

Action Agenda Comment and Response Summary

May 2009

Prepared by:

PugetSoundPartnership
our sound, our community, our chance

and

 **EnviroIssues**

Action Agenda Comment and Response Summary

On November 6, 2008, the Puget Sound Partnership released a draft Action Agenda for a two-week public review period. During this time, more than 1,000 comments were received from public agencies, associations and community groups, water groups, business and environmental interests, and individual citizens. Many of the comment submittals were more than 10 pages in length and included more than 20 individual comments on specific items in the Action Agenda.

Attached is a high level comment summary that highlights overarching themes in comments received on the draft Action Agenda, as well as comments on specific issues that may have been raised by a number of commenters. The comment summary reflects the diverse opinions that were often expressed about given topics, and how those comments may or may not have been incorporated into the Action Agenda approved on December 1, 2008.

Overarching themes in comments on the draft Action Agenda included:

- The majority of the comments re-emphasized the strategic priorities and affirmed the near-term actions from the perspective of the commenter.
- A wide range of agencies and groups expressed their appreciation and support for the Puget Sound Action Agenda, including affirmation of the actions identified. Many said that they were ready and willing to work collaboratively with the Partnership and other implementers to improve the ecosystem. This expertise will be needed.
- Specific aspects of the Action Agenda that need refinement were identified, including: specific indicators of ecosystem health; ecosystem targets and benchmarks; better links between goals, indicators, and actions; more detail on overall accountability, costs, and funding strategy; and the need to prioritize actions and identify a work plan for moving forward. This information is better described in the final Action Agenda, including next steps to improve each of these areas. Many of the comments pertaining to specific indicators and use of indices will be immediately used in the next steps to advance this work.
- There were suggestions that the Partnership summarize the areas of focus in the Action Agenda and elaborate on which of areas should be emphasized. A section was added to the Introduction to address this need.
- Numerous technical corrections and clarifications were submitted, as well as refinements to actions and strategies. References, a glossary, and a table of contents were requested. Many clarifications were made as time permitted, including a key references section, glossary, and table of contents.
- Some commenters requested specific details of near-term actions and requested that they help build and shape new ideas. Many of these comments are beyond the level of detail in the Action Agenda. All of the near-term actions need specific work plans for implementation, and input and assistance is needed and welcomed to develop these plans.
- There was a lack of consensus among commenters on certain issues, particularly the need for additional enforcement and use of incentives. Both needs are reflected in the Action Agenda.

An additional 30-day review of the Action Agenda was conducted in March and April 2009 to allow more time for comments, re-consideration of the November comments, and to meet requirements for the National Estuary Program. An additional 30 comments were received during the 2009 comment period. These comments are included in a second comment summary (attached). Themes that emerged from the second review included:

- Requests for further clarification of the process and timeline for developing the performance management system including targets and benchmarks.
- Support for more clear and transparent governance and decision-making processes.
- Additional clarification on the role of the Partnership and Salmon Recovery Council.
- A more thorough description of some partner organizations, notably tribes and local governments, and information flows within the Partnership and with external organizations.
- Support for inclusiveness and extensive public involvement and implementation and decision-making.
- Minor technical corrections such as the names of programs, as well as comments that may not have been satisfactorily addressed in November.

The May 2009 update to the Action Agenda reflects the additions of the supplementary material and related comments. This information is primarily in new appendices. The updated Action Agenda also reflects minor corrections and clarifications that were not included in the December 1, 2008 version.

During both review periods, commenters suggested broad categories of ideas that need further consideration in the future. The Partnership will consider these suggestions as the Action Agenda is implemented and revised in the future. These actions are in four broad categories:

- Concerns that need to be addressed as individual near-term actions are developed and sequenced (e.g., a water quality trading program, restrictions on bulkheading in the marine nearshore, and establishing a no-discharge zone, rapid community assessment following the watershed characterizations).
- Critical and emerging issues that need future attention. Some of the policy ideas need detailed discussion with implementers and others point to concerns that could not be fully addressed in the timeframe of preparing and beginning to implement the Action Agenda. Examples include, but are not limited to:
 - Long-term strategies for growth, protection of local watersheds, sustaining working lands with specific incentives, retaining a viable economy while changing the way our society grows and develops, and protection roles of local and state government.
 - More refinement on defining human well-being for the region and including social equity and justice, including engagement of citizens not traditionally part of environmental protection and restoration.
 - More specific detail on climate change and adaptation strategies as these are developed, and ways to leverage actions to better prepare the region for a changing climate.

- Ocean acidification.
- Comments that are beyond the immediate scope and timeframe of the Action Agenda and/or comments that need investigation as to their effectiveness. Examples include accelerating update schedules for policy and regulatory updates, changing the way the water bodies are listed under the U.S. Clean Water Act, changing the composition of the Science Panel, developing native shellfish hatcheries, and a detailed discussion of all federal, state and local programs that contribute to Puget Sound recovery to better leverage this work and improve efficiency and effectiveness.
- Comments for consideration for future versions of the Action Agenda and updates to near-term work priorities.
 - Additional funding strategies and costs to and for human well-being related to housing and business interests.
 - More balance of actions between upland and freshwater parts of Puget Sound and the marine areas, and the links between them.
 - More treatment of groundwater resources and their relationship to surface water and pollutant loading.
 - Resolution of the requirement for species by species recovery planning and implementation and the need for more holistic ecosystem recovery.
 - Specific programs and projects that implementers believe should be highlighted and supported. The Action Agenda is intended to identify the most important projects; however, as implementation occurs and more is understood about the importance of individual actions, near-term actions will need to be adjusted. In addition, as the performance management system is developed, more actions and implementers can be specifically identified.

The Partnership also received ideas and suggestions that were not included in the Action Agenda or update. As a group, they do not reflect current scientific thinking, are factually inaccurate, are in conflict with the Partnership's goals for a healthy ecosystem that includes humans and natural systems, focus blame on particular stakeholders, are too vague to understand the commenter's intent, or are very general. Examples of these comments include encouraging people to move away from Puget Sound to other areas of Washington State or the country, promoting sea lion birth control, building underwater reefs, disputing the current published findings of state and federal agencies, and changing the charge of the Partnership.

A thematic comment and response summary follows the complete list of commenters. As much as possible, the comments are grouped by theme related to each question of the Action Agenda. The response column indicates how the comment was addressed. Citizen commenters are too numerous to list for each theme and are simply represented as citizen.

Commenters during November 2008 comment period

Organizations and Agencies

American Rivers
American Whitewater
Association of Washington Business (AWB)
Association of Washington Cities (AWC)
Boeing
BP Cherry Point Refinery
Building Industry Association of Washington (BIAW)
Cascade Land Conservancy (CLC)
Center for Environmental Law and Policy (CELP)
Chimacum Grange
City of Bainbridge Island
City of Bellevue
City of Bremerton
City of Everett
City of Everett (Planning Dept.)
City of Gig Harbor
City of Kent
City of Kirkland
City of Lake Stevens
City of Mill Creek
City of Normandy Park
City of Olympia
City of Port Angeles
City of Poulsbo
City of Redmond
City of Seattle
City of Shelton
City of Tacoma
City of Tumwater
Clallam County Marine Resources Committee
Coalition to Protect Puget Sound Habitat
Department of the Navy (Navy)
Ducks Unlimited
Environment Canada
Friends of the Earth
Futurewise
Herrera Environmental Consultants (Herrera)
Hood Canal Coordinating Council (HCCC)
Hood Canal Environmental Council (HCEC)
Jamestown S'Klallam Tribe

Jefferson County Marine Resources Committee (Jefferson Co. MRC)
King Conservation District
King County
King County Agriculture Commission
King County Medicine Return Program
King County Noxious Weed Control Board
King County Rural Forest Commission
Kitsap Alliance of Property Owners (KAPO)
Kitsap County Health District
Kitsap Home Builders Association
League of Women Voters of Washington (LWVWA)
Local Hazardous Waste Management Program
Lower Elwha Klallam Tribe
Lummi Natural Resources
Makah Tribal Council
Master Builders Association (MBA)
Metro King County Council
National Oceanic and Atmospheric Administration (NOAA)
National Wildlife Federation (NWF)
Nisqually Indian Tribe
North Cascades Conservation Council
North Olympic Peninsula Lead Entity (NOPLE)
North Olympic Salmon Coalition
Northwest Indian Fisheries Commission (NWIFC)
Northwest Natural Resource Group
Northwest Straits Commission
Oil Spill Advisory Council
Olympic Environmental Council
Orca Network
Pacific Coast Shellfish Growers Association (PCSGA)
Pacific Merchant Shipping Association (PMSA)
People for Puget Sound (PPS)
Pierce County
Point No Point Treaty Council
Port Gamble S'Klallam Tribe
Port of Port Angeles
Port of Seattle
Port of Silverdale
Preserve Our Islands
Puget Sound Endangered Species Act Business Coalition (PSESA Business Coalition)
Puget Sound Environmental Caucus
Puget Sound Monitoring Consortium
Puget Sound Regional Council (PSRC)

Puget Sound Restoration Fund
Puget Soundkeeper Alliance (PSA)
RE Sources for Sustainable Communities
Ronald Wastewater District
Salmon Recovery Council
San Juan County
San Juan County Council
San Juan Initiative
San Juan Islands Conservation District
Save a Valuable Environment (SAVE)
SeaDoc Society
Seattle Aquarium
Seattle Audubon Society
Seattle District Corps of Engineers (USCOE)
Shoreline Property Owners and Contractors Association (SPOCA)
Sierra Club
Skagit Conservation Education Alliance (SCEA)
Skagit County Planning & Development Services
Skagit Young Farmers
Snohomish County
Snoqualmie Watershed Forum
Squaxin Island Tribe
Starrfish Environmental Consulting
Stewardship Partners
Stillaguamish Tribe Natural Resources Department
Surfrider Foundation
Sustainable Living Institute
Swinomish Indian Tribal Community
Tacoma-Pierce County Health Department
Taylor Shellfish Farms
The Nature Conservancy (TNC)
Thurston County
Transportation Institute
Trust for Public Land (TPL)
Tulalip Tribes
University of Washington Climate Impacts Group (CIG)
US Environmental Protection Agency (EPA)
US Fish and Wildlife Service (USFWS)
US Forest Service (USFS)
US Geological Survey (USGS)
Vulcan
Washington Agricultural Institute
Washington Citizens for Resource Conservation

Washington Council of Trout Unlimited
 Washington Environmental Council (WEC)
 Washington Forest Protection Association (WFPA)
 Washington Policy Center
 Washington Public Ports Association (WPPA)
 Washington Realtors
 Washington Sea Grant (WSG)
 Washington State Association of Counties (WSAC)
 Washington State Association of Local Public Health Officials
 Washington State Conservation Commission (WCC)
 Washington State Department of Agriculture (WSDA)
 Washington State Department of Community, Trade and Economic Development (CTED)
 Washington State Department of Ecology (Ecology)
 Washington State Department of Fish and Wildlife (DFW)
 Washington State Department of Health (DOH)
 Washington State Department of Natural Resources (DNR)
 Washington State Department of Transportation (WSDOT)
 Washington State Environmental Health Directors (WSEHD)
 Washington State Noxious Weed Control Board (WSNWCB)
 Washington State Recreation and Conservation Office (RCO)
 Washington State University Extension (WSU Extension)
 Waterfront Construction
 Western States Petroleum Association (WSPA)
 Whale Museum
 Whatcom County Public Works
 Whidbey Watershed Stewards
 Wild Fish Conservancy
 Worldwide Water
 WRIA 16 Planning Unit
 WRIA 17 Planning Unit

Citizens

David Abbot	Lynn Allen
Janice Absher	Paul J Allen
Julie Acevedo	Kerri Altom
Bob Aegerter	Alex Amonette
Vance Aeschleman	Melissa Amrhein
Shelley Alan	Paul Ancich
Dan Alexander	Diane Anderson
Glen Alexander	Chris Andree
Sharon Allbright	Susan Andrews
Eric Allen	Shanna Angel
Kathleen Allen	Bryony Angell

Anne Foster Angelou
Bill Angle
Cheryl Angle
Tom Armentrout
Todd Arnold
Dee Arntz
Erin Ashe
Rein Attemann
Donna Auer
Shane Austin
Frank Backus
Frances Badgett
Sean Bailey
Ken Bajema
Barney Baker
Nadja Baker
Arian Balkan
Jack Barbash
Edward Barnes
Nikki Barnes
Chase Barton
Peter Beaulieu
Susan Bechtholt
Cindy Beckett
Mike Beegle
GayLynn Beighton
Mark Beisse
Lola Bennington
Irene Bensinger
Patricia Berezcki
Colleen Berg
Kimball Bergerud
Richard Bergner
Sharon Bergquist-Moody
Arno Bergstrom
Marilyn Berko
M Berry
Sheila Berry
Lucille Bertuccio
Victoria Beschenbossel
Heidi Betcher
Thomas Bettinger
Linda Bishop

Jennifer Black
Elizabeth Blair
Brady Blake
Seana Blake
Mark Blitzer
Gregg Blomberg
Kevin Bodle
Janet Boge
Marlen Boivin
Barb Bonner
Seth Book
Derek Booth
Harold Boswell
Thomas Bougher
Celia Bowker
Dave Boyd
Ronald Boyer
Laura Leigh Brakke
Harry Branch
Jill Brandenberger
Lynn Brevig
Julie Briselden
Hilary Bromberg
Lennon Bronsema
John Brooks
Shad Brooks
Robin Brower
Steven Brown
Ann Browning
Mary Bruce-Wright
Tom Brush
Kathryn Bubelis
Julius Budos
Scott Burbidge
Karolyn Burdick
C Burkhead
R Burkhead
Bob Burkle
Gerald Burnett
Sally Burtscher
Anna Butterfield
Christopher Cady
Robert Canamar

