

CMSP Comments:

We have been working on this for 10 years. Pacific County is the 4th most marine dependent county in the country.

Top things to comment on

1. Protect and Preserve Existing Sustainable Use including fishing JOBS for Current and Future Generations

2. Rules and Protection should extend out from the 3 miles to 200 miles. The 3 miles is considered state waters and the Coastal Marine Spatial Planning (CMSP) is covering only the 3 miles. The Coastal Zone Management Act is the federal Line(CZMA) and is the 200 miles. The Shoreline Management Plan (SMP) that the county just finished but should be approved shortly, ask to meet the 200 miles. This all goes back to being the 4th most marine dependent county in the country. Our fish vessels both recreational and commercial do not stop at 3 miles, sometime they must go out 150-200 to get tuna for example. WDFW has existing rules and regulations that allow the CMSP to extend out to the 200 CZMA. **In 2016 Pacific County Commissioner in a meeting with DOE, directed DOE to use the WDFW Rules and Regulations to extend the CMSP out to the 200' miles to match with the federal CZMA.**

3. No Coastal Ocean Energy. This includes wave, tidal and wind. The best place that has been determined to place wind and wave energy is off the Pacific County Coast. These would be placed over our fishing and crabbing grounds. For example: a purposed plan at Coos Bay of 520 Single turbines will cover 520 square miles.

4. Why as an involved local group are you just now becoming aware of the CMSP? Where has the public involvement and outreach been?

RCW 43.143.060 (2) (b) - The protection and preservation of existing sustainable uses for current and future generations, including economic stakeholders reliant on marine waters to stabilize the vitality of the coastal economy.

Washington Coast's UNIQUE Blue Vision Strategy, community needs, Desired Big Picture OUTCOME

DO NO HARM

Protect and Preserve Existing Sustainable Use including fishing JOBS for Current and Future Generations

Washington Coast has UNIQUENESS found No Place else in the nation – Demands UNIQUE NO HARM CMSP

- Protect and Preserve public ACCESS to marine waters and fish including salmon
- Protect, Preserve, enhance public safety, health, and wellbeing – safeguard coastal quality of life
- Coastal PEOPLE MATTER – Cumulative Impacts accrue to REAL People – Coastal Wellbeing MATTERS

- History and Cumulative Impacts MATTER – 1st some, then more, then all JOBS lost over last 40 years
- Future impacts will be exponential & HISTORY MATTERS – cumulative unintended consequences
- UNIQUE 50% loss of fishing opportunity to honor federal obligations to tribal treaties
- UNIQUE result – 50% of Crab Fleet fishes in 9% of coast south of Klipsan Beach
- UNIQUE Highest fatality rate of any occupation in the nation in NW Dungeness crab
- Fish or Go Hungry in an increasingly dangerous debt ridden mid-winter crab fishery
- UNIQUE Unintended consequence –loss of vulnerable next generation young high-debt fishermen
- Needs LONG-TERM STABILITY and access to fishing grounds to prevent bankruptcy and failure
- Return Healthy Wild Salmon back to the people, ALL the people’s dinner plates; hatcheries required
- UNIQUE Washington has the highest Mass Weather Index in the nation – 130 - Neah Bay, 10 San Diego
- UNIQUE Olympic National Marine Sanctuary - No BOEM energy leases on 60% of the Washington Coast
- Portrays Washington values – no ocean energy retain sustainable fishing
- UNIQUE Industrial Scale ocean development is incompatible with tribal fishing rights – 70 % of coast
- UNIQUE in the nation – Federal Tribal Treaty Obligations demand UNIQUE Washington CMSP
- Only 38 miles of unencumbered coast = UNIQUE 4th most fish dependent community in nation
- Ports need tonnage to obtain USACE authorized dredging - requires commercial fish across the dock
- Prime recreational benefit of commercial fishing – access to fishing grounds through dredging
- Ocean industrial facilities are restricted navigation zones – RNA’s – No Fishing No Navigation Zones
- Fukushima Lesson – some industrial development does not belong in the coastal zone
- Recognize that ocean industrialization has not made any “to do” list of any public process in Washington

- Recognize that ocean energy is in its infancy and is currently not a missed opportunity or need
- Footprint MATTERS New emerging use – prohibit inefficient devices as too area/kW intensive
- Industrial scale footprint requires hundreds and hundreds of square miles of ocean
- Maximum area needs to be established
- Need clear threshold analysis criteria for new use denial or acceptance
- Need to number GLD map hexagons for easy public reference
- Fishing Industry still needs to review & buy off on all the GLD fishing maps – High, Med, Low application
- Prohibit ocean industrialization where RISKS exceed realizable benefits which are always over promised
- Review European experience – very high costs – Germany \$0.40/kW – WA. \$0.075
- Recognize that if you like your cheap electricity you can keep it with better land based alternatives
- No Trash Left Behind – realistic rehabilitation BONDING for new use (\$2 billion to raise the Costa Concordia)
- Preservation of Working Waterfronts
- Channel Dredging or the rest is immaterial PEOPLE MATTER! - so do their JOBS
- Oil Spill Prevention = Escort Tugs and required double-hauled
- Invasive, nuisance species, pollution, & reasonable controls are necessary
- Coastal Erosion – Shoreline maintenance – address hotspots – direct beach placement of sediments
- Recognize that marine science is in its infancy, “Best Science Available” often not satisfactory for decision making
- Pacific County SMP = broad prohibition on fixed structures in the Coastal Ocean
- Assemble local & state guidelines for Coastal Zone Consistency determination of new uses and review

Defining a problem is much easier than delivering no harm solutions that must not come at coastal expense

Lack of ownership = #1 reason plans FAIL, coast MUST own plan OUTCOMES & address coastal NEEDS

In the GH oil Terminal case which we turned around to a major win on ORMA – 9 – 0 Decision = Agencies primary duty is to ascertain and carry out the intent of the legislature – the SOC has refused to map ocean area the legislature intended – the intent was to map valuable fishing area and place ocean energy or other new use in areas of the ocean that AVOIDED CONFLICT with existing uses like fishing, there is NO map in the Plan that accomplishes that directive with minimal impact on fishing – the SOC Plan is a cover up of the real facts which they did not want to put before the public. Remember, of all the public meetings ocean energy was not even once mentioned as a preferred use of the ocean, not once. Sound bites deep pushing “stuff” uphill as the FACTS are ignored.

