes and the importation of new non-native species.*

Rationale: The original Draft Theme Goal 3 was much too general. The language "*Achieve overall improvements to ecological functions*" is drawn from WAC 173-26-201(2)(f)), and shoreline master programs. We feel that, in light of unacceptable environmental risks, finfish aquaculture is only justified in cases of temporary holding pens used to support native runs of salmonids.

Draft Objective 3: Foster healthy and resilient *natural* marine ecosystem functions, biodiversity and habitats.
Rationale: Add "natural" for consistency with overarching goal.

Draft Theme Goal 4: Develop an integrated decision-making process which supports proactive, adaptive and efficient spatial planning.

Draft Objective 4: Develop a locally supported and collaborative process for aligning management decisions *and scaling any ocean energy development to the needs of Washington State communities*.
Rationale: Washington State's intact coastal ecosystem should not be compromised to meet the needs of more populous states.

Draft Theme Goal 5: Encourage economic development that recognizes the aspirations of local *and tribal* communities *while respecting and integrating existing management plans and authorities*.
Rationale: Existing designations and protections along our coast are the foundation for the plan and should be respected through the course of future economic development.

Draft Objective 5: Enhance sustainable economic opportunities to achieve a resilient economy and improved quality of life.

Proposed Boundary for MSP Study Area:
We support establishing the boundary of the MSP Study Area at 700 fathoms to include the majority of coastal vessel traffic and fishing-related activity and less stable bottom topography.

We look forward to the next stage of the MPS process and reviewing the results of the sector, aesthetic and ecological analyses as well as the new maps and ecosystem assessment.

Sincerely,

John Austin

Phil Johnson

David Sullivan

From:	Key McMurry
To:	ECY RE MSP Comments
Subject:	CMSP Comments
Date:	Monday, September 23, 2013 4:38:30 PM
Attachments:	Grays Harbor County MRC - 4-17-13.pdf North Pacific Coast MRC - 4-18-13.pdf Pacific County MRC - 4-9-13.pdf Pacific County MRC - 4-10-13.pdf Wahkiakum MRC - 4-22-13.pdf

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Please include the 5 Public CMSP Meetings final report, that the 4 Coastal MRC's put on. I will send it later this evening, but it may be after 5:00. This is a placeholder for that final report. I have attached the notes from the 5 meetings. I strongly support the final report being included as part of the public comments. I support the outcomes in the final report.

I also strongly support Dale Beasley's letter from the Coalition of Coastal Fisheries and the Pacific County Marine Resources CMSP comment letter that were submitted as part of the public comments.

These are all needed in the CMSP and are in no particular order.

1. Protect and Preserve existing sustainable uses, this has to be first and foremost.
2. CMSP and SMP are very closely tied, Pacific County received a laughable amount to complete the SMP updates. Pacific County has the most shoreline miles out of any county in the state of Washington.
3. CMSP has to be bottom's up and stakeholder driven. We have to have our coastal voice.
4. We need to go out to the 200 miles CMZA line. Match it with our existing state regulations on crab that goes to 200 miles. This will provide the coast the most protection.
5. We need to somehow make beach nourishment with the dredged material CMSP priority.
6. Dredging of our small coastal ports is crucial. We need to get this into the President's budget.
7. Oil Spill Prevention should also be a top priority.
8. We still need to push for more oil response boats, tugs.
9. Supply our ports with enough materials to handle a small to medium size spill.
10. Repair failing infrastructure: railway lines (culvert, bridges, etc.) roads (culverts, bridges, etc.).
11. If any offshore energy is approved have to have a contingency funds (upfront) as a requirement made available by the companies purposing the offshore energy. To clean up any mess or debris left behind.
12. Create and grow more jobs for the coast.
13. Be proactive instead of reactive.
14. Proper goals and objectives established for any proposed projects (3.7 million), have to have a proper RFP for every project, no direct contracts. All projects need to have an open bidding process.
15. Each project need a detailed scope of work, deliverables, timelines, and budget for each project.
16. The neutral convener (facilitator) should be interviewed and hired by the WCMAC, or at least the WCMAC should be heavily involved.

17. Before any money is spent, we need a detailed summary of each project and what we got for when we spent 2.1 million.

Thanks Key

Key Environmental Solutions, LLC.
Key McMurry, Owner/Professional Stream & Wildlife Biologist
550 Mill Creek Road
Raymond, WA 98577
Office: 360-942-3184
Cell: 360-562-5763
Fax: 360-942-0260
www.keyenvironmentalsolutions.com

From: Mark Cedergreen
To: ECY RE MSP Comments
Subject: Comments on Coastal Marine Spatial Plan
Date: Monday, September 23, 2013 10:36:08 AM

With respect to the draft Goals and objectives developed at the workshops last spring, it appears to me that the workshop product has a higher priority than the multiple times that WCMAC has affirmed and reaffirmed that our major goal is to "Protect, Preserve, and Grow Existing Sustainable Uses". Draft Theme Goal 1 does not accomplish that objective. It also appears to me that this plan is being set up, not for the benefit of existing coastal industry and economy but as a fairly loose sieve for crony capitalists to facilitate their subsidized ocean energy projects. In simpler words I have been told enumerable times in the past 6-8 years by state and federal officials that this plan would be a BOTTOM UP plan. So far it's plain to me and most folks on the coast that it's not bottom up but TOP DOWN. I totally support the recommendations made by WCMAC at its meeting subsequent to the draft MSP.
Mark Cedergreen

UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
NATIONAL OCEAN SERVICE
OFFICE OF NATIONAL MARINE SANCTUARIES
Olympic Coast National Marine Sanctuary
115 East Railroad Avenue, Suite 301
Port Angeles, WA 98362-2925

September 16, 2013

Washington Department of Ecology
SEA Program
PO BOX 47600
Olympia, WA 98504-7600

Department of Ecology
RECEIVED
SEP 19 2013
Shorelands & Environmental
Assistance Program

Washington State Marine Spatial Planning Team:

We appreciate the opportunity to comment on Washington State's significant efforts in marine spatial planning (MSP) for the Washington coast. The coordination between NOAA's Olympic Coast National Marine Sanctuary (OCNMS or sanctuary) and state of Washington is significant, substantive and reaches back prior to the sanctuary designation in 1994. Collaboration and coordination are identified as priorities in our current management plan, and they are essential to both marine spatial planning and effective sanctuary management. It is in this spirit that we provide comments to the MSP scoping document, as well as our continued support for your future efforts.