Lesley Canfield
James Carlson
Ken Carrasco
Anne Caughlan
Georgina Cavendish
Loren Ceder
Susan Chadd
Kelley Chaddock
John Chaney
Lois Charles
Joe Chasse
Lela Chavez
Owen Cheevers
Sarah Chessman
Susan Chiat
Neil Chrisman
Kimberly Christensen
Julie Christoph
Benjamin Cody
Lori Coletti
William Collins
Stephanie Colony
Jeff Compton
Mike Conlan
Patricia Connell
Rebecca Connors
Jennifer Cordsen
Tamara Cowles
Allen Cox
Emily Crandall
Al Craney
Amanda Creager
Cynthia Creel
Dulane Crist
Steven Cristol
Carolyn Crombie
Connie Crosby
Cara Cruickshank
Erica Crytzer
Herbert Curl, Jr
Russell Daggatt
Judy D'Amore
Marc Daniel

John D'Antoni
Viana Daven
Barbara Davidson
Anna Davis
Galen Davis
Rose De Dan
Nancy Dean
Jeanne Deller
Della Demerjian
Dylan DePaulo
Tom Des Brisay
Stephanie Develle
Shelley Dillon
Dan and Sharon Dodge
Eric Dolpin
Peter Domoto
Robin and Tom Donnelly
Alison Doyle
Steven Drevecky
Carolann Driver
Rene Dubay
Suzanne Duley
Logan Dunphy
Randy Dutton
Jackie Easley
Ronald Eber
Keith Edgerton
Stephanie Edwards
Chris Eggen
Claire Egtvedt
Susan Ehler
Maia Eisen
Stephen Ekholm
Sandra Elder
Laura Elflin
Christine Ellis
Scott Ellis
Richard Ellison
Christine Emmel
Helen Engle
Pamela Engler
Anne Engstrom
Sylvia Ericson

Dan Estabrook
Alice Evans
Joe Evans
John Evans
Susan Evans
Franklin Eventoff
Mark Everard
Jennifer Eveskcige
Stephen Ewall
Nicole Faghin
Anna Fahey
Patti Fairbanks
Adriana Faria
Andrea Faste
Jim Faulstich
Carol Faust
Daniel Feduff
Richard Feely
W Feguson
Alissa Ferrell
Malcolm Ferrier
Ellen Fillion
Sheree Fisher
Heather Flanigan
Gail Fligstein
Courtney Flora
Keith Folkerts
Mary Lou Francis
Andrea Frank
Polly Freeman
Rona Frimmer
Brian Frost
Bob Fuerstenberg
John Gagnon
Theresa Gandhi
Ray Gardner
Michael Garrity
Julie Garrod
Sam Garst
Lydia Garvey
Rochelle Gause
Dawn Gauthier
Helen Gebrenegus

Leslie Geller
Maria Gerrald
D Giles
Greg Gille
Tom Giske
Fred Giorgi
David Gladstone
Marie Gladwish
Jim Gleckler
Julia Glover
Marcia Glover
Marcy Golde
Eleanor Goodall
Erin Gordon
Slade Gorton
Joan Gould
S Gould
Sharon Grace
Jeremy Graham
Ruth Grant
Harrison Grathwohl
Marita Graube
Craig Green
Alex and Harvey Greenberg
Holly Greenspoon
Virginia Greenwood-Warner
Tom Gries
David Griffin
Mike Grijalva
David Grimes
Barbara Gross
Ravi Grover
Dave Groves
Bruce Gundersen
Barbara Guthrie
Brie Gyncild
Eliza Habegger
Stephanie Hagel
Bob Hager
Jennifer Hahn
Martha Hall
Daniel Halos
Willa Halperin

Holli Hamilton
Diana Hammer
Christie Hammond
Thomas Hammond
Cindy Hansen
Rick Harlan
Barb Harmon
Eric Harmon
Joan G Harris
Howard Harrison
Sylvia Hartman
Carolyn Hartt
Zena Hartung
Irene Hartzell
Laura Harvell-Spehar
Anne Harvey
Margie Hatter
Lorena Havens
Johnnie Hawkins
Jenny Hayes
Robert Hayes
BJ Hedahl
Dave Heger
George Heidorn
David Heimer
Rory Henneck
Bernadette Henzi
Wendy Hernandez
Joseph Herrin
Greg Herzberg
B Herzog
Judy Heydrick
David Heywood
Bobbi Hickox
Carolyn Higgins
Wade Higgins
Thomas Hildebrandt
Curtis Hinman
Rick Hirschberg
Amie Hirsche
Eric Hirst
Jennifer Hisrich
Nancy A (Nan) Hogan

Joyce Hoikka
C Holmes
T Holt
Tom Holz
Matthew Hornland
Derek Hoshiko
Jocelyne Houghton
Keith Houser
Brandon Houskeeper
Colleen Howe
M Howell
Robert Hrycenko
Laura Huddleston
Edward Hueneke
Jeff Hummel
Keith Hutchings
Lura Irish
Susy Irwin
Dean Jackson
Russell Jacobson
Gayle Janzen
Karen Jeffers
Edward Jennerich
Dean Jenniges
Diane Jensen
Craig Johnson
Jennifer Johnson
Kirby Johnson
Maile Johnson
Monica Johnson
Nancy Johnson
Tressa Johnson
David Jones
Jamie N. Jones
Robert Jones
Kathy Jubitz
Barbara Jurgens
Arden Kagetsu
Cathy Kail
Blair Kangley
Jason Kapchinske
Margaret Kaperick
Robert Kaplan

Cameron Karsten
Laura Keehan
Marcus Keeney
Maxine Keesling
Marcie Kever
Jourdan Keith
Jessica Kenney
Robert and Julia Kenny-Glover
Erica Kerwien
Jamal Khan
Carol Kibble
Caryolyn Kinch
Carolyn Kine
Carolyn King
Kas Kinkead
Richard Kirchhoff
Harry Kirchner
Mike Kirsch
Mary Ann Kirsling
Amy Kitchener
Zachary Klaja
Jesse Knight
Amber Knox
Janet Knox
Jacqueline Koch
Ty Kocher
Kees Kolff
Elise Koncsek
Matt Koppelman
Amy Kosche
Michael Kovacs
Dina Kovarik
Katherine Kozisek
Nancy Kreider
Melanie Kristoferson
Ellen Kritzman
Larry Laarson
Rose Lagerberg
Tai Lahans
John Lahti
Sue Lahti
Brad Lambert
Kathy Lange

Jane Larson
Judy Larson
Heidi Laursen
Gabriel Lavalle
Charles Lawson
Patricia Layden
Aja Leafe-Hall
Rae Deane Leatham
Wendy Leavitt
Shirley Leckman
Christine Lee
Marc Lee
Carolyn Leith
Sharon LeMire
Jennifer Lenhart
Brian Levin
Mark Levine
Mike Levine
Rachael Levine
Sharon LeVine
Peggy Leviton
Kathlyn Lew
Brenda Lewis
Lori Lewis
Nancy Lill
Dennis Linden
Krista Lindgren
Monica Lisafeld
Kevan Lisowski
Gillars Llaron
Bill Loeber
John Lombard
Sandra Lord
Lucy Lotto
Cheri Lovre
Ethan Y Lucas
Jeremy Lucas
Laura Lundgren
Brian Lutenegger
David Luxe
David Luxem
Kerry MacAndrew
June MacArthur

Joyce Major
Jimmy Malecki
Linda Mallin
Angela Manning
Margaret Manning
Kristine Mansfield
Robbie Mantooth
Heather Mar
Dan Marcus
Lisa Marcus
Andy Maris
James Maroncelli
David Marsh
Alex Martin
Jeffrey Martin
Melodie Martin
Hayley Martin-Hampton
Brice Maryman
Bernice Maslan
Dave Mason
Rob Masonis
Stephen Matera
Shawn McAllister
David McCaughey
Deirdre & Jay McCrary
BC McDonald
David McDonald
Jim McEntire
Allison McGinnis
Bryan McKinnon
Rachel McLellan
Mary McLoone
Ahlyshawndra Means
Jenny Mears
Jules Michel
Donna Mikula
Chris Miller
John Miller
Rosemary Mills
Michelle Minshall
Pete Modaff
Terry Montonye
Daniel Moore

Jesse Moore
Kirsten Moreno
Wm Moritz
Jeff Morris
Steve Morris
Mike Morrissey
Mary Beth Moser
Sylvia Moss
Shirley Mouer
Robert Mueller
Guila Muir
Wendy Mulhern
Ellen Murphy
Gary Murrow
Patrick Nash
Daine Nash-McFeron
Sally Neary
Alyse Nelson
Edith Loyer Nelson
Jennifer Nelson
Joseph Nelson
Julia Nelson
Richard Nerf
Theresa Neylon
Donna J. Nickerson
Ariana Nicoli
Lisa Niehaus
Wendy Noritake
Donald Norman
Brita Norvold
Tim Nuse
Terry Nussdorfer
Kristofer Nystrom
Michael O'Brien
Tarin O'Brien
Erin Ocegueda
Dan O'Keefe
Thomas O'Keefe
Sue Oliver
Carl Olsen
Lynne Olson
Janet O'Neil
Katie Opitz

Laura Ormsby
Steffanie Ostrowski
Karalynn Ott
Tracy Ouellette
Mark Overland
Barbara Owens
Gordon Padelford
Chris Page
Libby Palmer
Madya Panfilio
Adrienne Papermaster
Ben Park
Jeannie Park
Stan Parker
Sandra Parker-Stetter
Dave Parks
Geov Parrish
Stephanie Parrott
Tamara Parrott
Sharon Parshall
Melissa Parson
Donna Passmore
David Pater
Jean Pauley
Bradley Pavlik
Vernon Pearia
Herb Pearse
Mary Pease
Webster Peirce
Kim Pendergrass
Dennis Pennell
Sarah Perkins
Andrea Perry
Matthew Peters
Thom Peters
John Petersen
Beverlee Peterson
Peggy Peterson
Christina Petrie
Judy Pickens
B.A. Pieplow-Galeu
Judy Pigott
Kathryn Piland

Deborah Platz
Allen Pleus
Mark L. Plummer
Phalla Pol
Pat Porter
Randall Post
Dorothy Potts
Mark Powell
Linda Powers
Karen Price
Kathy Prince
Pam Pritzl
Curt Puddicombe
Steven Puddicombe
Tom Quinn
Michael Racine
Darcy Rae
Mary Anne Rangel-Guerrero
Sandra Ray
Genevieve Raymond
Susanne Raymond
Peter Reiquam
Cat Reny
Leah Reuben-Werner
Elisabeth Revell
Cathy Reynolds
Lisa Reynolds
Casey Rice
Timothy Rich
Jeanette Richoux
Barbara Rider
Peter Rimbo
Joan Robbins
Melissa Roberts
Kit Robinson
Kristina Rodden
Lea Ann Rolla
Janna Rolland
Melissa Ropke
Francis Roque
Jennifer Rosario
Peter Roth
Matt Rourke

Alice Royer
Joyce & Alan Rudolph
Antoinette Ruedisueli
Linelle Russ
Don Russell
Maria Ruth
Mark Rutherford
Ivy Sacks
Alexandrea Safiq
Gwen Sarandrea
Tom Saul
Shae Savoy
James Scarborough
C. Thomas Schaefer
D Schafte
Katherine Schake
Christina Schelle
Carol Schiller
John Schmidt
Arnold Schouten
Pete Schroeder
Betsy Schultz
Kerrie Schurr
Mike Schutt
Harvey Schwartz
Michael Sear
Kim Secunda
Spencer Selander
Jen Semsak
Shannon Serrano
Ken Sethney
Jennifer Shafer
Donald Shank
Lisa Sharp
Diane Shaughnessy
Joan Shelby
Anita Shelton
Sydney Shera
Richard Shield
Linda Shoemaker
Forest Shomer
David Sielaff
Bri Silbaugh

Jill Silver
Katheryn Silverthorn
Rich Simms
David Sims
Brian Skahill
Byron Skaurud
Gloria Skouge
Randy Sleight
Lynae Slinden
Daniel Sloan
Tom Slocum
Brian Smart
Diana Smith
Linda Kay Smith
M Smith
Mike Smith
Seth Snapp
Jeanne Snell
Elly Snow
Nancy Snow
Nancy Sosnove
Eve Staatz
Robert and Gail Stagman
Joan Stanigar
Elizabeth Stanton
Judith Starbuck
Joseph Staten
Chris Stay
Daniel Stearns
Liz Steenbeeke
Linda Stein
Terry Stella
Daphne Stephens
Roy Stephenson
Wilhelm Steve
Douglas Stevenson
Anica Stieve
Mary Stimson
Frank Stowell
Victoria Stratton
Eycke Strickland
Cathy Strum
Don Stuart

Brian Sullivan
Aiko Sumidaa
Dwight Sutton
Ed Sutton
Shannon Svensson
Linda Swan
Jeanna Swanson
Richard Sweezey
Paul Swenson
Sonya Swingle
Kathleen Syck
Mack Talcott
Heath Ashli Taranowski
Phillip Taylor
Ricky Taylor
Fred Teixeira
Elizabeth Tennant
Cheryl Thomas
Vicki Thomas
Earnest Thompson
John Thompson
Uwe Tietze
Gus Tombros
Patricia Tomlin
Tim Towey
Mike Town
Linda Townsend
Carol Trasatto
Teri Travis
Robert Triggs
Mirabai Troll
Elizabeth Twohig-Gibson
Wayne Ude
Kari Ulatoski
Phillip Unterschuetz
Selim Uzuner
Robert Vadas, Jr.
Karla Van Leaven
Ken VanBuskirk
Maha Varad
Lucy Vaughters
Genevieve Vayda
Scott Veirs

