The Nature Conservancy

To whom it may concern,

We would like to congratulate the Washington Coastal Marine Advisory Council and the Department of Ecology for successfully drafting Washington's first Marine Spatial Plan.

The Nature Conservancy began working on Marine Spatial Planning (MSP) in 2008 by assisting in the development of draft MSP legislation that would later become law. Since then, the Conservancy has remained involved in MSP by assisting in stakeholder engagement and outreach, developing and piloting data visualization tools, reviewing ecological data, and supporting the WCMAC chair. Conservancy staff have also attended most WCMAC meetings to observe and provide public comment. We have provided detailed comments on earlier drafts of the plan and are pleased to see our suggestions incorporated in the current draft. Please note our additional, minor comments on the draft plan at the end of this letter.

The Conservancy would like to highlight one element of our engagement in MSP. We consider the Ecologically Important Areas (EIA) delineation key for determining where development could potentially adversely impact the marine ecosystem. Accordingly, Conservancy staff undertook an assessment of the EIA relative to a similar assessment done by the Conservancy in 2013 (Pacific Northwest Marine Ecoregional Assessment). The full report of our comparison of the two analyses will be available online at WashingtonNature.og in coming months, along with a presentation by Conservancy staff to the WCMAC in May 2017. While the two analytical approaches differ, they both develop a feasible framework for mapping the complicated biodiversity off the Washington coast. However, because data quality is poor in our Washington waters, and we strongly encourage agencies and other organizations to develop a plan for generating new science to fill the identified gaps. In this plan, we advocate for a focus on how climate change will affect species quantity and distribution and how species utilize the Study Area over time (through seasons and their own life cycles).

Additionally, future versions of the MSP will benefit from explicit consideration of how the MSP ties in with plans in adjacent areas (e.g., Oregon, California, British Columbia). There is increasing evidence in the literature that planning to the size of the ecosystem and its processes translates to better conservation and management outcomes. This need to plan to appropriate scale is heightened by effects of climate change and ocean acidification, that are already affecting Washington's marine resources. Regional and transboundary management decisions become especially relevant in fisheries, where the resource may be moving in and out of the study area depending on the time of year. As fish stocks move, interoperability of management systems across borders may become necessary for effective and equitable resource benefits. Working together from a zoomed-out perspective will likely enable more successful accomplishment of the desired conservation outcomes for the plan.

Please contact us with any questions.

Sincerely,

Jodie Toft - Senior Marine Scientist
Garrett Dalan - Washington Coast Community Relationship Manager
Molly Bogeberg - Marine Conservation Coordinator

ADDITIONAL COMMENTS

1.4 Planning Process Summary

Add text to the Coastal Marine Resource Committees section (p. 1-9) to indicate that state planning staff presented to MRCs on MSP at the MRC Summit in November 2017.

2.3 Socioeconomic Setting

Reference the follow two efforts in the Coastal Hazards and Community Vulnerability, beginning on page 2-73:

• Ruckelshaus Center Report, "Washington State Coastal Resilience Assessment Final Report. "

• Sea level rise is another coastal hazard that is affecting community vulnerability along the outer coast. The Washington Coastal Resilience Project is working to refine sea level rise projections and integrate projections into local planning processes and capital funding projects.

Reference the Washington Coast Works Sustainable Small- Business Competition in the Future Trends section (p. 2-77), as it is an example of "coastal communities identifying many opportunities for socioeconomic growth for an economically sustainable future"

3.3 Use Analysis

A better understanding of the economics of various human uses, like fishing, would contribute to a more robust use analysis. For instance, in Washington State a tension emerged between high value fisheries (e.g. shellfish) and lower-value fisheries (e.g. hake) in terms of highlighting intensity of fishing in an area. As it stands, one high-value fishery in each area is valued lower than a corresponding combination of lower-value fisheries in terms of ex-vessel value. This is concerning to many Washington Dungeness crab fishermen, who may only fish one species in a specific area, while attaining most of their value in turn. Stakeholders want to be sure their uses are taken seriously, and more robust economic information that shows more detail in the spatial outputs could help alleviate some of their concerns.

*Please see attachment for official letter with references.

The Nature Conservancy
Washington

December 12, 2017

Re: public comment on Draft Marine Spatial Plan for Washington's Pacific Coast

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[1] https://www.conservationgateway.org/ConservationPlanning/SettingPriorities/EcoregionalReports/Documents/PNW%20Marine%20EA%20Report%202013.pdf

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[2] http://ruckelshauscenter.wsu.edu/wp-content/uploads/2013/06/Executive-Summary_Washington-Coast-Resilience-Assessment-Report_Final_5.1.17.pdf
[3] http://www.wacoastalnetwork.com/washington-coastal-resilience-project.html
[4] http://wacoastworks.org/

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