In 1988, at the time the National Marine Sanctuary Act was reauthorized, Congress directed the Secretary of Commerce to designate the Olympic Coast National Marine Sanctuary. This language was the direct result of efforts by Washington State's congressional delegation. State agency staff and the Governor's office were involved throughout the designation process, with the Governor approving the sanctuary designation document and state agencies determining the designation was consistent with the state's coastal zone management program. This consistency was reaffirmed as recently as 2011 when OCNMS updated its management plan. Sanctuary staff have also followed and supported the development of the state's Ocean Action Plan and have supported the development of the state's marine spatial plan, contributing in a number of areas. It is by design and the result of consistent coordination that the state's Ocean Action Plan and our 2011 management plan are well-aligned. It is our hope that OCNMS' goals and objectives and the State of Washington's marine spatial plan will be aligned in a similar fashion.

As noted in the MSP scoping document, one of the principles of RCW 43.372.040 is that the MSP "integrates existing management plans and authorities and makes recommendations for aligning plans to the extent practicable." We believe that integration and alignment with the OCNMS management plan and authorities will greatly strength the state's MSP. In addition, existing coordinating mechanisms should also be recognized and incorporated into the MSP. These include, but are not limited to the OCNMS Advisory Council and the Olympic Coast Intergovernmental Policy Council. Your current draft theme goal 4 refers to "integrated decision

9/17/13

making", but the associated objective seems focused on the local community. We recommend either editing this objective or adding a second objective under that goal, making coordination with existing authorities explicit.

In addition to the alignment in goals and objectives, the spatial overlap between sanctuary boundaries and the potential geographic scope for the MSP are significant. Approximately 17% of OCNMS is within state waters, and OCNMS is adjacent to over 50% of Washington's outer coastline. OCNMS is also mostly within both proposed MSP boundary options. On the proposed boundary options, we support the inclusion of the sanctuary into the geographic scope of the state's MSP and believe that this will have value to both NOAA and the state of Washington.

Sincerely,

Carol Bernthal

Carol Bernthal, Superintendent
Olympic Coast National Marine Sanctuary

September 23, 2013

Mr. Gordon White

Department of Ecology
SEA Program
PO Box 47600
Olympia, WA 98504-7600

RE: **SEPA Lead Agency, Determination of Significance and Request for Comments on Scope of Environmental Impact Statement for the Pacific Coast Marine Spatial Plan**

The Port of Seattle appreciates the opportunity to provide comment on the Scoping Document for a Marine Spatial Plan (MSP) on Washington's Pacific Coast. The Port of Seattle is well aware of other MSPs conducted in the United States and the positive benefits such planning efforts can derive. The overall concept of marine spatial planning is sound particularly when it relates to proposed new developments that can conflict with existing uses. With these overarching positive principles in mind the Port of Seattle provides the following comment on the subject matter.

1. In reviewing posted documents, we note the participant list of attendees for the three workshops held in the spring of 2013 contain no representatives from public ports nor was there a representative from the Washington Public Ports Association (WPPA). We note that there are three public ports within the proposed planning area boundary, but none of them appear to be proactively involved in MSP. For any future MSP process anywhere in the state, we specifically request that a concerted effort be made to include public ports in the MSP process.

2. The Public Scoping Document contains, "*a list of potential marine activities that were of concern and might be addressed through the MSP…*" Regarding this list, the Port of Seattle urges that MSP focus less concern on existing activities and more concern on new developments that might be constructed to support new activities in any given area. The Port of Seattle believes that public ports in general would be apprehensive towards MSP attempting to alter the normal operating location of legitimate and established existing activities.

Of the listed "activities of concern", we are particularly interested in the rights of shipping, dredging, and dredge disposal to exist without any further and potentially unnecessary restrictions or locational alterations. Perhaps it is simply unintended semantics, but the statement within the Scoping Document that identifies shipping and dredging activities as a "concern" is troubling to us. We believe that other public ports in the state would share out concerns. Though these activities vary in frequency they all occur within well-established geographic boundaries.

Practically all dredging activity occurs within existing federally authorized channels. Further, dredging for maintenance purposes can be ongoing and routine in nature. Existing dredge disposal sites have been established with the permission of the Department of Ecology and use of such sites is highly regulated.

Shipping is another existing activity that is not by nature static. Ocean carriers calling at public ports frequently change vessel rotations or add new services resulting in a fluctuating amount of actual shipping that calls at Washington State ports. Regardless of the actual number of vessels visiting state waters, these vessels transit in existing and well established vessel traffic lanes.

Because of our concerns stated above, we recommend that the MSP Scoping Process clarify that the goals and objectives of MSP is to ensure that future developments related to marine activities are appropriately sited such that existing activities and new development can successfully coexist. Within this proposed clarification of MSP, spatial analysis of any new proposal for creating additional navigation channels, vessel transit lanes or dredge disposal sites would be consider legitimate for the MSP process. Fluctuating frequencies of existing activities occurring within existing and established spatial boundaries, in and of themselves, should not be appropriate subjects for initiating a MSP process unless such analysis is performed as part of a proposed new offshore development.

3. Because the Ordinary High Water Mark establishes the boundary of MSP, public port authorities fall within the realm of MSP. Consequently, we recommend that any MSP be consistent with locally derived Shoreline Master Programs. Further, port authorities generally have developed numerous planning documents, studies and / or official plans that describe future development goals. We recommend that such documents generated by port authorities be provided special consideration within the context of MSP. As with "federal consistency", MSP should be consistent with existing port plans.