Phoenix Vie
John Vieira
Robert Viens
John Vinson
Jeffrey Virgin
Judy Visser
Carol von Borstel
Jodi Wade
Mare Wahosi
Kingston Wall
Jeff Wallace
David Walseth
Casey Wamble
Susan Ward
Patti Warden
Judith Ware
Daniel Warner
Patricia Waterston
Hermian Watkins
Carol Watts
Brian Weatherby
Michael Webb
Anne Weber
Rose Wedlund
Cheryse Wellman
Amber Wells
Lynn Wells
Deborah Welsh
Neva Welton
Shann Weston
Julie Whitacre
AE White
Judith White-Crow
Jennifer Whitney
Karen Wible
Den Mark Wichar
Jane Wiebe
Elaine Willey
Judy Willott
Sarah Wilson
Sheila Wilson
Marian Wineman
Joel and Lucinda Wingard

Sarah Winnett
Michael Winter
Nancy Winters
Kathy Wipperfurth
Esther B Wolf
Rebecca Wolfe
Gordon Wood
Nathanael Wood
Deborah Woodland
Bill Wright

Charles Wurster
Donna Yancy
A.T. Young
Angeline Zalben
Heidi Zamzow
Scott Zema
Barbara Zimmer
Jon Zurit
Megan Zusne

Commenters during March/April 2009 comment period

Organizations and Agencies

City of Everett
Environment Canada
King County - Natural Resources and Parks
Kitsap Alliance of Property Owners (KAPO)
Lower Elwha Klallam Tribe
Lummi Nation
National Oceanic and Atmospheric Administration (NOAA)
Northwest Indian Fisheries Commission (NWIFC)
Northwest Straits Commission
Pacific Coast Shellfish Growers Association (PCSGA)
People for Puget Sound (PPS)
Pierce County
Seattle Public Utilities (SPU)
United States Fish & Wildlife Service (USFWS)
United States Geological Survey (USGS)
Washington State Association of Counties (WSAC)
Washington State Department of Fish & Wildlife (DFW)
Washington State Department of Health (DOH)
Washington State Department of Natural Resources (DNR)

Citizens

Dave Hutsell
Katrina Knutson
Sheldon Levin
Jo Nelson
George Robertson
Heidi Siegelbaum
Priscilla Terry
Eugene Wasserman
Ryan Weber
Arthur West
Kathleen Wolf

Comment	Commenters	Response
General Action Agenda		
<p>Congratulation to the Partnership on doing an excellent job in a short timeframe. The Action Agenda is a comprehensive document with significant and achievable actions in each of the four priority areas. It represents an important milestone in the history of Puget Sound, and because it is described as a flexible and responsive document, it has the potential to make great headway in the cleanup of Puget Sound.</p>	<p>Environment Canada, NOAA, EPA, USFWS, USGS, WSALPHO, CC, CTED, Ecology, WDFW, DNR, WSDOT, WSEHD, WSNWCB, WSG, King Co., King Co. Council, Pierce Co., San Juan Co. Council, Skagit Co., Snohomish Co., Thurston Co., City of Bainbridge, City of Bellevue, City of Everett, City of Gig Harbor, City of Kirkland, City of Redmond, City of Seattle, City of Tacoma, American Rivers, American Whitewater, Boeing, BP Cherry Point Refinery, CLC, CELP, Ducks Unlimited, Futurewise, Herrera, HCCC, HCEC, Kitsap Home Builders, MBA, TNC, North Cascades Conservation Council, NOPLC, Oil Spill Advisory Council, Olympic Environmental Council, Orca Network, PCSGA, PPS, Preserve our Islands, Puget Sound Environmental Caucus, San Juan Initiative, SeaDoc Society, Seattle Aquarium, Sierra Club, Skagit Young Farmers, Snoqualmie Watershed Forum, Transportation Institute, TPL, Vulcan, Washington Council of Trout Unlimited, Washington Environmental Council, WSPA, Whale Museum, Wild Fish Conservancy, Worldwide Water, Jamestown S'Klallam Tribe, Lower Elwha Klallam Tribe, Nisqually Indian Tribe, Northwest Indian Fisheries Commission, Point No Point Treaty Council, Port Gamble S'Klallam Tribe, Squaxin Island Tribe, Swinomish Indian Tribal Community, King Conservation District, Port of Seattle, PSRC, Washington Boating Alliance</p>	<p>The Partnership appreciates the support of the many partners and interested parties who helped make the Action Agenda a successful and supported path for moving forward with Puget Sound protection and restoration.</p>

Comment	Commenters	Response
<p>Staff and citizens stand ready to work with the Partnership and assist in the cleanup of Puget Sound in any way possible. Many agencies, organizations and jurisdictions have staff with expertise in a variety of fields who can be called upon when needed to provide insight, experience, and advice.</p>	<p>Navy, NOAA, USGS, WSALPHO, CC, CTED, Ecology, DNR, RCO, King Co., Haz. Waste King Co., Snohomish Co., Thurston Co., WSAC, AWC, City of Olympia, City of Seattle, City of Shelton, City of Tacoma, City of Tumwater, American Rivers, Boeing, CLC, Ducks Unlimited, Friends of the Earth, North Cascades Conservation Council, SeaDoc Society, Seattle Aquarium, SPOCA, Whale Museum, Nisqually Indian Tribe, PSRC</p>	<p>The Partnership recognizes and appreciates the enormous talent and enthusiasm in the region. This expertise and can-do spirit will be critical for implementation success and the offer of assistance is appreciated and will be tapped.</p>
<p>More detail should be provided on the performance management system, including indicators, targets and benchmarks, and clear links from the BSWP to actions and investments to goals and outcomes (a conceptual model was suggested). Partnership should make clear which proposed actions are intended to affect which indicator and it should be clarified how actions will integrate into major issues (habitat, toxics, nutrients, etc.). The Action Agenda lacked a clear process for adopting and implementing provisional targets and benchmarks and transboundary indicators should play a key role in reporting on the State of the Sound. Commenters suggested the need for a stronger implementation strategy and accountability mechanisms to assure progress, and that adaptive management systems should be in place before making substantive investments in actions in the Action Agenda. Others suggested that the proposed adaptive management system was flawed, and instead the Partnership should observe the system and gather more information before making decisions. They noted that adaptive management and the precautionary principle are mutually exclusive.</p>	<p>Environment Canada, Navy, NMFS, EPA, USCOE, CTED, DNR, RCO, WDFW, DOH, King Co., Pierce Co., Snohomish Co., AWC, City of Bellevue, City of Everett, City of Seattle, Boeing, CELP, Friends of the Earth, HCCC, KAPO, TNC, Northwest Straits Commission, Citizen, Olympic Environmental Council, Orca Network, PMSA, PPS, Puget Sound Environmental Caucus, PSA, SeaDoc Society, Seattle Audubon Society, Sierra Club, Skagit Young Farmers, Snoqualmie Watershed Forum, Starrfish Environmental Consulting, Surfrider Foundation, Washington Realtors, WRIA 16 Planning Unit, Lummi Natural Resources, Nisqually Indian Tribe, Point No Point Treaty Council, Stillaguamish Tribe, Swinomish Indian Tribal Community, PSRC, Citizen</p>	<p>Accountability for action and for results in the ecosystem are what sets the Partnership effort apart from prior Puget Sound recovery efforts. Modifications from the November draft Action Agenda better acknowledged this need and reflect the comments (introductions, Question 1, Question 3 E.1). The May 2009 update to the Action Agenda goes further and identifies more specific elements of the accountability and a commitment to complete substantial portions of this essential work by November 2009.</p>

Comment	Commenters	Response
<p>The Action Agenda frequently calls for additional studies instead of moving forward immediately with restoration and protection actions in known areas. The Partnership should not engage in 'unending study' prior to taking action. Some commenters suggested that the Action Agenda must provide space for creation and innovation to address the challenges facing Puget Sound.</p>	<p>PPS, Puget Sound Environmental Caucus, PSA, Citizen</p>	<p>The Action Agenda is about taking action and many of the near-term actions are ready to go now. Some actions, particularly around policy changes need discussion among interested parties in order to build support for implementation. Study and learning are critical components in making sure that our actions are as effective as possible. The Action Agenda recognizes both needs and the Partnership agrees that innovation and creativity are needed.</p>
<p>Numerous comments that do not reflect current scientific or policy thinking about how to best solve problems in Puget Sound. Examples include, but are not limited to: birth control for sea lions, building reefs in Puget Sound marine waters, directing people to live in other parts of the country and state, and stopping tribal fishing.</p>	<p>Citizen</p>	<p>The Partnership read these comments. They are not included in the Action Agenda as they do not reflect current scientific or policy thinking about how to best solve problems in Puget Sound.</p>
<p>The Partnership to consider social equity and environmental justice when implementing the Action Agenda. The burden of Puget Sound recovery must be borne by all, with regard to both cost and actions.</p>	<p>King Co., Snohomish Co.</p>	<p>Social equity and the engagement of communities not traditionally part of environmental protection and restoration is important. This is an important concept to carry forward when developing actions and future versions of the Action Agenda. The May 2009 revisions to Question 3, Section 4 reflect this need to some extent. The concern about who bears the cost of restoration is reflected in the ecosystem principles in introduction to Question 3.</p>
<p>Partnership should summarize the overall areas of focus and emphasis in the Action Agenda. The final document should convey the urgency of the problems facing Puget Sound.</p>	<p>EPA, King Co., City of Seattle, HCCC, TNC, Northwest Straits Commission, Orca Network, PMSA, Sierra Club, Swinomish Indian Tribal Community</p>	<p>This comment was addressed in the December 1, 2008 Action Agenda by adding a summary section to the introduction. More detail about salmon recovery highlights were added to the May 2009 update.</p>

Comment	Commenters	Response
<p>There is a lack of specificity in the Action Agenda. Many actions are suggested, but little guidance is offered on how first to proceed. Less focus should be placed on process and assembling groups, and more on taking action based on current information.</p>	<p>Citizen</p>	<p>The Action Agenda is intended to be a guidance document and identify near-term actions. In addition, in the time frame available to create a broadly supported Action Agenda, it was difficult to get to the level of detail requested by the comment. Question 4 of the Action Agenda points out the need for specific work plans and implementation details. In addition, the Partnership recognizes that further narrowing and sequencing of actions will help focus the region on addressing the most urgent and important issues. The Partnership chose to include on-the-ground actions (see much of Sections B and C) and processes to address thorny issues that need resolution.</p>
<p>Action Agenda should be scientifically sound, economically feasible, and result in net benefits that will make real improvements in the environmental quality of Puget Sound.</p>	<p>Navy, NOAA, NMFS, EPA, King Co., City of Bellevue, City of Everett, AWB, KAPO, SAVE, Citizen, SPOCA, WPC, WSPA, Lummi Natural Resources, Citizen</p>	<p>The Partnership agrees with this comment. The Action Agenda includes an ongoing program to adapt and improve it over time.</p>
<p>More detail needed on prioritization of actions and specific work plans. Some noted that the near-term actions were 'underwhelming'.</p>	<p>USCOE, EPA, King Co., WSAC, HCCC, PMSA, Puget Sound Environmental Caucus, PSA, Starrfish Environmental Consulting, WSPA, Lummi Natural Resources, Citizen</p>	<p>The near-term actions identified in the November 2008 draft were prioritized for the December 1, 2008 Action Agenda. Some actions were also added during that time. The Agenda is designed to be adjusted over time to make sure that the region is focused on the most important actions.</p>

Comment	Commenters	Response
<p>More detail needed on costs and funding strategy. Some commenters questioned how funds will be distributed to implement the Action Agenda. Commenters suggested both a performance-based approach to grants and a competitive grants process.</p>	<p>WSALPHO, WSEHD, King Co., City of Bellevue, City of Seattle, Chimacum Grange, PPS, WPC, WRIA 16 Planning Unit, Citizen</p>	<p>Additional detail related to costs and the funding strategy were added for the December 1, 2008 Action Agenda. Distribution of some grant funds could be performance-based. The statutorily defined partner process anticipates this concept. At this time it is not anticipated that funding would be allocated by action area.</p>
<p>Roles and responsibilities of the Partnership advisory groups should be clarified, as well as clearer recognition of the Tribes' roles in Puget Sound efforts. Commenters noted that transboundary coordination should take place wherever possible, as it is critical in addressing our shared challenges. Other suggested transboundary coordination should be expanded to include Oregon, California, and Alaska to identify approaches that will be effective for the entire west coast. The document should also include the role of local jurisdictions, citizens and citizen organizations in implementing the Action Agenda.</p>	<p>Environment Canada, EPA, USFS, WSU, Pierce Co., City of Kent, CELP, Jefferson Co. MRC, Northwest Straits Commission, PPS, SeaDoc Society, Snoqualmie Watershed Forum, Whale Museum, Swinomish Indian Tribal Community, Citizen</p>	<p>The December 1, 2008 Action Agenda calls for clarifying roles and responsibilities and that concern is addressed in the May 2009 update. A new appendix contains clarifications of roles and responsibilities of the Partnership Advisory group and staff, communication and work flows within the Partnership, and outlines transboundary coordination with Canada and along the west coast. The role of citizens has also been augmented in Question 3, E.4 of the May 2009 update.</p>
<p>More emphasis is needed on climate change, including proposing strategies for preparing for and adapting to future changes. Identify opportunities for the Partnership to advance Action Agenda priorities while making progress to address climate change, and leveraging existing programs to maximize the potential benefit. Concerns raised include opposition to adding climate change goals to GMA and opposition to requiring consideration of climate change in local comprehensive plans.</p>	<p>EPA, CIG, CTED, Ecology, RCO, King Co., AWC, City of Seattle, American Rivers, AWB, HCCC, MBA, NWF, Orca Network, Puget Sound Environmental Caucus, SeaDoc Society, Jamestown S'Klallam Tribe, The Tulalip Tribes, Citizen</p>	<p>As much as possible, more specificity about including adaptation to climate change was added to actions in Question 3 A-D of the December 1, 2008 Action Agenda. Changes to GMA and SMA related to climate change were not included in the Action Agenda at this time, but could be considered when incorporating state climate change recommendations in the future.</p>
<p>Ecosystem scales are not clear and do not differential actions that will be initiated across the basin, across action areas, or within local watersheds. Commenters noted that implementing actions at the appropriate scale is critical to success.</p>	<p>EPA, AWC, LWVWA</p>	<p>The Partnership agrees that implementing actions at the appropriate scale is essential for success. The Action Agenda introduction and Question 3 introduction were modified to reflect this concern and highlight the importance of the Action Agenda profiles.</p>

