



December 12th, 2017

Jennifer Hennessey  
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Dear Mrs. Hennessey,

Thank you for the opportunity to provide public comment on the draft Marine Spatial Plan (MSP) for Washington State. The Surfrider Foundation has been involved in this process from the start and we are very pleased with the final product and all the hard work that has gone into getting it to this point. Before we get to specific comments regarding the plan, we would like to compliment the process that took nearly 7 years to complete. It was a relatively long process that required considerable stakeholder outreach and engagement, while there were some challenges early on, we feel that overall it was an impressive feat to complete a plan of this scale while ensuring robust participation with the public and various stakeholder groups. Over the years we witnessed the advisory body for this effort, the Washington Coast Marine Advisory Council (WCMAC), develop into a board with diverse representation that works very well together in a collaborative manor. We are optimistic that this progress will benefit coastal communities as the WCMAC transitions to other import issues such as coastal resiliency.

### **General Comments**

One of the main objectives for MSP is the consolidation of numerous data sets relating to ocean resources and the various uses that occur in the marine environment. We can confidently state that objective was achieved. The data viewer has a significant amount of information, from recreational use maps, to fisheries effort, to various habitat types, that is now available to anyone. We feel that this is a tremendous outcome and a great value to researchers, ocean users, and the general public.

The Marine Spatial Plan is an amazing reference that will be useful for any individual or organization that is interested in conservation and stewardship of Washington's coastal ecosystems, communities, and history. Simply put, we now have more information of a higher quality than any time in Washington's history, and that will only help improve our stewardship and management decisions moving forward.

After reviewing the entire draft MSP, we are very pleased with the level of exhaustive description and analysis. The State and WCMAC have clearly invested significant time and energy into this plan and it shows. The guidelines and process for potential new uses in Washington State waters is clearly articulated while providing adequate protection to existing uses. It is our opinion that Washington's Marine Spatial Plan has set a new standard for other states and countries to follow.

While renewable ocean energy has often been seen as a driver for completing this planning process, the paragraph bellow perhaps captures most accurately the state of our knowledge of this potential new use given all that we know regarding existing uses as a result of completing this effort.

“Analyses produced for the MSP illustrate the large footprint required for projects designed to produce wind energy at a scale matching potential needs for renewable energy

in the regional power grid in the next 10-15 years (See Chapter 3 for details on analyses and findings). In state waters on Washington's Pacific coast, these analyses indicate that projects of this scale require large footprints that occupy a large proportion of the total area of state waters and intersect with many existing ocean uses and resources. Therefore, in state waters, industrial-scale renewable energy projects will likely have a very difficult time demonstrating that they can avoid significant adverse impacts to existing uses and resources. Community-scale renewable energy facilities proposed for state waters may find it easier to demonstrate consistency with state policies, plans, and authorities through existing permitting processes." P 4-25

Our specific comments on the plan are fairly limited, mainly because we have had ample input on this plan through our participation on the WCMAC and provided numerous suggestions when a preliminary draft was shared with WCMAC members in earlier this year. Most of our comments were addressed and if they were not, the reasoning was explained at the May WCMAC meeting. As these are already part of the public record we will not repeat them here. We appreciate that our prior comments were considered and most of them well addressed in the current draft plan.

Speaking specifically to the DEIS, we support the preferred alternative. As a result of this planning process, clearly in this day and age, it makes more sense to have a plan that can help to inform management decisions moving forward. Given that any potential future interest for developing larger, industrial scale projects will likely be more interested in federal waters offshore (>3 nautical miles), completion of this plan and the subsequent adoption as part of the Washington Coastal Management Plan is a very important part of the State of Washington asserting its interest in any future decision making that may occur in federal waters. "Under the federal Coastal Zone Management Act (CZMA), the "federal consistency" provision gives a coastal state a strong voice that it would not otherwise have in federal agency decision-making for activities that may affect the coastal uses or resources of a state's coastal zone. Generally, federal consistency requires that federal actions, within and outside the coastal zone, which have reasonably foreseeable effects on any coastal use (land or water) or natural resource of the coastal zone be consistent with the enforceable policies of a state's federally- approved Coastal Zone Management Program (CZMP)."

### **Specific Comments**

Section 1.5, pg 1-13

Recommend naming the five national wildlife refuges that are in the MSP Study Area.

Section 2.1, pg 2-6; Section 2.1, pg 2-7

Recommend spelling out Pacific Northwest instead of using PNW in the second to last paragraph.

Section 2.1, pg 2-7

The description of "the Blob" gives the impression that it is a regularly occurring phenomenon, similar to ENSO and PDO. Recommend language describing it as an anomaly, although a caveat could be included that shifting climate patterns might provide conditions to see similar events in the future. This is articulated in the Climate Change section (2.11) but not here.

Section 2.6, pg 2-136

More accurately, the Clean Water Classic is held in the late September to early October timeframe.

Section 2.7 pg 2-142-158

These sections don't seem to reflect the WA Supreme Court Decision regarding ORMA from early 2017, nor do they reflect the recent Energy Facility Site Evaluation Council recommendation

regarding Tesoro-Savage Oil Terminal in Vancouver. A slight update based upon the final decision from Governor Inslee should be included prior to final submission of the Plan to NOAA.

### Section 3.3

This section has considerable more detail about the methods and limitations of the Marxan spatial analysis compared with the earlier draft we reviewed. We very much appreciate this improvement as it conveys the complexities of Marxan and clearly articulates the high potential for use conflicts, even for areas that Marxan has identified as a “best solution.”

### Section 4.2.1 (4.c) & (5.b)

Second paragraph begins with unclear language: “The meeting shall be necessary data.....” Please clarify.

### Appendix C, Recreation and Tourism Data Table

Remove “331” from Recreational Study Map Reference.

In conclusion, thank you again for the opportunity to provide public comment on the draft plan and for the leadership and inclusiveness of the Ocean Caucus agencies throughout the planning process. We look forward to working with the agencies and the Washington Coastal Marine Advisory Council in the months and years ahead to advance implementation of the plan and continue to address any data gaps.

Sincerely,

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