Port of Grays Harbor

On Washington's Pacific Coast

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September 23, 2013

Mr. Gordon White
Department of Ecology
SEA Program
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Olympia, WA 98504-7600

RE: Request for Comments on Scope of Environmental Impact Statement for the Pacific Coast Marine Spatial Plan

The Port of Grays Harbor appreciates the opportunity to provide comment on the Scoping Document for a Marine Spatial Plan (MSP) on Washington's Pacific Coast. The Port has attended many of the meetings sponsored by DOE and others on Marine Spatial Planning. We have dedicated time for representation on the Grays Harbor County Marine Resource Committee (MRC) as well as the WCMAC. Our experience has shown that the diverse nature of the stakeholders, the complexity of the topics, a lack of clarity of roles, and time limitations have led to a limited process to date, and not necessarily representative of a consensus.

We participated with Sen. Hargrove and Sen. Ranker on the initial legislative intent for the Marine Spatial Bill (Chapter 43.372 RCW). In these discussions, the Senators made it clear that the intent was to preserve and protect existing uses when evaluating new uses of our Coast. At the time, one of the major concerns was the development of alternative energy sources in Coastal waters and how they might impact traditional uses. The overall concept of marine spatial planning is sound, particularly when it relates to proposed new developments that can conflict with existing uses.

With these overarching positive principles in mind, the Port of Grays Harbor provides the following comments on the EIS Scoping:

1. First, we are wondering about SEPA procedures. It seems that the project (a MSP) should be well defined before undertaking EIS development. As you have pointed out, the legislature, and the work to date, have provided some guidance as to what the plan might contain, but key issues such as policy extent, geographic extent, and implementation mechanisms have not been defined. These, after they are defined, should be subject to SEPA Scoping. Consequently, your effort now seems pre-mature, unless Ecology has pre-determined the detailed content of the plan and how it will be implemented.

Commissioners
Jack Thompson
Chuck Caldwell
Stan Pinnick

Executive Director
Gary G. Nelson

2. In addition, and in our opinion, the work of WCMAC and MRC's as non-regulatory policy advisors needs to be better defined relative to this process. Our experience with the meetings of both the MRC and WCMAC has demonstrated confusion as to the role of these groups - specifically in the development of the MSP. Too often we have found meetings sidetracked by individual stakeholders desiring a premature or perhaps inappropriate debate on specific projects or uses.

On the other hand, these groups clearly have the role of defining traditional uses i.e. native fishing, commercial fishing, recreational boating, maritime trade which they have done well in sessions we have attended.

3. The Public Scoping Document contains, "a list of potential marine activities that were of concern and might be addressed through the MSP…" Regarding this list, the Port of Grays Harbor urges that the MSP focus less concern on existing activities and more concern on new developments that might be constructed to support new activities in any given area. We are, and will continue to be, concerned with any proposals that would alter the normal operating location of legitimate and long established existing activities.

Of the listed "activities of concern", we are particularly interested in the assuring that shipping, dredging, and dredge disposal will continue to be "existing uses" without any further and potentially unnecessary restrictions or locational alterations. We have reviewed the Port of Seattle's comments on this subject, and concur with them in their concern with a Scoping Document that identifies shipping and dredging activities as a "concern." This is troubling given our understanding of the mandate for a MSP. These activities occur within well-established geographic boundaries and are well regulated by several state and federal agencies.

Maritime shipping is a long established use that follows existing and well established traffic lanes. We believe it not to be in the interest of a trade dependent state like Washington to try and alter this use based on a type of cargo as has been discussed in the WCMAC. We could run the risk of discouraging or inadvertently diverting cargo away from our State by allowing these policy advisory groups to censor cargoes in traditional traffic lanes. As long as cargoes are legally being transported and meet all regulatory safe guards they should not be subject to sanction by stakeholders under the guise of Marine Spatial Planning.

Because of our concerns stated above, we recommend that the MSP Scoping Process clarify that the goals and objectives of MSP are to ensure that future developments related to marine activities are appropriately sited such that existing activities and new development can successfully coexist. Within this proposed clarification of MSP, spatial analysis of any new proposal for creating additional navigation channels, vessel transit lanes or dredge disposal sites would be considered legitimate for the MSP process. Fluctuating frequencies of existing activities occurring within existing and established spatial boundaries, in and of themselves, should not be appropriate subjects for initiating a MSP process unless such analysis is performed as part of a proposed new offshore development.

4. The boundaries of the MSP are not yet defined. This raises many issues as to the Scope of an EIS. The estuaries of Grays Harbor and Willapa Bay have specifically been mentioned as part of this boundary. Aside from the international and other issues related to the exclusion of the Puget Sound Estuary, there are significant policy issues which will need to be addressed.

Again, the mechanisms for implementation of the results of the MSP process should be defined. Approval of Coastal Zone Consistency has been mentioned as a requirement, but this is dependent on approval of the State's Shoreline Policies (Shoreline Management Act). What are the implications to local governments and their Shoreline Master Plans?

We are aware that the Shoreline Master Programs can change and these changes are controlled by rules established by the Department of Ecology. Is it Ecology's intent to implement MSP through Ecology's Shoreline Regulations? If so, we should be having a discussion on that topic prior to this Scoping exercise.

Again, thank you for the opportunity to comment. If you have any questions, please feel free to contact me at 360-533-9530.

Sincerely,

Gary Nelson
Executive Director

The Nature Conservancy
Protecting nature. Preserving life.™

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September 23, 2013

Washington Department of Ecology
SEA Program
PO Box 47600
Olympia, WA 98504-7600

RE: Public Comment Scoping Document for a Marine Spatial Plan on Washington's Pacific Coast
Delivered via e-mail to: MSPComments@ecy.wa.gov

Department of Ecology and State Ocean Caucus:

Thank you for the opportunity to comment on the development of a marine spatial plan for Washington's Pacific Coast. The Nature Conservancy's mission is to conserve the lands and waters on which all life depends. We have actively supported the marine spatial planning process since state legislation was proposed, and we are pleased to see progress being made toward a plan for the Pacific Coast.

The Nature Conservancy (TNC) supports coastal and marine spatial planning processes in many places around the world because it can provide a strong framework for protecting marine ecosystems and managing ocean uses. Marine spatial planning can also proactively address new and increasing human activities in the marine environment that may create future impacts or conflicts. The Nature Conservancy's goal in participating in and supporting marine spatial planning in Washington is to conserve the habitats and ecosystem services that sustain marine life, so that humans can prosper from and enjoy a healthy, living ocean.