Comment	Commenters	Response
<p>Commenters were concerned about whether implementing the Action Agenda would result in the loss of local control for land use decisions, stream flow management, and water quality management. They noted that local control of these function should be maintained, and that new programs should not subject local governments to greater liability.</p>	<p>City of Bellevue, City of Kent, City of Redmond, Kitsap Home Builders</p>	<p>The importance of cities and counties for implementing the Action Agenda, and the need for state and federal agencies to recognize and work with local constraints is acknowledged in the May 2009 update Appendix.</p>
<p>Apply evolving conservation principles essential to the success of Puget Sound recovery (ecosystem resiliency and adaptability).</p>	<p>RCO</p>	<p>No change. This concept was already included in Question 1 and the Ecosystem Principles in Question 3 of the draft Action Agenda.</p>
<p>A number of additions to the Action Agenda are needed to comply with the CCMP structure. This program could provide additional funding for implementing the Action Agenda.</p>	<p>EPA, King Co., Makah Tribal Council</p>	<p>The May 2009 update was developed, in large part, to meet the requirements of the National Estuary Program Comprehensive Conservation Management Plan. The additions and modifications are outlined in the introduction.</p>
<p>Suggestions for technical corrections and clarifications include: incorrect lead implementer, missing partners for an action, incorrect names of existing programs, clarifications and refinements to strategies and actions, and language changes.</p>	<p>Numerous state and federal agencies, tribes, citizens, NGOs, and many others</p>	<p>Numerous clarifying edits related to implementation leads, partners, program names, and descriptions of near-term actions were made for the December 1, 2008 Action Agenda. The May 2009 update reflects a few such additional corrections.</p>
<p>The Action Agenda should recognize the work of previous Sound-wide entities (e.g., PSAT) in the restoration of Puget Sound. The Partnership should apply lessons learned from other major cleanup efforts around the country, and from efforts locally in developing Puget Sound restoration plans. In addition, the Action Agenda should call for the implementation of existing program that are already in place (i.e., WRIAs). Before recommending any changes to existing programs, the Partnership should conduct a comprehensive assessment of their effectiveness and identify priority programs for Puget Sound recovery.</p>	<p>USCOE, Ecology, RCO, King Co., Pierce Co., AWC, City of Bellevue, City of Redmond, City of Seattle, City of Tacoma, Jefferson Co. MRC, North Olympic Salmon Coalition, Olympic Environmental Council, PMSA, Snoqualmie Watershed Forum, Starrfish Environmental Consulting, TPL, WSPA, Jamestown S'Klallam Tribe, Citizen</p>	<p>The December 1, 2008 Action Agenda better recognizes the importance of the foundational protection and restoration work that has occurred over the past several decades. The Partnership is working to learn from other large scale efforts and the May 2009 introduction and Question 3 E.1 were modified to better explain these lessons learned. The introduction of Question 3 was modified for December 2008 to reflect the importance of continuing existing programs at this time.</p>

Comment	Commenters	Response
<p>A number of suggestions were made in how to implement actions in the Action Agenda. Commenters described a number of ongoing programs in their own organizations or other ongoing efforts that directly addressed actions in the Action Agenda, including capital and regulatory programs, as well as outreach and education programs. In several cases, agencies noted where their efforts are hampered by lack of funding and insufficient staffing.</p>	<p>Navy, Environment Canada, USCOE, EPA, USFS, USGS, WSALPHO, CC, King Co., Pierce Co., AWC, City of Bremerton, City of Everett, City of Gig Harbor, City of Kirkland, City of Lake Stevens, City of Seattle, City of Shelton, American Rivers, Boeing, Ducks Unlimited, Jefferson Co. MRC, TNC, San Juan Initiative, Taylor Shellfish Farms, Washington Agricultural Institute, Whale Museum, Jamestown S'Klallam Tribe, Makah Tribal Council, King Conservation District, PSRC, Whidbey Watershed Stewards, Citizen</p>	<p>The number of actors and actions in progress in Puget Sound is significant and was not included in detail in the Action Agenda. The Partnership recognizes that many of these actions are important, need to continue, and that all implementers face significant funding constraints. The need to continue existing actions is recognized in the introduction to Question 3. Over time, additional actions can be added to the list in the Action Agenda.</p>
<p>A number of suggestions were made for programs, technologies, or policies that could aid in the protection and restoration of Puget Sound, including developing native shellfish hatcheries, employing a 'no waste' approach in Puget Sound, implementing oil leak detection programs, and developing water conservation device techniques.</p>		<p>These types of actions can be considered in future versions of the Action Agenda and work plans. Some of these comments pertained to broad concepts that would need stakeholder discussion in order to make them actionable. Others are very specific and do not have soundwide benefit at this time.</p>
<p>Numerous comments that do not reflect current scientific or policy thinking about how to best solve problems in Puget Sound. Examples include, but are not limited to: birth control for sea lions, building reefs in Puget Sound marine waters, directing people to live in other parts of the country and state, and stopping tribal fishing.</p>		<p>The Partnership read these comments. They are not included in the Action Agenda as they do not reflect current scientific or policy thinking about how to best solve problems in Puget Sound.</p>

Comment	Commenters	Response
Changes should be made to the implied prioritization of near-term actions.	USFWS, DNR, WSAC, City of Bainbridge	For the December 2008 Action Agenda clarifications were added. The introduction to Question 3 now indicates that actions are numbered for ease of reference. However, the Question 4 tables list near-term actions in priority order for Strategic Priorities A-C. Section D is not prioritized as it contains a wide mix of actions. Section E was not prioritized as many of these actions are Partnership statutory requirements that must be completed.
Add glossary, references, table of contents and improve pagination.	EPA, USGS, King Co., Pierce Co., Whatcom Co., City of Bainbridge, City of Kent, Olympic Environmental Council, SeaDoc Society, Starrfish Environmental Consulting, WPC. Lummi Natural Resources, Point No Point Treaty Council, Swinomish Indian Tribal Community, Ronald Wastewater District, Citizen	These sections were added for the December 2008 Action Agenda.
Place greater emphasis on the presence of oil in the Puget Sound environment, including its pathways for reaching Puget Sound marine waters, and approaches to addressing the problem. Other commenters advised against broad generalizations about oil spill risk.	Oil Spill Advisory Council, WSPA, Makah Tribal Council	This issue, like many others, is broadly addressed in the Action Agenda. More detail can be added for specific implementation details.

Comment	Commenters	Response
<p>It was unrealistic to provide comments on the Action Agenda in the timeline provided. In addition, different versions of the document were available for review during the comment period with no notice of substantive changes, and important sections were not included for review (such as cost estimates). Commenters were doubtful that the Partnership would be able to consider and analyze comments received during the comment period before the December 1, 2008 deadline.</p>	<p>NOAA, USCOE, USFWS, USGS, King Co., Skagit Co., City of Bainbridge, City of Bellevue, City of Kent, City of Mill Creek, City of Port Angeles, City of Poulsbo, AWB, Kitsap Home Builders, Puget Sound ESA Business Coalition, WSPA, Makah Tribal Council, Citizen</p>	<p>The December 1, 2008 deadline for completion of the Action Agenda was set by the state legislature. It reflects a three-month extension beyond the original statutory deadline. The Partnership recognizes the constraints that this deadline placed on developing a credible Action Agenda and providing ample time for review. The Partnership did its best to accommodate the comments in the time it was given. The additional 30-day review conducted in March and April was intended, in part, to give commenters more time to consider the Action Agenda and for the Partnership to reconsider the November 2008 comments.</p>
<p>Action area groups were not able to fully engage in developing priority actions for their areas. Other critical stakeholders were not meaningfully consulted during the development of the draft Action Agenda, including waterfront property owners and "real" citizens.</p>	<p>WSU, City of Port Angeles, BP Cherry Point Refinery, Chimacum Grange, Puget Sound ESA Business Coalition, Lummi Natural Resources, Citizen</p>	<p>The Partnership did its best in the time available to encourage local participation and provide input in the Action Agenda and identification of local priorities (documented in the Engagement Summary Appendix). Action Agenda Question 3, E.4 recognizes the importance of citizen engagement moving forward.</p>
<p>The Partnership's role should be to initiate discussions among partners and establish expectations for actions, as opposed to directly carrying out actions in the Agenda.</p>	<p>Ecology, City of Poulsbo</p>	<p>The Partnership agrees that working cooperatively with implementers to set expectations for accountability and implementation is important. This is reflected in the May 2009 update in Question 3, E.1. As the Partnership considers where it best adds value, these comments will be considered. This concept is also reflected in the Appendix about roles.</p>

Comment	Commenters	Response
<p>Action Agenda is too focused on aquatic impacts and doesn't focus on preservation and restoration of Puget Sound uplands. Actions should be included that commence assessment efforts for Puget Sound uplands.</p>	<p>WDFW, North Cascades Conservation Council, North Olympic Salmon Coalition, PPS, Seattle Audubon Society, Starrfish Environmental Consulting</p>	<p>The December 1, 2008 Action Agenda reflects the importance of the uplands by calling out the types of habitat to be protected and restored (Question 3, Priority A and Priority B introductions). Many of the current restoration projects are in upland areas. The Partnership agrees that the balance of marine and upland areas needs more consideration as the Action Agenda is refined.</p>
Introduction		
<p>What can people do: Section could use some clarity and boldness. As written, it is too simplistic and out of place in the overall document.</p>	<p>EPA, USGS, WDFW, DOH, RCO, King Co., City of Everett, KAPO, PSA, Sierra Club, Skagit Conservation Education Alliance, Stewardship Partners</p>	<p>The section of concern was removed for the December 2008 Action Agenda. The Partnership will use other means to identify these types of actions. See the May 2009 update, Question 3, E.4 for a discussion of citizen engagement.</p>
Question 1		
<p>Selected indicators should overlap with current Puget Sound-Georgia Basin transboundary ecosystem indicators, which will facilitate planning and implementation for both initiatives.</p>	<p>Environment Canada</p>	
<p>The Partnership should add at least two additional food web indicators targeting higher and lower trophic levels.</p>	<p>CIG, Citizen</p>	
<p>Indicators should combine several parameters into an index of overall health. The six identified indicators are insufficient to assess success at meeting the broad goals of the Action Agenda and defining a healthy Puget Sound.</p>	<p>Ecology, King Co., AWC, City of Seattle, Citizen</p>	
<p>Half of the indicators focus on freshwater resources, yet freshwater protection and enhancement is historically one of the more difficult areas to move forward. It may be more difficult to show progress in these areas.</p>	<p>WDFW</p>	

Comment	Commenters	Response
<p>Targets for increased shellfish growing areas need additional scientific documentation, as the scientific basis to select a benchmark of 10,000 acres is not clear. These areas should also be spatially distributed throughout the Sound, and should include tribal and recreational growing areas as well. The Action Agenda should outline a strategy for achieving this goal. Some commenters questioned whether using the commercial value of expanded shellfish growing areas is incompatible with habitat restoration objectives.</p>	<p>USCOE, DOH, Kitsap Co. Health, Whatcom Co., City of Bainbridge, Coalition to Protect Puget Sound Habitat, HCCC, Olympic Environmental Council, PPS, Puget Sound Restoration Fund, WRIA 17 Planning Unit, Swinomish Indian Tribal Community, Citizen</p>	
<p>Targets for lowland forest area and impervious surface area need additional scientific documentation. The proposed target and benchmark represent additional degradation to local watersheds. Regional targets may be more effective than a single target for the entire Puget Sound basin, and the numbers should be presented as a fraction of the local watershed area. The target might also be divided into coniferous vs. deciduous forest, urban areas vs. outside urban areas, and could prioritize the retention of commercial forests. Some commenters questioned whether forest cover is an appropriate indicator for quality of life.</p>	<p>NOAA, EPA, USFWS, USFS, USGS, CTED, RCO, WSU, King Co., City of Bainbridge, American Rivers, American Whitewater, AWB, Herrera, HCCC, LWVWA, Northwest Natural Resource Group, Northwest Straits Commission, Orca Network, PCSGA, PPS, Puget Sound Environmental Caucus, PSA, RE Sources for Sustainable Communities, SAVE, Sierra Club, Snoqualmie Watershed Forum, Starrfish Environmental Consulting, Surfrider Foundation, TPL, Washington Council of Trout Unlimited, WFPA, Washington Realtors, Wild Fish Conservancy, Stillaguamish Tribe, Citizen</p>	
<p>Targets for Chinook species should include two to four viable populations of Chinook in EACH of five regions, and should include interim targets for evaluating and accelerating progress. Other species could be included as well, such as Hood Canal summer chum and Puget Sound steelhead, and the target could specify 'harvestable' populations. Some commenters questioned whether Chinook populations are an appropriate indicator for water quality.</p>	<p>NOAA, King Co., City of Bainbridge, HCCC, Olympic Environmental Council, PPS, Puget Sound Environmental Caucus, Sierra Club, Jamestown S'Klallam Tribe, Point No Point Treaty Council, Citizen</p>	

Comment	Commenters	Response
<p>Targets for eelgrass area need additional scientific documentation. Historic levels for eelgrass beds may not be known, eelgrass is not present in all areas of Puget Sound, and causes of extensive eelgrass loss are not clearly understood and may be the result of many different factors. The targets and benchmarks for eelgrass should directly link to improvements in eelgrass status and trends. Other habitat indicators might include kelp and marsh habitats, salt water marsh restoration, limitation of shoreline hardening, and the removal of hardened shorelines.</p>	<p>NOAA, EPA, USFS, USGS, King Co., Pierce Co., City of Bainbridge, City of Everett, Herrera, Jefferson Co. MRC, KAPO, Northwest Straits Commission, Olympic Environmental Council, PPS, RE Sources for Sustainable Communities, Snoqualmie Watershed Forum, Lummi Natural Resources, Stillaguamish Tribe, Citizen</p>	<p>Numerous, thoughtful comments on ecosystem indicators were received during the review of the draft Action Agenda. These are listed in the comment summary. Given the importance of the indicators for reporting, the need for some additional discussion about them, and the constrained time for resolving them in November 2008, resolution of these comments did not occur for December 1, 2008. However, the Partnership is using these comments in two ways. First, an ecosystem status and trends report will be produced by November 2009 and these comments will be considered in selecting reporting indicators. Second, the Partnership recognizes that the indicators need to be refined (see Question 1, Question 3, E1 and E3). These comments will also be used during the scoping and analysis of the next phase of indicators.</p>
<p>Targets for instream flows need additional scientific documentation, and do not seem strongly associated with ecosystem health. Instream flow benchmarks should include both wet and dry years, and should include streams that do not have established minimum flow limits.</p>	<p>Environment Canada, NOAA, EPA, USFWS, USGS, CIG, WDFW, King Co., Pierce Co., City of Bainbridge, American Rivers, AWB, CELP, HCCC, PPS, RE Sources for Sustainable Communities, SeaDoc Society, Snoqualmie Watershed Forum, Washington Realtors, Stillaguamish Tribe, Citizen</p>	
<p>Targets for toxic levels in herring need additional scientific documentation. Toxic levels in Georgia Basin herring are rising dramatically and may not be a good target to gauge ecosystem health in general, and water quality in particular. This species and chemical have not been evaluated for human health risk by DOH. Target should include PAHs in addition to or instead of PBDEs, and include other species such as forage fish, crab, clams, english sole. Some commenters suggested using toxics in higher order predators, such as marine mammals, as a target and benchmark.</p>	<p>Environment Canada, NOAA, USCOE, EPA, USFS, USGS, CC, WDFW, DOH, King Co., City of Bainbridge, Friends of the Earth, Olympic Environmental Council, PPS, Puget Sound Environmental Caucus, PSA, RE Sources for Sustainable Communities, Port Gamble S'Klallam Tribe, Citizen</p>	
<p>Targets for water quality should include recreational beaches and shellfish growing areas as a provisional indicators, and it should explicitly include groundwater. Other indicators for water quality could include a decrease and elimination of low oxygen 'dead zones'.</p>	<p>EPA, WDFW, WSU, Whatcom Co., PCSGA, PPS, RE Sources for Sustainable Communities, Lummi Natural Resources</p>	

Comment	Commenters	Response
Consider using loss of farmland as a provisional indicator. Some commenters thought this should be stated so as to highlight improvements in agricultural viability.	CC, Salmon Recovery Council	
Consider using herring abundance or overall forage fish spawning success as a measure of Puget Sound health.	Friends of the Earth, Northwest Straits Commission, Puget Sound Environmental Caucus	
Consider using harbor seal tissue as a more effective indicator for human health.	Friends of the Earth, SeaDoc Society	
Consider using the health of the orca population as an indicator.	Citizen	
Consider using rockfish populations as indicators, which are at historic lows.	Northwest Straits Commission	
Consider using invasive species as an indicator, with a goal to keep populations of invasive species below the threshold of significant impact and eliminate new infestations through early detection and rapid response.	WDFW, King Co., Citizen	
Consider using definition and implementation of TMDLs by 2015 as an alternative water quality indicator.	Lummi Natural Resources	
Consider using changes in the volume of oil imported, refined and exported at the five State refineries as an indicator.	Friends of the Earth	
Consider using miles of public shoreline as an alternative indicator for human well-being, with a goal of a 20% increase in miles and more public access points.	TPL	
Consider using changes in public awareness as an indicator, measured by conducting regular surveys.	Northwest Straits Commission	
Consider using marbled murrelet populations as an indicator, as they make the connection between upland and marine environments.	Seattle Audubon Society	

Comment	Commenters	Response
Consider using the number of lakes that experience recurring toxic cyanobacteria blooms as an indicator.	Citizen	
Consider using the protection of intact headwater forests as an indicator. Measures could include the increase of permanently protected acres and waters in Wilderness or Wild and Scenic River status.	Sierra Club, Citizen	
Question 2		
Separate the discussion of the status of the Sound from threats to the Sound.	King Co., PPS	This discussion of status and threats was separated for the December 1, 2008 Action Agenda.
Include a discussion of the most important threats facing Puget Sound, and the timeline for availability of the risk assessment. Clarify which threats are due to climate change and which result from human activity.	King Co., Northwest Straits Commission, PPS, PCSGA	A discussion of the most important threats facing Puget Sound, as well as how climate change is or will exacerbate the threats was added to the December 1, 2008 Action Agenda in Question 2. A detailed risk analysis was not prioritized in the Biennial Science Work Plan as a two-year action.
Add Puget Sound prairies and native grasslands to the list of habitat types that have suffered significant losses.	USFWS	This concern was added to the text in Question 2.
Clarify the fate of PPCPs in wastewater, as some studies have shown that treatment plants reduce the concentrations of PPCPs, especially through advanced treatment.	EPA, PPS	There is emerging evidence that secondary treatment might partially remove some of the chemicals and that advanced treatment systems perform as well or better than conventional systems (Water quality discussion paper, Table 10 on p. 43). Improved wastewater treatment as discussed in Strategy C.3. should help reduce loads of toxic chemicals, including PPCPs.

Comment	Commenters	Response
<p>Provide additional scientific basis for the discussion of septic systems as significant sources of nitrogen. Studies indicate that malfunctioning septic systems are not a significant source of nitrogen, and it is unclear whether improperly functioning septic systems are a source of bacteria and viruses. DOH informational materials do not support this view.</p>	<p>Kitsap Co. Health, KAPO, PPS</p>	<p>Strategy C.4's discussion of nitrogen from septic systems is consistent with the presentation in the Partnership's water quality discussion paper at pages 46-47 and 59. Although the scientific basis for the statements in the discussion paper is not clear, the statements are consistent with the Department of Health's 2005 report on nutrient removal technologies for onsite sewage systems (available online from DOH at http://www.doh.wa.gov/ehp/ts/WWW/ww-links.htm).</p>
<p>Overall, harvest is inadequately addressed as a threat. Consider including derelict gear and ghost fishing implications, as well as some terrestrial examples. Clarify that shellfish harvest also helps mitigate pollution. Some commenters noted that shellfish harvest has not been scientifically shown to be a threat to the long term health of Puget Sound.</p>	<p>EPA, King Co., PPS, Puget Sound Restoration Fund, Taylor Shellfish Farms, Citizen</p>	<p>Question 2 was reorganized following the November draft. Harvest is both a benefit to people who are part of the ecosystem and can impact the ecosystem. This is reflected in the Action Agenda, including the action area profiles. Shellfish harvest is recognized as an ecosystem service in A4. Derelict gear was added as a threat in May 2009 update.</p>
<p>Consider including the building of logging roads and resulting acute or chronic erosion as a threat.</p>	<p>HCCC</p>	<p>Question 2 of the May 2009 update reflects this concern.</p>
<p>Include a discussion of surface and groundwater quality as a significant threat to Puget Sound. Clarify that the withdrawal of water from rivers and aquifers is highly beneficial to people.</p>	<p>WDFW, King Co., City of Kent</p>	<p>Pollution of groundwater was added to the threats discussion in Question 2 for the May 2009 update. The importance of water for people is reflected in Question 3, A.3.</p>
<p>Clarify the statement about the decline in the April 1 snowpack as well as the claim that snowpack sustains all rivers in Puget Sound.</p>	<p>CIG, Kitsap Co. Health, City of Kent</p>	<p>A modification was made to reflect this comment in the December 1, 2008 Action Agenda.</p>

Comment	Commenters	Response
<p>Consider including resources other than salmon aquaculture as threats to Puget Sound, such as shellfish hatcheries and farming. Clarify that salmon hatcheries can play a significant role in Puget Sound recovery.</p>	<p>King Co., Pierce Co., Sierra Club, Washington Council of Trout Unlimited</p>	<p>The artificial propagation discussion was broadened following the November 2008 draft. The role of hatchery production of salmon is recognized as important, particularly in the Action Area profiles. The Action Agenda recognizes that all of the "threats" are related to actions that have some benefit to people.</p>
<p>The threat of invasive species should include impacts from climate change, particularly as they result in changes to species migration patterns. Aquaculture practices should be included in the invasive species pathways list.</p>	<p>AWC, Coalition to Protect Puget Sound Habitat, SeaDoc Society</p>	<p>The May 2009 update reflects this comment.</p>
Question 3		
<p>Acknowledge federal regulatory programs and the role they play implementing actions, such as NEPA and existing mitigation rules. Use these tools and existing programs before seeking reauthorization of national environmental legislation (e.g, Clean Water Act)</p>	<p>USCOE</p>	<p>The Partnership recognizes that numerous federal, state and local programs, including regulation are important for implementing the Action Agenda. An analysis of program efficiency is called for in Section D.4. Future versions of the Action Agenda can call out these programs in more specific detail.</p>
<p>There have been a number of integrated ecosystem studies already conducted around the country.</p>	<p>USGS</p>	<p>The December 1, 2008 Action Agenda was modified to reflect this comment.</p>
<p>Manage groundwater and surface water as one resource. Create concurrent management strategies and plans for surface and groundwater, including source water protection, education/outreach for groundwater protection, planning for the potential impact of climate change, and water quality and quantity targets. Protecting cold-water refugia in Puget Sound streams should be a high priority action.</p>	<p>Environment Canada, USGS, Tacoma-Pierce Co. Health, HCCC, WRIA 16 Planning Unit, CIG</p>	<p>The intent of Priority C is to look at at surface and groundwater as one connected resource from a water quality perspective, and more work is needed on this issue for the future. The Partnership chose to address the water flow protection issues in Priority A.</p>
Question 3: Priority A		

Comment	Commenters	Response
<p>A.1 Mapping ecosystem function at multiple scales is critical, and this effort should begin quickly and build on existing watershed analyses. Maps should be developed at both the WRIA scale and basin-scale, and should be updated on a regular basis. These characterizations should focus both on impacted areas and areas where opportunities exist for protection and restoration. Some commenters felt the watershed characterizations were poorly defined.</p>	<p>Environment Canada, EPA, USFS, USGS, City of Kirkland, CLC, HCCC, PPS, Puget Sound Environmental Caucus, Wild Fish Conservancy, Swinomish Indian Tribal Community, Citizen</p>	<p>The Partnership agrees that ecosystem mapping at various scales is important. The watershed characterizations are called out as a high priority near-term action. A detailed work plan will be developed for this and all other actions.</p>
<p>A.1 Provide additional clarity on the process for establishing local watershed protection frameworks. These frameworks should direct funding to assure local decisionmakers can accommodate expected growth while protecting Puget Sound. However, the process may result in conflicts among jurisdictions, and at times may require exceptions be made to laws like GMA. Commenters suggested the Action Agenda should call for a uniform set of habitat protection standards across all jurisdictions, that activities should be better linked with watershed-based stormwater permits, and that permanent protection of headwater and roadless areas should be strengthened. Other commenters suggested that the Partnership should consider shifting regulation of critical areas and shorelines to the state level.</p>	<p>EPA, Kitsap Co. Health, City of Kirkland, City of Olympia, City of Seattle, City of Tacoma, AWB, Herrera, HCCC, Kitsap Home Builders, PPS, Puget Sound Environmental Caucus, SAVE, Sierra Club, Wild Fish Conservancy, Swinomish Indian Tribal Community, PSRC, Citizen</p>	<p>The intent of the watershed characterizations is to provide a basis for a local protection framework. Details will be developed once the characterizations are complete. The local protection frameworks will need to be developed with local jurisdictions to address possible conflicts ahead of time. The concept of a uniform protection standard is identified in A.1.4. Shifting regulation from local governments to the state would need careful discussion and could be considered in the future if warranted.</p>
<p>A.1 It is critical to identify both growth and climate change as key factors in a long-term ecosystem protection approach. Commenters suggested creating a 'think tank' to develop new ideas on how to retain a viable economy while limiting growth and development that imperils the Puget Sound ecosystem. This planning group should also ensure specific examination of development pressures on rural and resources lands. Some commenters suggested that limiting growth will only increase the burden on the building industry and the home buying public.</p>	<p>EPA, USFS, CTED, WSEHD, King Co., AWC, City of Bellevue, City of Everett, City of Seattle, BIAW, CLC, NWF</p>	<p>Growth and climate are recognized as critical pressures on the ecosystem. A think tank to address the long-term needs related to growth is one solution that could be considered.</p>

Comment	Commenters	Response
<p>A.2 FEMA and local governments should work to move existing development out of floodplains, and should restrict the location or expansion of UGAs into these areas. Some commenters suggested that restricting development on buildable lands inside designated UGAs runs counter to the goal of increasing density in urban areas, while others did not agree that this effort would result in any net loss of buildable residential, commercial, or industrial land. Commenters noted that this effort will likely take a large amount of staffing, local support, and significant time. This work should also focus on maintaining working and viable resource lands, not just retaining rural lifestyles, and should include Tribes and property owners.</p>	<p>USFS, CC, CTED, King Co., Pierce Co., City of Seattle, AWB, Futurewise, HCCC, MBA, NWF, Washington Realtors, Jamestown S'Klallam Tribe, Citizen</p>	<p>The Partnership recognizes that addressing floodplain development is complex and needs to consider the issues presented by the commenters. As part of the Partnership's efforts related to near-term action D.4.(4), this concern under discussion. It is in the Action Agenda in A.2.2.5.</p>
<p>A.2 Limiting density and allowing infill in UGA, including annexation issues and revenue sharing, are contentious issues. These may distract from the overall purpose of the Action Agenda and some commenters suggested deleting this action. Others noted that different regulatory expectations are appropriate for urban areas vs. rural areas, and additional measures should be included to determine appropriate areas for UGA designation. Concerns were raised over the wisdom of directing growth to urban areas, fearing that increases in urban density could come at the cost of liability. Overall, there is a need to find remedies to the transportation concurrency problem that contributes to urban sprawl, and a need to provide incentives and requirements for increased urban densities.</p>	<p>WSAC, City of Poulsbo, AWB, Futurewise, HCCC, KAPO, Kitsap Home Builders, MBA, Seattle Audubon Society, WFPA, Citizen</p>	<p>The Action Agenda recognizes that changes in the way the region has traditionally grown are needed for long-term ecosystem protection. The Partnership agrees that these issues will require thoughtful consideration to address the issues raised by the commenters. The list of what is needed in Question 3 A.2.2 was refined for the December 1, 2008 Action Agenda to reflect these concerns.</p>
<p>A.2 Consider including a call for modernizing development vesting rights, as well as using better science in land use policies and zoning. Any program to purchase development rights must be complemented by innovative market-based solutions such as transfer of development rights (TDR) programs. The Partnership should prioritize the effective establishment of TDR programs.</p>	<p>King Co., City of Tumwater, American Whitewater, CLC, Futurewise</p>	<p>Discussion of the vesting rights was a contentious issue during the development of the Action Agenda with strong opinions that it both must be and must not be included. It is listed as something that needs ongoing discussion moving forward. TDR as a tool is identified in the Action Agenda and ranked as a mid-priority near-term need.</p>

Comment	Commenters	Response
<p>A.2 Consider including key upland habitats, including prairies, oak savannas, some older forest habitats, and inventoried roadless areas in priorities for local protection and restoration work. Directly promote wilderness and park designation in Puget Sound watersheds.</p>	<p>USFWS, North Cascades Conservation Council, Sierra Club</p>	<p>The list of habitat types needing protection and restoration was broadened for the December 1, 2008 Action Agenda. Wilderness and park designations are one tool for land protection and called out in Section A.2. Support for specific new wilderness areas is a near-term action.</p>
<p>A.2 Ensure the measures identified related to bulkheads and docks will meet the outcomes desired, given the required staff effort to implement and the significant property issues and conflicts of rights surrounding conditional use permits for bulkheads. Attention should also be given to existing structures and development, and resorts and marinas along shorelines should be restricted. Clarify if the no net loss provision includes exemptions for public and national security benefits. Some commenters stated that construction of residential docks and repair of bulkheads does not contribute to the degradation of Puget Sound, and because waterfront uses like docks and bulkheads will continue the Partnership should help develop permitting and mitigation mechanisms that are cost effective and successful.</p>	<p>Navy, Ecology, WSAC, AWC, City of Bellevue, City of Everett, HCCC, KAPO, MBA, Olympic Environmental Council, SPOCA, Washington Council of Trout Unlimited, Citizen, Washington Realtors, Wild Fish Conservancy, Lower Elwha Klallam Tribe, Washington Ports, Citizen</p>	<p>Partnership recognizes that development of this idea needs careful consideration to address the range of issues identified by the commenters.</p>

Comment	Commenters	Response
<p>A.2 Consider accelerating adoption and changes to SMA and GMA, as SMP updates provide a tremendous opportunity to improve environmental protection and integrate programs, policies and management. Consider requiring updates to characterize erosion hazards and threats to shoreline functions due to sea level rise. Some commenters did not support creating a new version of shoreline guidelines that will need to be incorporated into local shoreline plans. Resolving the legal uncertainty of the intersection of GMA and SMA should be a high priority, and instead of developing more regulations, consider the use of incentives and other market-based measures to increase levels of protection for shorelines. Local governments need to be included in these conversations, and funding and technical assistance should be provided. Commenters noted the need to also amend the HPA process, focusing on making it stronger and more enforceable.</p>	<p>EPA, CC, Ecology, Pierce Co., AWC, City of Bellevue, City of Gig Harbor, City of Kirkland, City of Seattle, AWB, Futurewise, Herrera, HCCC, Kitsap Home Builders, LWVWA, MBA, NWF, PPS, Puget Sound Environmental Caucus, RE Sources for Sustainable Communities, Snoqualmie Watershed Forum, Stewardship Partners, Washington Realtors, Wild Fish Conservancy, WRIA 17 Planning Unit, Point No Point Treaty Council, The Tulalip Tribes, Citizen</p>	<p>Acceleration of the current schedule was discussed but not recommended in the Action Agenda. There was concern that opening up the agreed-upon schedule could provide additional legal challenges to the the program. In addition, both local and Ecology staff are pressed to meet the current schedule. Acceleration or updates could be considered in the future when the updated schedules are set. The need to resolve the overlap and intersection of GMA and SMA is broadly covered and D.1.2 and near-term action D.1 (1). The need for protection-oriented regulation and incentives and market-based solutions and technical assistance is called out throughout the Action Agenda in Sections A.2.2, and near-term actions for section A.2. The Partnership agrees that local governments must be part of these discussions -- see Sections D.3.2 and the May 2009 update Roles Appendix. Resolving issues related to the HPA program was added as a near-term action to the December 1, 2008 Action Agenda.</p>

Comment	Commenters	Response
<p>A.2 Consider identifying land acquisition as a near-term action, with clear direction to local communities that high quality habitat and ecosystem value are primary drivers for acquisition. Long-term focus should be on providing assistance for landowners who are located in areas where there are threats to the Sound ecosystem, and a purchase program should be complemented with an aggressive conservation easement program with incentives. Funds should be made available for once-in-a-lifetime opportunities for acquisition, and acquisition costs should also consider long-term maintenance and management costs. Consider acquisition as a way to create more public spaces and as a means to direct people to the places best suited for public use.</p>	<p>CC, CTED, Pierce Co., City of Seattle, TNC, Sierra Club, Snoqualmie Watershed Forum, TPL, Citizen</p>	<p>Land acquisition is specifically called out in the Action Agenda (see A.2.1.1 and near-term action A.1 (1)) and is ranked as a very high priority. The Action Agenda also recognizes that acquisition, easements, and incentives for private landowners are all needed (see A.2 and A.4). The need for rapid response acquisition funding is called out (near-term action A.2 (3)). The need for long-term maintenance of publicly-acquired lands and restoration projects was added in Section B.1.3 for the December 1, 2008 Action Agenda. The importance of public spaces and connections to the natural system was added in Section A.2 for the May 2009 update.</p>
<p>A.2 Consider identifying protection incentives as a separate near-term action, including using Outstanding Resource Water designations to achieve habitat protection and prevent water pollution.</p>	<p>American Rivers, American Whitewater, Surfrider Foundation, Wild Fish Conservancy, Snoqualmie Watershed Forum</p>	<p>The Partnership chose to identify the importance of protection incentives in Sections A.2, A.3, and A.4. If desired, future versions of the Action Agenda could call out incentives separately. The concept of special river designations was added as A.2.1.4 to the December 1, 2008 Action Agenda.</p>
<p>A.3 Establishing water masters can be an effective response and deterrent to illegal and excessive water use. Water masters need the power to regulate between existing water rights. Some commenters noted that water master programs may not effectively protect instream flows because those flows may be low on the priority list.</p>	<p>Ecology, Pierce Co., CELP</p>	<p>The concerns raised are beyond the level of detail of the Action Agenda. They would need to be developed as the action is scoped in more detail and a work plan is developed.</p>

Comment	Commenters	Response
<p>Updating instream flow rules would require a large investment of staff time, funding and stakeholder involvement. Some commenters questioned whether this would be a valuable investment, especially given that some of this work is already underway by Ecology. Not all streams will be protected by instream flow rules and new mechanisms are needed to establish flow targets, including a program that prioritizes developing ecologically sound instream flows and does not subordinate flows to existing water rights. Clarification is needed to understand how setting flow rules will affect federal water rights authority, existing water rights and wastewater discharges for cities, as well as overallocation of water rights. There should be further discussion about the inherent conflict between water for people and water for fish.</p> <p>A.3</p>	<p>Navy, Ecology, USGS, WDFW, WSEHD, AWC, City of Kent, CELP, TNC, RE Sources for Sustainable Communities, Washington Council of Trout Unlimited, Washington Realtors, Wild Fish Conservancy, WRIA 16 Planning Unit, WRIA 17 Planning Unit, Jamestown S'Klallam Tribe, Citizen</p>	<p>The Action Agenda is written to reflect the need for a comprehensive approach to water use and consumption. The issues related to setting new instream flows and updating rules would need to be resolved as this issue is scoped. These concerns are reflected in the numeric ranking of the near-term action in Question 4. In addition, the long-term potential conflicts over water allocation and use will continue to need more regional resolution.</p>
<p>Consider including Ecology's efforts to adopt rules on reclaimed water use. Commenters suggested that reclaimed water use should not be required or mandated in statute, but considered on a case-by-case basis or only when it is protective of human and wildlife health. Municipal systems should include conservation goals, metering, and reporting requirements, and water laws that discourage conservation and efficiency (such as rainwater harvesting) should be revised.</p> <p>A.3</p>	<p>DOH, WSEHD, AWV, City of Poulsbo, City of Seattle, AWB, Kitsap Home Builders, MBA, Olympic Environmental Council, PPS, Puget Sound Environmental Caucus, Washington Council of Trout Unlimited, Lummi Natural Resources</p>	<p>A near-term action related to state water reuse rules was added to the December 1, 2008 Action Agenda. Municipal rule revisions are broadly covered by near-term action A.3(7).</p>
<p>Protecting and maintaining working resource lands is important for protecting Puget Sound ecosystems. This action requires concrete strategies for how to protect working farms, forests and aquatic lands, and should include criteria for identifying and prioritizing lands, and management plans that include water quality compliance. Not all commenters supported a regulatory approach to maintaining resource lands. Some noted that working farms are often exempt from environmental regulations and may prevent floodplain processes from occurring. Commenters noted that forestry needs to be viewed at a watershed scale and forest management level, and other suggested considering including water-dependent uses (ports and existing marine industrial uses and activities) as uses to be sustained.</p> <p>A.4</p>	<p>CC, Ecology, King County Ag., King County Rural Forest Comm., Northwest Natural Resource Group, PPS, Snoqualmie Watershed Forum, WFPA, Jamestown S'Klallam Tribe, Stillaguamish Tribe, Port of Seattle, Citizen</p>	<p>The Partnership agrees that detailed, specific strategies to protect and sustain working lands are needed. Some of these exist now and many need to be augmented as identified in the Action Agenda. The Action Agenda identifies both regulatory and incentives as needed. The December 1, 2008 Action Agenda was modified to better include ports in B.2.2.</p>

Comment	Commenters	Response
<p>A.5 Consider including near-term actions focused on increasing capability for rapid response to new invasive species and implementing a public education program for invasives. Include specific actions to improve current control efforts, reduce populations of existing invasive species, focus on freshwater invasives, and support Integrated Pest Management. The Partnership role should be in enhancing and supporting these activities, not 'guiding' them.</p>	<p>USFWS, WDFW, WSNWCB, RCO, King Co., City of Kirkland, HCCC, TNC, Seattle Audubon Society, Snoqualmie Watershed Forum, Jamestown S'Klallam Tribe, Citizen</p>	<p>These comments were addressed by adding sub-objectives and near-term actions for the December 1, 2009 Action Agenda.</p>
<p>A.5 Consider adopting the International Maritime Organization and US Coast Guard voluntary standards for ballast water exchange to prevent introduction of invasive species, or investigate mid-ocean exchange of ballast water for trans-Pacific commercial vessels. Note that current ballast water discharge standards do exist (see WDFW Web site), and consider the potential economic impact of new ballast water standards.</p>	<p>Navy, EPA, Herrera, Seattle Audubon Society, Washington Ports, Citizen</p>	<p>The December 1, 2008 Action Agenda and May 2009 update reflect revisions to recognize current ballast water standards. Adopting other or additional standards would need to consider concerns such as economic standards.</p>
Question 3: Priority B		
<p>Ensure Priority B (and the Action Agenda overall) uses a ecosystem-based approach, as opposed to a species-oriented approach for long-term effective restoration activities.</p>	<p>Ecology, AWC, City of Kent, PPS, RE Sources for Sustainable Communities, Citizen</p>	<p>The intent of the Action Agenda is for the Puget Sound region to use an ecosystem-based approach, as described in the discussion of ecosystem principles in the introduction to Question 3. This need is reflected in Priorities A, B, C, and specifically discussed in D.</p>
<p>Consider adding "and species" to Priority B and Priority C.</p>	<p>NOAA</p>	<p>Species are currently part of Section D, although for future versions of the Action Agenda, restoration of species could be part of other sections.</p>
<p>Clarify that limits on vegetation removal are exclusive of the work necessary to remove invasive plant species, and do not include commercial forestry where re-forestation is occurring.</p>	<p>WSNWCB, WFPA</p>	<p>Clarification was made to the Introduction to Priority B in the May 2009 update.</p>

Comment	Commenters	Response
<p>B.1 Emphasis should be placed on restoration planning instead of only working where opportunities already exist. Restoration planning is a requirement of SMP guidelines, and the Partnership should work to ensure local restoration plans are consistent with major Puget Sound restoration efforts as well as provide funding for restoration plans. Include a focus on non-regulatory incentives to motivate property owners toward protection. Large restoration projects are inherently complex and costly, and should be subject to monitoring, maintenance, and performance audits to determine their effectiveness.</p>	<p>USCOE, AWC, City of Bellevue, City of Gig Harbor, City of Poulsbo, Washington Council of Trout Unlimited, Citizen</p>	<p>The Action Agenda was written to reflect the need to both implement current projects and the need for a more strategic approach to restoration (see B.1.2). The Partnership must balance the desires of various interests to act now and be more strategic. Consistency of local plans with the Action Agenda is called on in Section D, incentives for landowners are in Section B.3. The effectiveness monitoring of large scale ecosystem projects is discussed in the Biennial Science Work Plan. Maintenance was added as Section B.1.3 for the December 1, 2008 Action Agenda.</p>
<p>B.1 Consider specifically identifying hydrologic alteration, including stream flow restoration actions and replacement and ongoing maintenance of culverts and tidegates throughout Puget Sound.</p>	<p>EPA, WDFW, Swinomish Indian Tribal Community</p>	<p>Hydrologic function as a restoration need was added to B.1 introductory text for the May 2009 update. The large scale projects are intended to help the hydrologic alterations in the basin. Stream flow restoration actions are covered in Section A.3, replacement and maintenance of culverts and tidegates is covered in B.1 and related near-term actions.</p>
<p>B.1 Consider including removal of derelict fishing gear as a near-term action.</p>	<p>USFWS, San Juan Co. Council, Jefferson Co. MRC, Northwest Straits Commission, SeaDoc Society</p>	<p>This action was added to the December 2008 Action Agenda in Section B.1 and near-term action B.1(6).</p>
<p>B.1 Consider including development of native shellfish hatcheries or partnering with tribal shellfish hatcheries to restore native shellfish populations to historic ranges. Include other shellfish species as well.</p>	<p>Whatcom Co., Puget Sound Restoration Fund</p>	<p>This action is not specifically called out in the Action Agenda and is identified as something that could warrant further consideration moving forward.</p>
<p>B.1 Consider including actions that address the threat to Puget Sound shorelines from industrial geoduck aquaculture practices.</p>	<p>Citizen</p>	<p>Actions to promote aquatic lands that are protective of ecosystem health are covered in A.4.4. Resolution of conflicts related to aquaculture is identified as a near-term action A.4(5).</p>

Comment	Commenters	Response
B.1 Consider including a call for changing forest management practices to more closely mirror natural forests.	Northwest Natural Resource Group	Long-term forestry practices are covered by Forests and Fish. This action could be considered in the future as warranted.
B.1 Consider including restoration projects for marine riparian areas.	Starrfish Environmental Consulting	The list of habitat types needing restoration was added to the December 1, 2008 Action Agenda.
B.2 Consider including actions that call for significant investment in comprehensive planning, shoreline planning, SEPA and infrastructure and services to accomplish waterfront revitalization. This effort should include increased public access to the water and retrofitting old docks, piers and waterfront facilities. Commenters suggested including habitat restoration in pockets of urban areas as worthwhile investments, as well as the work on the Seattle Waterfront. Others commented that revitalizing waterfront communities is work for developers, not the Partnership.	CTED, AWC, City of Gig Harbor, AWB, PPS, RE Sources for Sustainable Communities, Stillaguamish Tribe, Citizen	The need for planning and environmental analysis in relation to waterfront revitalization was added for the May 2009 update. Increased public access was added for the December 1, 2008 Action Agenda. Retrofitting of existing facilities is implied by B.2.1. The Action Agenda identifies work for all stakeholders, including the private sector. Revitalization of waterfront areas will require collaboration of public and private interests. The Partnership recognizes that urban habitat restoration projects can be beneficial, although they may not be the scale needed for ecosystem recovery. These types of projects may be covered by B.1.1 and near-term action B.1 (1).
B.2 Clarify how "green port" and clean marina initiatives would affect DOD facilities	Navy	Development of these programs could involve the Department of Defense as warranted. This concern could be discussed in the scoping phases and/or in collaboration with the ports and Department of Defense.
Question 3: Priority C		
C.1 Consider addressing both biology and toxicology in decision-making. Encourage Ecology to list waters as impaired under Clean Water Act 303 (d) based on biological and toxic information.	Environment Canada, EPA	Changing the way waterbodies are listed under the Clean Water Act is not included in the Action Agenda. It is identified as an item for future consideration.

Comment	Commenters	Response
<p>C.1 More specifically describe the call for national standards to address new and emerging contaminants. Instead of advocating for standards, commenters suggested careful observation of new chemicals and working closely with other states in policy reform at the national level. At the state level, there is authority to update standards and the Partnership should identify which new contaminant are highest priority to be regulated by the state. Encourage pharmaceutical takeback programs and provide a dedicated funding source.</p>	<p>EPA, Ecology, King Co., Haz Waste King Co., City of Seattle, KAPO, PPS, PSA, Washington Citizens for Resource Conservation, Citizen</p>	<p>Section C.1.1 was modified for the December 1, 2008 Action Agenda to reflect this concern.</p>
<p>C.1 Consider approaches to addressing other sources of pollution and toxics, including strengthening focus on air quality management plans, recommending action on pesticide reduction, enforcing CAFO permits, addressing noise pollution, addressing point source pollution, developing and implementing source control methodologies for dissolved metals and other pollutants, addressing industrial sources of pollution, working to identify safer chemical alternatives, advancing green chemistry and technologies, encouraging product stewardship, addressing reduction of PBTs, and increasing use of TMDLs. Strengthen recommendations to prohibit new discharges into the Sound, beyond just a public education campaign. Include a reference to the state's Beyond Waste Plan. One commenter suggested separating toxics and pathogens into their own section in the Action Agenda and creating a series of new near-term actions.</p>	<p>EPA, USFWS, Ecology, King Co., Haz. Waste King Co., City of Bellevue, City of Seattle, City of Tacoma, LWVWA, Olympic Environmental Council, PPS, Puget Sound Environmental Caucus, Puget Sound Restoration Fund, PSA, RE Sources for Sustainable Communities, Starrfish Environmental Consulting, Northwest Indian Fisheries Commission, Port Gamble S'Klallam Tribe, Swinomish Indian Tribal Community, The Tulalip Tribes, Citizen</p>	<p>Section C.1 was substantially revised to include these comments for the December 1, 2008 Action Agenda. CAFO permits were added to Section C.2. Noise pollution is not addressed in the Action Agenda but could be considered as warranted as human well-being desired outcomes are further refined.</p>
<p>C.1 Eliminating mixing zones for PBTs and restricting them for other toxic chemicals is critical to success of the Action Agenda. Consider convening a stakeholder group to examine and update mixing zone guidelines and policies.</p>	<p>Haz Waste King Co., PPS, PSA, RE Sources for Sustainable Communities, Citizen</p>	<p>Elimination of mixing zones was added as C.1.1.8. In the future, it could be considered as a near-term action.</p>

Comment	Commenters	Response
<p>C.1 The Oil Spill Advisory Council and the Department of Ecology have already expanded the oil spill prevention programs and oil spill response programs to meet the targeted overall pollution reduction strategy. Ensure the Oil Spill Advisory Council has sufficient resources to make meaningful recommendations. Some commenters opposed the recommendations of the Oil Spill Advisory Council, noting they have little or no regard for the input of the regulated marine industry. Ensure there is no costly duplication of efforts in this area, and that marine vessels are not held to a higher standard than other modes of transportation.</p>	<p>Navy, BP Cherry Point Refinery, Oil Spill Advisory Council, PMSA, PPS, Seattle Audubon Society, Transportation Institute, WSPA, Citizen</p>	<p>Section C.1.2.1 reflects a broad need related to oil spills. The Partnership agrees that duplication of effort for programs should be avoided.</p>
<p>C.1 Clarify language about vessel boarding and inspection authority. Both Ecology and USCG currently have jurisdiction in several areas affecting marine pollution prevention. Some commenters suggested there is no need to enhance the delegated authority as there is no shortfall in existing programs.</p>	<p>Ecology, PMSA, Washington Ports</p>	<p>The text for C.1 (4) was clarified for the December 1, 2008 Action Agenda.</p>
<p>C.1 Clarify the intention of "No Discharge Zones" and whether this applies to discharge from vessels and ballast water. One commenter noted that the Clean Water Act does not require pump-out facilities to exist prior to making a No Discharge Zone designation. Some commenters supported creating a "No Discharge Zone" for all of Puget Sound, while others preferred a focus on areas that are nutrient-limited, have high vessel use, and have significant shellfish production.</p>	<p>Navy, King Co., Pierce Co., Friends of the Earth, PPS, PSA, RE Sources for Sustainable Communities, Jamestown S'Klallam Tribe, Port of Seattle, Washington Ports, Citizen</p>	<p>Establishing a no-discharge zone for Puget Sound would require careful consideration of these and other issues during scoping and development.</p>
<p>C.2 Consider expanding discussion of LID to require LID techniques where feasible, per the Pollution Control Hearing Board's ruling. Conduct additional research into the feasibility of LID techniques, and have open discussion about the costs, applicability or effectiveness of LID, and the call for retrofits to address existing problems. LID should be a regulatory approach, not an incentive, and performance-based flow volume credits should be awarded for LID techniques. Provide financial and technical assistance to implement LID regulations, and include Ecology's Coastal Training Program as a training resource.</p>	<p>Ecology, King Co., City of Kirkland, City of Olympia, City of Poulsbo, City of Seattle, AWB, Kitsap Home Builders, MBA, PPS, Puget Sound Environmental Caucus, PSA, SAVE, Sierra Club, Snoqualmie Watershed Forum, Washington Realtors, WRIA 16 Planning Unit, The Tulalip Tribes, Washington Ports, Citizen</p>	<p>The December 1, 2008 Action Agenda was modified to reflect the Hearings Board ruling, training needs, and other concerns. An LID program can have both regulatory and incentive components. Like other actions, implementation of LID will be refined as these techniques are more broadly implemented and we learn about effective implementation.</p>

Comment	Commenters	Response
<p>C.2 Reconsider the near-term action to convene a CSO group for King County, Seattle, and EPA, as this is not an appropriate role for the Partnership. If formed, the group should consist of regulating agencies and regulated parties. Commenters suggested that a more proactive approach to CSOs is appropriate at this time, as CSOs are a major problem for the loadings of some toxics in urban bays.</p>	<p>EPA, King Co., City of Olympia, PPS</p>	<p>The Combined Sewer Overflow issue is complex and is more of a priority for some geographic regions and implementers than for others. It is ranked lower in the priority list for this reason. The Partnership's role in this process needs to be determined. For the May 2009 update, the lead implementer was changed to TBD.</p>
<p>C.2 Consider strengthening recommendations to address stormwater, including expansion of NPDES program, stronger accountability for LID implementation, prioritizing retrofits, implementation of effluent guidelines, and addressing industrial and construction stormwater issues. Clarify that NPDES permits do not guarantee water quality standards will be met. Commenters noted that the Partnership role should be to fund retrofits of existing problems, not just prioritize projects based on sound science.</p>	<p>EPA, USFWS, USFS, Ecology, AWC, City of Kent, City of Kirkland, Kitsap Home Builders, MBA, Northwest Straits Commission, PCSGA, PPS, PSA, Sierra Club, Worldwide Water, Northwest Indian Fisheries Commission, Citizen</p>	<p>The December 1, 2008 Action Agenda contains clarifications to better address these concerns: C.2.2.3 covers expansion of stormwater programs into areas not currently covered, industrial and transportation NPDES permits, funding of retrofit projects, and need to achieve water quality standards. Accountability for any implementation action is covered in Section E.1.</p>
<p>C.2 Consider including a near-term action to address stormwater concerns in an ecosystem protection approach. Incorporate stormwater management programs into integrated watershed planning at the appropriate scale. Some commenters raised concerns about how this integrated approach would be implemented, and others suggested that the proposed program to reduce stormwater pollution is not comprehensive enough.</p>	<p>EPA, USFWS, Ecology, King Co., San Juan Co. Council, City of Bellevue, City of Kent, PPS, Puget Sound Environmental Caucus, Northwest Indian Fisheries Commission, Squaxin Island Tribe, The Tulalip Tribes, Citizen</p>	<p>The Action Agenda points to the need to address stormwater from an ecosystem protection approach and specifically notes that Priorities A and B must be implemented in conjunction with Priority C. Incorporation of stormwater management programs into an integrated watershed planning approach is generally called for in Section D.1. The watershed assessments in A.2 will help further this idea. The Partnership recognizes that addressing stormwater is a top priority for the region, that more work will be needed for stormwater issues and that the Action Agenda will need to be adjusted over time to refine the overall approach to stormwater management.</p>

Comment	Commenters	Response
<p>AKART standards should be required only when the technologies will achieve measurable improvements in environmental quality. Require advanced wastewater treatment where nutrient discharges degrade water quality. While updating AKART is a long a costly process, some commenters noted that AKART definitions should be updated to reflect advanced wastewater treatment. Some noted that wastewater treatment plants are currently meeting secondary treatment standards, as required by AKART. Others felt that AKART or better standards should immediately be applied to all new construction and for all remaining treatment plants by C.3 2020.</p>	<p>Navy, EPA, Ecology, Pierce Co., AWC, City of Everett, Herrera, Olympic Environmental Council, PPS, Puget Sound Environmental Caucus, RE Sources for Sustainable Communities, Jamestown S'Klallam Tribe, Northwest Indian Fisheries Commission, Squaxin Island Tribe, The Tulalip Tribes, Port of Silverdale, Washington Ports</p>	<p>There are divergent opinions on this issue. Some believe that more advanced treatment is warranted now. As Puget Sound faces some very serious water quality issues, the Action Agenda was written to indicate that the options for advanced treatment in specific locations or Soundwide must remain a possibility.</p>
<p>Create a wider focus on wastewater treatment plants that goes beyond federal facilities. Include provisions to address bio-solids, and identify infrastructure funding and ways of managing and prioritizing actions. Some commenters called for all treatment plants in Puget Sound to achieve zero discharge by 2020. C.3</p>	<p>Navy, Environment Canada, EPA, AWC, City of Everett, Herrera, Olympic Environmental Council, PPS, Port of Silverdale, Washington Ports</p>	<p>C3.3 was broadened to include more than federal facilities for the December 1, 2008 Action Agenda. Section E.2.2 addresses infrastructure funding. The comment about zero discharge will be considered with the benchmark examples listed in the Question 1 comments. Biosolids are not addressed in the action agenda and are noted as needing future consideration.</p>
<p>Consider including a call for local governments to establish comprehensive programs to control and prevent nonpoint source pollution. Address excess nitrogen from septic systems that reach shallow groundwater and vulnerable aquifers, and include Kitsap County PIC program as model local program. Clarify the extent that septic systems treat wastewater, including the removal of nitrogen, contaminants, personal care products. Provide necessary funding for implementation of on-site septic management plans to local jurisdictions. C.4</p>	<p>EPA, DOH, King Co., Kitsap Co. Health, City of Poulsbo, WRIA 17 Planning Unit, Jamestown S'Klallam Tribe, Citizen</p>	<p>Local governments have numerous programs to address non-point source pollution, notably NPDES permits and related requirements. An additional call would need careful scoping to identify what is missing from local programs and whether implementation support would address the intent of the comment. The word "groundwater" was added to C.4 for the May 2009 update. All actions in the Action Agenda need funding (see E.2) Kitsap County's program is considered a model for the region and is identified in the Action Areas profiles.</p>

Comment	Commenters	Response
<p>C.5 Clarify whether the Action Agenda will change the current process for prioritizing cleanups. Some commenters recommended considering cumulative effects to identify high priority cleanup sites on the Sound, and noted that the Toxics Loading Study is not an appropriate tool to aid in prioritizing sites. Implement and fund a source control program for toxic cleanup sites, and reference EPA's sediment cleanup goal for 2009-2013. Whenever possible, implement toxic cleanup in a manner that restores shoreline habitat. Clarify the public health risk and environmental protection basis for toxic cleanup standards. Ensure that accelerating cleanups does not happen at the expense of public review and comment.</p>	<p>Navy, EPA, Ecology, WDFW, WSEHD, PPS, RE Sources for Sustainable Communities, Citizen</p>	<p>The Action Agenda calls for refining the cleanup prioritization process as some comments have noted ecosystem factors that may warrant consideration. Detailed scoping is needed to determine the types of changes that may or may not be needed. The sediment cleanup goal comment will be considered with other benchmark ideas above. Implementing restoration with cleanup actions was added as C.5.3 to the December 1, 2008 Action Agenda. Cleanup projects are subject to state and federal environmental review. Any acceleration would not change that requirement.</p>
<p>C.6 Swimming beach monitoring should include both fresh and saltwater beaches. This work should also include research into the cause and control of cyanobacteria blooms, as well as the sources of bacterial pollution.</p>	<p>Tacoma-Pierce Co. Health, City of Kirkland</p>	<p>Expansion of the state swimming beach program to include freshwater areas could be considered for future action as warranted. Some local governments monitor freshwater lakes and beaches for health hazards.</p>
<p>C.6 Consider including tribal shellfish areas as well.</p>	<p>USCOE, Pierce Co.</p>	<p>This comment was addressed in the May 2009 update.</p>
<p>Question 3: Priority D</p>		
<p>D.1 Federal, state, and local agencies should improve coordination of their regulatory programs, and work together to leverage limited agency resources. Consider including NGOs and air quality organizations in this effort as well. Care should be taken to ensure that modifying statewide regulatory programs doesn't result in unintended consequences for existing programs, and doesn't add another layer of bureaucracy. Some commenters noted that the key issue is less about coordination, but more about enforcement.</p>	<p>Navy, NOAA, USCOE, USFWS, Ecology, WDFW, DNR, King Co., Snohomish Co., AWC, City of Bellevue, City of Gig Harbor, City of Kent, City of Kirkland, City of Lake Stevens, City of Mill Creek, City of Poulsbo, City of Redmond, City of Seattle, City of Tacoma, AWB, BIAW, CELP, MBA, PPS, Washington Realtors, Jamestown S'Klallam Tribe, Stillaguamish Tribe, Swinomish Indian Tribal Community, Washington Ports, Citizen</p>	<p>The intent of D.4.1 is to improve coordination of regulatory programs. The Partnership agrees that careful scoping and development are needed to avoid unintended consequences and more layers of bureaucracy, and ensure that all stakeholders participate in the effort. Enforcement of existing regulations before adding new ones was added as D.4.1.7 to the May 2009 update.</p>

Comment	Commenters	Response
D.1 Consider broadening the effort to develop and implement the Steelhead Recovery Plan to other biodiversity and related plans that are ready to be implemented.	NOAA, USFS, WDFW, City of Normandy Park, HCCC	For the December 1, 2008 Action Agenda, the description of the Steelhead plan (D.1 (2)) was broadened to include multiple ecosystem benefits and build on existing plans.
D.1 Consider hatchery programs in light of ecosystem effects and needs. Many HSRG recommendations are complex and theoretical.	Wild Fish Conservancy, Citizen	Near-term Action D.1 (6) was modified to reflect this concern in the December 1, 2008 Action Agenda.
D.1 Much of the southern resident killer whale plan is already actionable, and actions are being implemented.	NOAA	Near-term Action D.1 (4) was modified to reflect this concern in the December 1, 2008 Action Agenda.
D.1 Clarify intent in developing workplans for species that do not have existing plans. As written, intent is unclear. Include recovery efforts required for many other species that are listed as threatened or endangered or as candidates for listing.	WDFW, SeaDoc Society	The work plan issue was clarified in D.1.3 of the December 1, 2008 Action Agenda. A near-term action is not associated with this action at this time.
D.3 Clarify that agencies within a Federal Puget Sound office would be prohibited from directly lobbying the Congressional delegation for funding. Some commenters questioned the need for this added level of regulation.	EPA, USFS, Washington Ports	Federal agencies are not allowed to lobby Congress, nor can lobbying be paid for with federal funds awarded under assistance agreements. The federal office would not have regulatory authority and would improve the efficiency of federal agency coordination and spending in Puget Sound.
D.3 Consider including MRCs in the effort to bring diverse stakeholder groups into ecosystem recovery, add them to the list of groups recommended for collaborative support. Provide funding for sub-regional and regional councils such as MRCs and the Puget Sound Recovery Council Lead Entity Program.	NOAA, HCCC, TNC, Salmon Recovery Council	MRCs are covered in Section D.3. They were added to the list of groups needing support in near-term action D.3(2). The Lead Entity Program is specifically called out as needing funding in D.3.1.
D.3 Consider including development and funding of a system that provides best information and technical support to local and tribal governments as they plan for growth while protecting natural resources of Puget Sound.	EPA, King Co., Pierce Co., San Juan Co. Council, City of Bellevue, City of Bremerton, City of Everett, City of Kent, City of Poulsbo, Washington Ports, Citizens	The Partnership agrees that providing accurate and timely information is essential. For growth related issues, this need is covered in A.1.4.2. The specific way to accomplish this would need to be developed.

Comment	Commenters	Response
<p>Federal Caucus should develop a joint federal work plan to support Puget Sound priorities and help the Partnership develop strategies and policies.</p> <p>D.3 This work plan should be coordinated with state and local plans</p>	<p>USFWS, USFS</p>	<p>The December 1, 2008 Action Agenda includes this item as D.3.5.1.</p>
<p>Description of different types of general permits is incorrect. Consider convening a stakeholder group to investigate opportunities to develop and use new permits to manage development.</p> <p>D.4</p>	<p>USCOE, PPS</p>	<p>The description of the general permits in D.4.1.3 was clarified for the December 1, 2008 Action Agenda. Convening a stakeholder group could be considered as a future action.</p>
<p>Claiify the recommendations of the Mitigation that Works Forum. More discussion is needed regarding the practical applications of strategies for larger scale mitigation and restoration efforts, including a possible watershed-based pilot program in conservation banking.</p> <p>D.4</p>	<p>Ecology, AWC, City of Everett, City of Kent, City of Poulsbo, CLC, Herrera, Olympic Environmental Council, PPS, Sierra Club, WFPA, Swinomish Indian Tribal Community, Citizen</p>	<p>Section D.4.2 was clarified for the December 1, 2008 Action Agenda.</p>
<p>Consider in-lieu-fee programs for more than just restoration projects, and clarify that ILF is a pilot program for aquatic habitats and would including effectiveness monitoring. Care should also be taken to describe the appropriate sources of money to pre-capitalize the program.</p> <p>D.4</p>	<p>USCOE, USGS, Ecology, CLC, MBA, PPS, Citizen</p>	<p>In-lieu-fee programs could be considered in the future. December 1, 2008 Action Agenda reflects the suggested clarifications (D.4(6)). The funds listed are those under consideration for the program.</p>
<p>Consider funding upfront SEPA reviews in designated urban centers within existing UGAs. Commenters noted that streamliing SEPA review may lead to ignoring the environmental review process, or at the very least to reducing the ability for public appeal.</p> <p>D.4</p>	<p>CTED, CELP, PPS, Washington Ports</p>	<p>Streamlined or changing SEPA review would need careful scoping and development to address the issues raised.</p>
<p>Strengthen the call for enforcement of existing regulations. Other commenters suggested that regulatory structures at all levels of government have stifled the ability of many to conduct good works for the Sound. The Partnership should explore the major environmental laws to identify inconsistencies, conflicts and bureaucracy that work against protecting the Sound.</p> <p>D.4</p>	<p>EPA, Ecology, WSU, City of Bainbridge, City of Redmond, City of Seattle, City of Tacoma, Boeing, Kitsap Home Builders, PPS, Puget Sound Restoration Fund, Whale Museum, Port of Seattle, Citizen</p>	<p>The May 2009 update includes enforcement of existing regulations in Section D.4.1 and near-term action D.4(1).</p>

Comment	Commenters	Response
<p>A team approach to field compliance is more practical than an integrated field compliance program. Compliance efforts should also include ensuring that regulatory agencies are properly applying rules and regulations, and that newly issued permits require compliance with standards in an enforceable period of time.</p> <p>D.5</p>	<p>Ecology, PPS, Preserve our Islands, PSA, Citizen</p>	<p>The concept of teams was added to D.5.1 for the December 1, 2008 Action Agenda. The compliance discussion was added to D.4.1.7 for the May 2009 update.</p>
<p>Question 3: Priority E.1</p>		
<p>Building a management system is a large task that will divert resources from more pressing issues. Consider waiting to construct the management system until more pressing issues are funded and underway.</p>	<p>Jamestown S'Sklallam Tribe</p>	<p>Developing the management system for the Puget Sound Partnership is required by legislation and cannot be postponed. The Partnership does agree that it is critical to move forward with actions in the Action Agenda at the same time the management system is being developed.</p>
<p>The salmon recovery adaptive management plan (MAMA) should specify which salmon populations are to be monitored, where, and by whom. Implementation of recovery plans should be coordinated across planning areas and across ESUs. The salmon recovery process overall needs to operate with more transparency and more direct involvement from stakeholders, and should not be lost in the shuffle of larger Action Agenda tasks.</p>	<p>NOAA, Washington Council of Trout Unlimited, Lummi Natural Resources, Squaxin Island Tribe</p>	<p>Salmon recovery and implementation of the salmon recovery plan (including development of the required monitoring and adaptive management plan) is a statutory requirement of the Partnership. Additional detail about the salmon recovery program was added to the introduction and Roles Appendix in the May 2009 update. These comments are being considered as the monitoring plan is being developed.</p>
<p>Clarify how implementation of the Action Agenda will be included in the GMAP process.</p>	<p>King Co.</p>	<p>The Partnership is subject to several performance audits from both the state government and the National Estuary Program. These performance requirements are part of the Partnership work plan but not included in the Action Agenda that is relevant to all stakeholders in the region.</p>

Comment	Commenters	Response
Ensure that accountability is based on more than just salmon recovery and that other species are considered in the context of the full ecosystem.	AWC, City of Kent, Northwest Straits Commission, Starrfish Environmental Consulting, Wild Fish Conservancy	The performance management section in Question 3, E.1 covers the ecosystem. Also see the range of ecosystem indicators in Question 1.
Consider including outreach to groups that are designated as responsible parties for implementing Action Agenda items.	HCCC	The Partnership agrees that working cooperatively with those responsible for implementation is essential for success. This need is identified in Question 3, E.1 and E.4, as well as the roles appendix.
Federal, state and local agencies have nationally-mandated reporting requirements and lack the resources necessary to comply with new, additional reporting requirements for the Partnership.	USCOE, WSEHD, Pierce Co.	The state legislature mandated the reporting requirements to improve regional accountability. The Partnership recognizes that all agencies have other reporting requirements and staffing constraints. The Partnership will work with agencies to be as efficient as possible in terms of reporting. This was identified in December 1, 2008 Action Agenda and is covered under near-term action E.1 (4) in the May 2009 update.
Consider using the information management working group to define a set of information exchange protocols and standards for sharing activities and performance information.	Ecology	An information management working group could consider these and other tasks. See Section E.1.5 in the May 2009 update.
Question 3: Priority E.2/Funding/Financing		
Consider preparing proposals for funding aligned with economic stimulus funding. Work with other state agencies that have the lead for infrastructure finance.	EPA, City of Poulsbo, PPS	The need for federal stimulus funding is broadly covered by Section E.2 and occurred in the winter and spring of 2009.

Comment	Commenters	Response
<p>Funding strategy as presented is extremely limited in detail. Cost estimates for three categories of current spending are inaccurate. In addition, all implementation costs to local communities and the Puget Sound region should be calculated and included in the implementation cost estimate. Include the cost of housing and affect on various businesses, existing and future. Consider the triple-bottom-line approach.</p>	<p>CTED, King Co., Pierce Co., Skagit Co., Thurston Co., WSAC, AWC, City of Bainbridge, City of Kent, BIAW, Chimacum Grange, PPS, Puget Sound ESA Business Coalition, Washington Realtors, WSPA, PSRC, Jamestown S'Klallam Tribe, Citizen</p>	<p>The Partnership agrees that the funding strategy will need more specific detail over time. Detailed implementation costs, particularly for local communities will need to be developed as more specific implementation details are refined. The triple bottom line approach reflects the intent of the Partnership and is difficult to calculate at this time as much of the data does not exist. More detailed funding work products were created as appendices to the December 1, 2008 Action Agenda.</p>
<p>Overall funding strategy is not bold enough to be effective at restoring Puget Sound. Funding approach should send a clear message to the public that the cleanup of Puget Sound will be expensive and all will be required to pay for it. New revenue sources will be needed, and some commenters favored a direct, dedicated source of funding with a strong nexus to the problem.</p>	<p>King Co., City of Seattle, PPS, Jamestown S'Klallam Tribe, