

# Albert Carter

## Comments on the MSP:

My name is Al Carter. I am the safety and compliance manager at Ocean Gold Seafoods Inc. I am a former Grays Harbor County commissioner having served two terms from 2003 until 2010. I hold a seat on the Pacific Fisheries Management Council subcommittee, (Coastal Pelagic Species Advisory Subpanel) and the US/Canada Whiting Treaty, (US Advisory Panel). I also help establish and hold a seat on the Grays Harbor Marine Resource Committee. I am also a member of the Coalition of Coastal Fisheries.

As a County Commissioner I served on the Governor's Ocean Policy Working Group. That group led to the formation of the Washington Coast Marine Advisory Council, (WCMAC).

First let me say that this is a huge undertaking and I am fully supportive of this endeavor. I do have several comments that I would like to have entered into the record.

Words have meaning and how things are presented in these documents show a bias toward Ocean Energy and new ocean uses and show a lack of priority for existing uses. There is literally no way that a new use will NOT interfere, eliminate or compete with existing uses.

What's in the plan? How to use the plan?

The draft plan provides:

Guidance for new ocean uses along Washington's Pacific coast, such as renewable energy projects and offshore aquaculture.

Baseline data on coastal uses and resources to capture current conditions and future trends.

Requirements and recommendations for evaluating new ocean uses through different phases of project review, consistent with existing laws and regulations.

Recommendations to protect important and sensitive ecological areas and existing uses like fishing.

Words have meaning. First sentence gives the priority of ocean uses to new uses. Why is a non-existent use (Ocean Energy) given the top spot in this report? This is an industry that does not exist, at all. Fishing, (shown as the fourth item in this list) is regulated to the bottom. This shows a complete bias towards a speculative use that could alter the landscape for existing uses by precluding them from being used in areas where Ocean Energy would be placed.

This needs to be changed and existing uses **MUST** be given the priority that it deserves. Existing jobs, the existing culture of our coastal communities, the existing lives of working people and current industry **MUST** be given priority over highly speculative and non-proven technologies.

There is no infrastructure for bringing ocean energy to the coastline. There is no infrastructure for taking the newly created energy and distributing it to the existing grid or put into use for any purpose.

Existing industries and jobs and communities **MUST** be given the priority of ocean use above anything new that would interfere or eliminate existing uses.

## The Marine Spatial Plan Study Area:

The MSP Study Area consists of marine waters of the Pacific Ocean adjacent to Washington's Coastline from the intertidal zone out to the continental slope. It extends from ordinary high water on the shoreward side out to a water depth of 700 fathoms (4,200 feet) offshore and from Cape Flattery on the north of the Olympic Peninsula south to Cape Disappointment at the Mouth of the Columbia River. The Study Area includes two large estuaries: Grays Harbor and Willapa Bay. It covers approximately 480 nautical miles of coastline and spans 5,839 square nautical

miles (7,732 square statute miles).

Washington has the shortest coastline of all three coastal states at 136 nautical miles, and that vast areas, over 4000 square miles, are under co-management with coastal Indian tribes. The MSP area also includes 2408 square miles under marine sanctuary guide lines and large areas of military operating zones. These documents, as presented, do not adequately describe or reflect in the text, or in the narrative, that these existing spatial limitations exist. Nor do they describe the expected impact on space available for any potential new use.

Any new use, (Ocean Energy always seems to be the new use that is discussed), will not be allowed into to the 4000 square miles that are currently under some kind of guide lines for existing use, (i.e.; coastal tribes, military or the marine sanctuary). That will leave only the area that is not under these guide lines to be the areas that will allow Ocean Energy devices. These devices, based on their own information, can take up to a square mile each. So that will leave only 3732 square miles, (the most critical areas for commercial fishing and sometimes the only areas available in Washington for existing fishing, as the only space available for these new uses.

What happens when a new use pushes into and interferes with or eliminates an existing use? How are those conflicts measured? Without have a priority set for existing uses the new uses will become the flavor of the day and push out uses that don't fit with the new owner's profit margins and can be viewed as just something that is in the way of their future projects. Too often when new uses are put to the test they push out or compete for existing space. Each use should be given its due, but not to the extent that existing lives and communities will be put at risk.

The move to set aside ocean space for an industry that doesn't exist, has not been tested to see if it is even feasible off the coast is very premature. Remember that this is a very dynamic ocean and is very violent and disruptive to any uses place in it.

Before any space should be considered for Ocean Energy, exhaustive testing and actual on the ocean trials of equipment should be done to see if these projects are even feasible.

#### Overarching Goal:

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.

This comment really says it all and shows that the plan has given thought to how to keep and maintain our healthy marine ecosystem.

More emphasis needs to be given to local communities and the economic impact of new uses upon the existing jobs and the economies and cultures of these communities.

The maps in this plan do not show the minimal conflict/ adverse impact areas with existing uses as the legislature intended. More should be shown that describes the impacts of these new uses on existing uses.

Any project should that would displace an existing use should show how it will maximize the space available for jobs, benefits to coastal communities and to the state of Washington.

We have the last areas of undeveloped coastal line left in the continental United States. We must be extremely careful how we move forward in the future with the uses that will be placed in our ocean. The Washington CMSP and the EIS needs to fulfill the legislative intent to Protect and Preserve fishing, map all existing uses, and establish "if" there is a viable NO conflict place available for new uses like Ocean Energy off the Washington coast. We should be able to determine how to have minimal adverse impact on fishing that AVOIDS HIGH VALUE FISHING GROUNDS and unique ecological areas. We can do better and should do better to value our existing uses and finds ways for

new uses and economic opportunities to be included.

All of this can be done, its harder to include everything and certainly takes more time. Time we have, resources are limited and once used up or destroyed that are certain to never return.

Thank you for the opportunity to comment.

Sincerely,

Albert A. Carter

315 Lawrence Drive

Hoquiam, WA 98550

360-581-3220

Alcarter55@gmail.co.