Other CMSP Comments:

I have other concerns with the CMSP Plan and WCMAC. I know most of these you have heard from me before, but I will continue to repeat them.

1. The “Email Listserve”-Myself and several other members of the public people are on the list serve, but never get any information about WCMAC unless a WCMAC member forwards it to us.
2. The lack of public involvement with the entire CMSP process is been very limited. The “Draft CMSP” plan does not provide any time for public review. In fact I haven’t seen any timeline for the plan. Just going out to the WCMAC, does not even come close to be able to say the public reviewed it. It needs to be sent out to the General Public. At a minimum it should be given a 90 day public comment period, just like any other DOE plans and permits (For example SMP plans).
3. The maps are still not very accurate in many areas. For example the fishing and crabs areas, the uses of Grays Harbor and Willapa Bay (should not just be listed as valuable).
4. I don’t think the entire economic value of our Marine Resources or the impacts to the whole coastal economy has been captured very well. For example: it should not just be based on fish caught, but everything and every job it took to catch and eventually use/eat that fish. Things like boat repairs, restaurants, nets, tourism, fish licensing, deck hands, etc.
5. I fully support making our WDFW Fishing and Crabbing Rules and Regulations (State Authority) part of the “Enforceable Acts” in our Washington State Coastal Zone Management Program. In addition after our WDFW Fishing and Crabbing Rules and Regulations (State Authority) have become an Enforceable Act, I fully support a “Geographic Location Description” be developed. This would allow our Pacific County SMP rules to meet the 200 mile CZMA line. We the public have asked countless times to have the CMSP authority extended out to the CMZA line. Pacific County Commissioner Frank Wolf also suggested this at the meeting on 1/13/2016 with DOE, and NOAA.
6. I support the prohibition of any fixed/permanent structures, within Pacific County SMP/CMZA waters. Ocean energy is simply not cost effective, invades upon existing sustainable uses and jobs. Why not look more into solar power or land wind turbines?

7. We have had to repeatedly ask/fight for “existing sustainable uses” to be included in the plan. Somehow it keeps getting omitted, thanks to a Surfrider petition this wording got put back into the draft CMSP plan.

There is no pat answer, all kinds of ocean energy devices, however, Oregon permitted ocean energy – OPT & Principle Power offer two ends of the spectrum

I like to give 1 Bonneville Dam output as equivalent – using much less for a major source of reliable energy is useless to help with future Washington energy needs

Public also needs to understand the real costs to their pocket books, not just ideology of carbon is BAD at any cost

OPT wave energy power buoys = 1 Bonneville Dam = 7300 individual buoys = approximately 2400 square miles

Principle Power at Coos Bay = 1 Bonneville Dam = 520 individual turbines = approximately 520 square miles

Land mass of Pacific County 933 square miles = NO fishing offshore Washington if even 1 Bonneville Dam of electricity is the expected outcome of an offshore ocean energy facility that amounts to any electrical production at all is the bottom line. Remember the legislature sent Burt Hamner & his Grays Harbor Ocean Energy packing for their outlandish proposal – this spurred the legislature to initiate CMSP to protect and preserve fishing, avoid conflict with fishing, and allow new use that only had minimal impact on fishing. SOC not even close to carrying out intent of the legislature which the Washington Supreme Court told them to do with ORMA, all CMSP is legislated under ORMA and needs to be applied as the legislature and the Supreme Court directed the agencies to carry out.

No projection on OPT costs top public – afraid of public outcry.

Principle power initial cost is approximately \$225,000/household served – try that on for a power hookup fee, this does not include annual maintenance costs, etc.

PP = approximately \$450 million installed for 30 MW production

Oregon refused Power Purchase Agreement when faced with the honest numbers & costs

Allah Weinstein, Principle in Principle Power is on her 5th, yes 5th ocean energy company and getting very rich pitching ocean energy, she is now in California Trident Wind – Allah rich, taxpayer poor is the real story and the SOC absolutely refused to put these FACTS into the Washington CMSP. I tried for over 2 years to get the SOC to include area/cost of ocean energy, they refused knowing the numbers were astounding and the public outcry would be enormous. That makes the entire Washington CMSP document a fraud; keeping these important FACTS covered in obscurity is not being honest with the taxpaying or ratepaying public.

The visuals overpower the rhetoric, Pugetropolis will view the ocean energy maps and jump all over it, the rest won't matter.

The website is extremely difficult to use, even to find where you can make comments is difficult and finding the plan was horrible.

There has been little public involvement, for example how does the Willapa Bay Resistance, which is a very intelligent, very involved, and very aware of issues facing Pacific County, not know about the plan until they read comments are due December 12, 2017 in the Chinook Observer from the article that came out November 15, 2017.

This is being completely pushed upon us from DOE and DNR. They haven't listen to us at all from the very beginning It definitely a very heavy handed, top down approach. It makes me sick to know how much money has been wasted on this plan.