Given our Pacific Coast communities' high dependence on ocean resources and their vulnerability to changes in the ocean and ocean use, the marine spatial plan should be as comprehensive as possible, even if only a limited plan is attainable in the next two years. As you noted in the Public Comment Scoping Document (page 4), state legislation (RCW 43.372.040) requires a comprehensive marine management plan and directs that the plan should "…provide an adaptive management element to incorporate new information and consider revisions to the plan based upon research, monitoring, and evaluation."

The most straightforward way to provide the adaptive management element—and to build a comprehensive plan over time—is to create a geospatial information system that houses the data used to create the plan as well as data layers that reflect the provisions of the plan and other elements of law applying to marine waters. These geospatial data, together with related information rendered as text and graphics, should be continually available to the public via an interactive, state-managed web site (e.g., http://www.msp.wa.gov/ or https://fortress.wa.gov/ecy/coastalatlas/). TNC recognizes that the state has embarked on this course, and we encourage you to increase the level of cross-agency collaboration on the effort. There will be many public benefits from doing so, including efficient coordination on future use permitting decisions that fall within the authorities of multiple agencies.

The Public Comment Scoping Document invites comments on seven areas of interest, and we will touch on each of them here. For your convenience in reviewing this letter we have provided headings that reference those areas.

Purpose and need for a Marine Spatial Plan, including comments on the draft goals and objectives, and rationale for any suggested changes based on the criteria.

Purpose and need. The purpose and need for a Marine Spatial Plan (MSP) are adequately described in RCW 43.372. Section 005 on Findings and Purpose notes that our marine waters "…are abundant in natural resources, contain a treasure of biological diversity, and are a source of multiple uses by the public supporting the economies of nearby communities as well as the entire state." And, "These multiple uses as well as new emerging uses, such as renewable ocean energy, constitute a management challenge for sustaining resources and coordinating state decision making in a proactive, comprehensive and ecosystem-based manner." With these statements framing the need, the purpose of RCW 43.372—and by inference the purpose of the comprehensive marine management plan—is "…to establish policies to guide state agencies and local governments when exercising jurisdiction over proposed uses and activities in these waters." Thus, while the MSP may be non-regulatory it should reflect marine policy for the State of Washington and interpret that policy in a spatially explicit way.

It is important that the MSP serve the needs of state agencies and local governments regardless of whether the plan fits entirely within the federal coastal zone management framework. The Public Comment Scoping Document feeds some confusion in this regard. State legislation requires the MSP to be submitted to NOAA for approval in the federal/state policy framework of the Coastal Zone Management Act. The Department of Ecology is understandably depending on NOAA for guidance on what falls within the provisions and current practices of that framework. However, the state legislation does not bind state agencies to implement the MSP *solely* through Washington's Coastal Zone Management Program, and the MSP should not be limited by provisions of the federal Coastal Zone Management Act.

For example, the state legislation requires the MSP to provide state recommendations to the federal government on uses within the Exclusive Economic Zone (EEZ) that are "consistent with the policies and management criteria contained in 43.372 RCW and 43.143 RCW." Chapter 43.143 RCW is the state's Ocean Resources Management Act, which establishes policy statements concerning trade-offs among estuarine and marine uses that are much more specific than the federal Coastal Zone Management Act. Likewise, the State Ocean Caucus in its criteria for goals and objectives (page 6 of the Public Comment Scoping Document) lists other state laws that may fall outside the framework of the Coastal Zone Management Act.

Whenever the need for policy guidance to state agencies and local governments conflicts with fitting the plan into the Coastal Zone Management framework, it is the recommendation of The Nature Conservancy that the MSP be developed to address the state and local need for guidance. The MSP should, for example, include a series of maps indicating where certain uses would be allowed or disallowed based on policies established in the state's Ocean Resources Management Act.

Draft goals and objectives. Goals, as defined by the Public Comment Scoping Document, should not be particularly difficult to develop considering all the guidance in state legislation. The Nature Conservancy

supports the Draft Overarching Goal: To ensure a resilient and healthy marine ecosystem on Washington's coast that supports sustainable economic, recreational, and cultural opportunities for coastal communities, visitors and future generations.

In all discussions of the goals of the plan in future documents, the entire set of requirements from the state legislation should be repeated. These are state government's expectations for the comprehensive marine management plan, and they should not be diluted or constrained by any language developed subsequent to the legislation. The narrative for the comprehensive marine management plan should include a discussion of how each of the requirements is met by the MSP.

In contrast to the goals, developing specific objectives that meet the mandate for a comprehensive marine management plan and adequately serve the broader goals is a challenge. The articulation of objectives and creating alternative scenarios for meeting them are the newest and most rapidly developing areas of marine spatial planning. It is essential for any publicly promulgated plan that the aims are clear and stakeholders are engaged. Because marine spatial planning is new and addresses multiple management objectives, the issue of clarity is paramount. The Nature Conservancy's opinion is that objectives for the current planning process on the coast are not yet clear, and that public buy-in for the objectives has not been achieved.

The Public Comment Scoping Document lays the groundwork for discussing goals and objectives on page 5 by listing marine activities that were noted by workshop participants and the Washington Coastal Marine Advisory Council (WCMAC) as being of concern. Below that list, the scoping document poses questions to guide whether an activity will be addressed by the MSP. Questions 3 and 4 are problematic because they would unnecessarily constrain the MSP and its application to state marine resource management policy:

> *3. At what scale is the activity or problem occurring such as global, regional, state, or local? Can this activity be effectively managed at the state or local level?*
>
> *4. Is there an existing state or local mechanism that applies to managing the particular activity, issue or problem? Would developing a MSP assist in filling a management gap for the particular activity, issue or problem?*

With regard to question 3, state legislation directs the MSP to provide guidance to federal agencies on activities in the EEZ. Whether or not an activity can be effectively managed at the state or local level is irrelevant to this purpose. This question might also be interpreted to imply that the MSP should not address impacts from climate change, but the state legislation requires it.

With regard to question 4, the MSP is not being created solely to fill management gaps. The enabling legislation directs the state to meet all of the requirements detailed in Chapter 43.372.040 RCW (some of which are referenced in the Public Comment Scoping Document on pages 3 and 4). Even if the state already has a mechanism for managing an activity, it should be reflected in the MSP as a means to meet those requirements, particularly to foster public participation in decision making, to integrate existing management plans, and to summarize human uses of marine waters.

The Public Comment Scoping Document also lists criteria on page 6 that will be used by the State Ocean Caucus "in considering public comments on the draft goals, objectives and boundary for the marine

spatial plan." The Nature Conservancy does not agree that the only appropriate objectives for the MSP are those that meet the SMART criteria. SMART criteria are often desirable in setting objectives, and The Nature Conservancy applies them to setting certain kinds of objectives for our organization; however, it is not clear how the State Ocean Caucus will apply them in this situation, or what the value of the criteria are to guiding the MSP. It does not appear that any of the draft objectives presented in the Scoping Document meet the SMART criteria.

Rationale for suggested changes. The Nature Conservancy recommends that language from Chapter 43.372.040, specifically Sections 4(a) through 4(h), be adopted as the goals of the coast MSP. These statements meet the definition of goals offered in the Public Comment Scoping Document on page 6: "Goals are broad statements and describe the overall vision stated in practical terms." Adopting goal language directly from the legislation ensures clarity of purpose and assures the planning process will meet the requirements set by state elected officials.

To repeat the language from the legislation referenced above:
(4) The marine management plan must be developed and implemented in a manner that:

> *(a) Recognizes and respects existing uses and tribal treaty rights;*
> *(b) Promotes protection and restoration of ecosystem processes to a level that will enable long-term sustainable production of ecosystem goods and services;*
> *(c) Addresses potential impacts of climate change and sea level rise upon current and projected marine waters uses and shoreline and coastal impacts;*
> *(d) Fosters and encourages sustainable uses that provide economic opportunity without significant adverse environmental impacts;*
> *(e) Preserves and enhances public access;*
> *(f) Protects and encourages working waterfronts and supports the infrastructure necessary to sustain marine industry, commercial shipping, shellfish aquaculture, and other water-dependent uses;*
> *(g) Fosters public participation in decision making and significant involvement of communities adjacent to the state's marine waters; and*
> *(h) Integrates existing management plans and authorities and makes recommendations for aligning plans to the extent practicable.*

With regard to the recommendation of the Washington Coast Marine Advisory Council (WCMAC) on language for draft goal and objective 1, our recommendation above would support the concept: "protect and preserve existing sustainable uses" using language in 4(a), 4(d), 4(f), and 4(g).

The draft objectives presented in the Public Comment Scoping Document do not meet the definition of objectives stated in the document: "Objectives are specific statements detailing the desired accomplishments or outcomes of a planning process. Objectives describe how the goal or vision will be achieved." Given The Nature Conservancy's recommendation regarding goals, above, we suggest that a new process be undertaken to engage the WCMAC and coastal constituents in developing objectives that support the legislation's goals, guided by the Coastal Voices report. We also recommend that the criteria for considering those objectives be adjusted in line with our remarks earlier in this section.

Geographic scope, or boundary, of the plan's study area and rationale for particular boundary based on the criteria.

We noted earlier in this document that the state legislation regarding a comprehensive marine management plan requires the plan to include "An element that sets forth the state's recommendations to the federal government for use priorities and limitations, siting criteria, and protection of unique and sensitive biota and ocean floor features within the exclusive economic zone waters consistent with the policies and management criteria contained in this chapter and chapter 43.143 RCW" (Chapter 43.372.040 Section 6(d)).

This requirement argues for a seaward planning boundary of 200 miles from shore. However, if the state agencies and constituents agree that the state's interest in "use priorities and limitations, siting criteria, and protection of unique and sensitive biota and ocean floor features" all lie within an area closer to shore, then the proposed planning boundaries of 400 fathoms or 700 fathoms would be acceptable. Given our knowledge of available data, current uses, and likely future uses The Nature Conservancy recommends the 700 fathom line as the seaward planning boundary, noting that an adaptive management approach could extend this boundary as needed to address future uses. Our rationale for this recommendation is that the 700 fathom boundary would allow the state to develop recommendations to the federal government on ocean uses that could conflict with important Washington-based fishing activity, other than fishing for Highly Migratory Species that ranges outward beyond 700 fathoms and the boundary of the EEZ.

Potential activities to address in the plan.

The Nature Conservancy supports the list of activities to be addressed proposed by the WCMAC:

- Renewable energy such as wind, wave, tidal
- Marine Preserves such as Marine Reserves or Natural Area Designations
- Oil and mineral mining
- Offshore aquaculture
- Cable laying
- Dredging and dredge disposal
- Shipping

We offer two notes with regard to this list:

1. This should be considered an *initial* list of activities to be addressed, and the ability to address additional activities should be reserved under the requirement that the MSP present an adaptive approach to management; and
2. "Shipping" should address the potential increased risk of accidental spills from projected increases in vessel traffic, particularly for the shipment of oil or other polluting cargoes.

Specific metrics for measuring progress toward achieving draft objectives.

Comments on this subject are premature given our concern that the draft objectives do not support appropriate goals for the planning process.

Scope of program-level environmental studies or other studies to conduct.

The MSP would benefit from an updated benthic habitat map for the planning area. The Nature Conservancy produced such a map based on data available in the early 2000s, and the same methods could be used with more recent data to update the map.

Consistent with our comments on activities to be addressed, above, The Nature Conservancy also recommends an assessment of sensitive and exceptional ecological areas that may merit protection under special designations, e.g., Habitat Areas of Particular Concern or Aquatic Reserves. These should particularly target habitats that produce fish and shellfish and that could be impaired by uses other than fishing.

The Nature Conservancy also supports an assessment of important fishing areas, which could be afforded protection under the MSP to prevent conflicting uses from being permitted. Given the degree to which fishing activity is managed under state, tribal, and federal law, such areas would almost certainly produce substantial ancillary conservation benefits as a consequence of being protected from other uses.

Substantial issues and concerns that should be addressed in the Marine Spatial Plan and EIS.

Consistent with our comments at the beginning of this letter, the state agencies should address each and every requirement of the comprehensive marine management plan identified in state legislation, consistent with other state laws identified in the Public Comment Scoping Document. In particular, the State Ocean Caucus should present mechanisms for using the MSP for:

> *Using and relying upon existing plans and processes and additional management measures to guide decisions among uses proposed for specific geographic areas of the state's marine and estuarine waters consistent with applicable state laws and programs that control or address developments in the state's marine waters;* (Chapter 43.372.040 RCW Section 6(b)).
>
> *…improve[ing] the coordination among state agencies in the development and implementation of marine management plans.* (Chapter 43.372.005 RCW Section 2). And,
>
> *Establish[ing] or further promot[ing] an ecosystem-based management approach including linking marine spatial plans to adjacent nearshore and upland spatial or ecosystem-based plans;* (Chapter 43.372.005 RCW Section 3(e)).

Potential impacts (beneficial, adverse, direct, indirect, and/or cumulative) and mitigation.

The Nature Conservancy recommends using specific objectives (not yet developed) to inform scenarios for current and future uses and their potential conflicts with one another and with the vulnerabilities of particular places and habitats to describe potential impacts and identify appropriate trade-offs and/or mitigation. The methods for developing such scenarios and identifying trade-offs are becoming well established in marine planning processes elsewhere, and these can be adapted for use in Washington. The Nature Conservancy and Ecotrust demonstrated such an approach in their 2012 pilot project in cooperation with the Pacific County Marine Resources Committee.

Again, thank you for the opportunity to comment on this stage of developing the MSP for Washington's Pacific Coast. While our comments here are critical of the process to date, we recognize that this is a new endeavor that challenges state agencies and their constituents. The Nature Conservancy is ready and willing to provide information and technical support for the process.

Paul Dye
Director of Marine Conservation / Washington
pdye@tnc.org

SURFRIDER
FOUNDATION
NORTHWEST STRAITS CHAPTER
P.O. Box 2973
Bellingham, WA 98227
nws@surfrider.org

September 19, 2013

To Whom It May Concern:

The Northwest Straits Chapter of the Surfrider Foundation is heavily involved in coastal recreation with primary attention directed to surfing, and is committed to recreational access, clean water, and preserving local economic uses. Marine spatial planning has the opportunity to help us with this mission. The Northwest Straits Chapter would like the Washington State Department of Ecology to please consider the following in future drafts of an MSP plan:

- Include the overarching goal of "Protect and preserve existing sustainable uses" to the current drafted goals and objectives;

- Prioritize and value the protection of and access to recreational areas for both coastal communities who benefit economically as well as the general public whose lives are enhanced by outdoor experiences;

- Further emphasize the need to protect the marine ecosystem and its subsequent habitats, biodiversity, and ecological functions;

- Conduct a study that collects spatial and economic data on non-consumptive recreational uses of the coast.

Thank you for your time and consideration to ensure the future enjoyment of our beautiful Washington State's coast.

Sincerely,

Eleanor Hines
Chapter Chair
Northwest Straits Chapter
Surfrider Foundation
215-287-0043
nws@surfrider.org

Pacific Coast Marine Spatial Plan
SEPA Environmental Impact Statement Scoping
Public Comment Form

Please submit by September 23, 2013 to mspcomments@ecy.wa.gov

Description of proposal

> Develop a Marine Spatial Plan for Washington's Pacific Coast to address increasing pressures on the resources in this area, conflicts among uses, and proposed new uses (RCW 43.372).

Prior to preparing and submitting comments, we strongly encourage those commenting to review the public scoping document at: http://www.msp.wa.gov/news

1. **Purpose of and need for a Marine Spatial Plan**, including comments on the draft goals and objectives, and rationale for any suggested changes based on the criteria. What changes should be made to the goals and objectives and why?

   Include the goal of "Protect and preserve existing sustainable uses." While this theme is implied within the current goals, coastal constituents were very clear that they wanted this goal included, and there was little to no opposition to it at the public meeting. It is a short and concise goal that coastal communities and users feel will protect their economies and resources.

   The draft objectives do not follow the SMART criteria, despite the intention of doing so. They are essentially a reworded version of the goal. They are not very specific, have no measurables, the time-specific wording is only present in a few, and those have an infinite or open ended timeframe.

2. **Geographic scope, or boundary, of the plan's study area** and rationale for particular boundary based on the criteria. What should the study area for the plan be and why?

   ☐ 400 fathoms
   ☒ 700 fathoms
   ☐ Other:

   400 or 700 fathoms should be an adequate distance off the coast. However, using 700 fathoms captures the dynamic continental slope, which harbors sensitive biota that may be vulnerable to new uses.

3. **Potential marine waters activities to address in the plan.** Should the plan address potential activities other than renewable energy? If so, which other activities should be addressed?

Yes, the plan should be prepared to address any new projects that could adversely affect the health of the coastal ecosystem, communities, and economies. Other such projects that should be considered include off-shore aquaculture and the export of hazardous materials such as crude oil.

4. **Specific metrics for draft objectives.** What does the language in the draft objectives mean to you? How would you measure progress toward the objectives?

Metrics that would likely be good indicators would be economic stability, ecosystem health and resiliency, and fish, crab, and shellfish abundance.

5. **Scope of program-level environmental studies or other studies to conduct.** What type of environmental impacts should be included in the scope of environmental review and why? Which elements of the built and natural environment should be analyzed?

Impacts to ecological functions, critical species, water quality, fish populations, and recreational uses should be considered while scoping new projects. All of these are important to coastal economies, and no new project should be considered if it has any significant impact to the marine ecosystem.

6. **Substantial issues and concerns that should be addressed in the Marine Spatial Plan and draft EIS.**

A study collecting spatial and economic data on non-consumptive recreational uses needs to be done. A similar study has been completed in Oregon, and another one is underway in the Mid-Atlantic. This study provides very detailed spatial data, unlike the NOAA human uses maps, which was very broad and only provided two intensities of use. The economic data collected from such a study would be very valuable to coastal communities and would offer a baseline that could be used to measure potential impacts of new projects on recreational patterns.

7. **Potential impacts** (beneficial, adverse, direct, indirect, and/or cumulative) and **mitigation measures**.

The primary impacts that should be considered include the effects on biota, water quality, coastal economics, and shoreline resiliency. Mitigation should only be considered as a last resort.

Casey Dennehy
Washington Pacific Coast Project Coordinator
Surfrider Foundation
cdennehy@surfrider.org

Written comments will be accepted until **5 pm, September 23, 2013**.

Email electronic comments to: MSPComments@ecy.wa.gov
Send written comments to: Dept. of Ecology, SEA Program, PO Box 47600, Olympia, WA 98504-7600

9/23/13
10:41 CB

Name: JOSEPH WOOD

Email: josephwood@hotmail.com

Address: 9245 7TH AVE NW SEATTLE, WA 98117

As an active, aware, and concerned coastal user, I would like to express my thoughts regarding Washington's current Marine Spatial Planning Process. Therefore, I suggest the following:

- Include the goal of "Protect and preserve existing sustainable uses" to the current drafted goals and objectives.
- Conduct a study that collects spatial and economic data on non-consumptive recreational uses of the coast.
- Prioritize and value the protection of and access to recreational areas for both coastal communities who benefit economically as well as the general public whose lives are enhanced by outdoor experiences.
- Emphasize the need to protect the marine ecosystem and its subsequent habitats, biodiversity, and ecological functions.
- Further Comments:

Joseph Wood

Signature

09/21/13

Date

Name: BRITTANY GETZ

Email: getzbee22@gmail.com

Address: 272 HARBOR ST. / PO BOX 985
FLORENCE, OR 97439

As an active, aware, and concerned coastal user, I would like to express my thoughts regarding Washington's current Marine Spatial Planning Process. Therefore, I suggest the following:

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- Emphasize the need to protect the marine ecosystem and its subsequent habitats, biodiversity, and ecological functions.
- Further Comments:

Signature

9/21/13
Date

Name: Pete Stauffer

Email: pstauff@aol.com

Address: 4001 SE Ivon, Portland, OR 97202

As an active, aware, and concerned coastal user, I would like to express my thoughts regarding Washington's current Marine Spatial Planning Process. Therefore, I suggest the following:

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- ✓ Emphasize the need to protect the marine ecosystem and its subsequent habitats, biodiversity, and ecological functions.
- o Further Comments:

goals should emphasize recreational protection!

Pete Stauffer

Signature

Sept 18, 2013

Date

Name: COLE THOMPSON

Email: WCT25@yahoo.com

Address: 6414 14th Ave W #4 Seattle, WA 98107

As an active, aware, and concerned coastal user, I would like to express my thoughts regarding Washington's current Marine Spatial Planning Process. Therefore, I suggest the following:

- Include the goal of "Protect and preserve existing sustainable uses" to the current drafted goals and objectives.
- * Conduct a study that collects spatial and economic data on non-consumptive recreational uses of the coast.
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- Emphasize the need to protect the marine ecosystem and its subsequent habitats, biodiversity, and ecological functions.
- Further Comments:

* Make this happen please! this is the least we can do to recognize the importance of our marine resources & recreational opportunities.

Signature

9/21/13
Date

Name: BRUCE HOEFT

Email: brucehoeft@gmail.com

Address: 508 N 11TH ST, TACOMA WA 98403

As an active, aware, and concerned coastal user, I would like to express my thoughts regarding Washington's current Marine Spatial Planning Process. Therefore, I suggest the following:

- X Include the goal of "Protect and preserve existing sustainable uses" to the current drafted goals and objectives.
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- X Emphasize the need to protect the marine ecosystem and its subsequent habitats, biodiversity, and ecological functions.
- o Further Comments:

DEVELOP A MECHANISM TO DETERMINE THE MONETARY VALUE OF NON-EXTRACTIVE COASTAL USES

Signature

Date 9/21/13

Name: Ben Vargas

Email: BNVRGS@yahoo.com

Address: 2900 Walnut St Bellingham WA 98229

As an active, aware, and concerned coastal user, I would like to express my thoughts regarding Washington's current Marine Spatial Planning Process. Therefore, I suggest the following:

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- Emphasize the need to protect the marine ecosystem and its subsequent habitats, biodiversity, and ecological functions.
- Further Comments:

Signature

9/20/13
Date

Name: SAM SCHWARZ

Email: sam@studioschwarz.com

Address: P.O. BOX 33, COOS BAY OR 97420

As an active, aware, and concerned coastal user, I would like to express my thoughts regarding Washington's current Marine Spatial Planning Process. Therefore, I suggest the following:

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- Emphasize the need to protect the marine ecosystem and its subsequent habitats, biodiversity, and ecological functions.
- Further Comments:

Sam Schwarz

Signature

Sept 21, 2013

Date

Name: Eleanor Hines

Email: e128526@aol.com

Address: 1017 Key St #3, Bellingham, WA 98225

As an active, aware, and concerned coastal user, I would like to express my thoughts regarding Washington's current Marine Spatial Planning Process. Therefore, I suggest the following:

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- Emphasize the need to protect the marine ecosystem and its subsequent habitats, biodiversity, and ecological functions.
- Further Comments: Plan for coastal resiliancy in regards to potential climate change impacts.

Eleanor E. Hines
Signature

9/21/13
Date

Name: Talmage Vick

Email: tal@surfclassic.com

Address: 4131 178th LN SE, APT 5, BELLEVUE, WA 98008

As an active, aware, and concerned coastal user, I would like to express my thoughts regarding Washington's current Marine Spatial Planning Process. Therefore, I suggest the following:

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- Further Comments:

Talmage P. Vick

Signature

9-21-2013

Date

Name: Caroline Emch-Wei

Email: caroline.emchwei@gmail.com

Address: 811 SE 5th, 7A
Newport, OR, 97365

As an active, aware, and concerned coastal user, I would like to express my thoughts regarding Washington's current Marine Spatial Planning Process. Therefore, I suggest the following:

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- Further Comments:

Signature

09/21/13
Date

Name: Peter Snell

Email: [redacted] npt surfriderce@gmail.com

Address: Newport, OR 97365

As an active, aware, and concerned coastal user, I would like to express my thoughts regarding Washington's current Marine Spatial Planning Process. Therefore, I suggest the following:

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- o Further Comments:

Peter Snell
Signature

9/21/13
Date

Name: Jean Olson

Email: orcajean@hotmail.com

Address: 7030 34th Ave NE Seattle, WA 98115

As an active, aware, and concerned coastal user, I would like to express my thoughts regarding Washington's current Marine Spatial Planning Process. Therefore, I suggest the following:

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- Further Comments:

Jean Olson

Signature

9-21-13

Date

Name: NICHOLAS COCHRAN

Email: ncochran@pugetsound.edu

Address: 1714 N Oakes Street, Tacoma, WA 98406

As an active, aware, and concerned coastal user, I would like to express my thoughts regarding Washington's current Marine Spatial Planning Process. Therefore, I suggest the following:

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- Emphasize the need to protect the marine ecosystem and its subsequent habitats, biodiversity, and ecological functions.
- Further Comments:

Signature

9/21/13
Date

Name: Anna Davis

Email: annarobin@gmail.com

Address: PO Box 2740 Hillsboro, OR 97123

As an active, aware, and concerned coastal user, I would like to express my thoughts regarding Washington's current Marine Spatial Planning Process. Therefore, I suggest the following:

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- Emphasize the need to protect the marine ecosystem and its subsequent habitats, biodiversity, and ecological functions.
- Further Comments:

Anna Davis

Signature

Sept 21, 2013

Date

Name: STEVE MURRAY

Email: foolholster@hotmail.com

Address: 3147 CRD AR [illegible] RD [illegible]

As an active, aware, and concerned coastal user, I would like to express my thoughts regarding Washington's current Marine Spatial Planning Process. Therefore, I suggest the following:

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- Emphasize the need to protect the marine ecosystem and its subsequent habitats, biodiversity, and ecological functions.
- Further Comments:

Signature

SEPT 21 2013

Date

Name: Amanda Mae Bomar

Email: ms.amanda.mae@gmail.com

Address: 7729 N. 80th St, Seattle WA 98103

As an active, aware, and concerned coastal user, I would like to express my thoughts regarding Washington's current Marine Spatial Planning Process. Therefore, I suggest the following:

- Include the goal of "Protect and preserve existing sustainable uses" to the current drafted goals and objectives.
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- Emphasize the need to protect the marine ecosystem and its subsequent habitats, biodiversity, and ecological functions.
- Further Comments:

Signature

9-21-2013

Date

Name: Robert Bullock Jr.

Email: bullockbobby@gmail.com

Address: 729 N 80th St Seattle WA 98103

As an active, aware, and concerned coastal user, I would like to express my thoughts regarding Washington's current Marine Spatial Planning Process. Therefore, I suggest the following:

- Include the goal of "Protect and preserve existing sustainable uses" to the current drafted goals and objectives.
- Conduct a study that collects spatial and economic data on non-consumptive recreational uses of the coast.
- Prioritize and value the protection of and access to recreational areas for both coastal communities who benefit economically as well as the general public whose lives are enhanced by outdoor experiences, and the local communities who ~~receive~~ depend on coastal tourism & recreation dollars (e.g. Forks, Neah Bay)
- Emphasize the need to protect the marine ecosystem and its subsequent habitats, biodiversity, and ecological functions.
- Further Comments:

Signature

9-21-13

Date

Name: Paige Maddock

Email: paigemaddock04@gmail.com

Address: 246 Stevens Rd, Victoria, BC, Canada V8E 2S1

As an active, aware, and concerned coastal user, I would like to express my thoughts regarding Washington's current Marine Spatial Planning Process. Therefore, I suggest the following:

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- Further Comments:

Signature

Sept 21/13

Date

Name: Matthew Unger

Email: matt@matthewunger.com

Address:

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- Emphasize the need to protect the marine ecosystem and its subsequent habitats, biodiversity, and ecological functions.
- Further Comments:
  Coordinate stakeholders and assessments internationally to increase impacts and efficacy of the Marine Spatial Planning Process,

Signature

Date Sept 21/2013

Name: Elizabeth macdonald

Email: littlemacdonald@gmail.com

Address: 3-3585 Cambie Street, Vancouver, BC V5Z 2W9

As an active, aware, and concerned coastal user, I would like to express my thoughts regarding Washington's current Marine Spatial Planning Process. Therefore, I suggest the following:

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- Further Comments:

Signature

Sep 21, 2013

Date

Name: Tayissa Tykajlo

Email: t.tykajlo@gmail.com

Address: #1102 1650 West 7th Vancouver BC V6J 5N1

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- Further Comments:

Signature

Sept. 21, 2013

Date

Name: KEN CAMPBELL

Email: Ken@ikkatsuproject.org

Address: 21 Salmon Beach, Tacoma, WA

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- Further Comments:

Recognize the value of recreational use of the marine environment. Show support for recreational users by increased facilities and infrastructure.

Signature

9/21/13
Date

Name: Taylor K. Wonhoff

Email: twonhoff@gmail.com

Address: 4215 S 30th St., #227, TACOMA WA 98409

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- Further Comments:

Take meaningful steps to roll back energy consumption and the extraction and use of fossil fuels because climate change is the single most pressing issue facing our WA Coastlines today. Our MSP should strive for a structure that minimizes our carbon footprint so as to reduce critical consequences – rising sea levels, erratic weather storms, droughts, etc.

Signature: Taylor K. Wonhoff

Date: 9/21/13

Name: Nemesia Herzstein

Email: nherzstein@gmail.com

Address: 7618 Greenwood Ave N
Seattle WA 98103

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- Further Comments:

Signature

Sept 21, 2013
Date

Name: Joel Banslaben

Email: joel.banslaben@gmail.com

Address: 418 N. Baldwin Pl., Seattle WA 98103

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- Further Comments:

Signature

Sept 21, 2013

Date

Name: DELORES WILLIAMS
Email: delores1williams@sbcglobal.net

Address:

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- Further Comments:

Delores Williams
Signature

9/21/2013
Date

Name: Marty Webb

Email: webbkin@blarg.net

Address: 1215 N. 'K' St. Tacoma 98403

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- Further Comments:

Marty Webb
Signature

9/21/13
Date

Name: Michael Webb

Email: mikewebb@blarg.net

Address: 1215 North K St.
Tacoma, WA 98403

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Michael Webb
Signature

9/21/13
Date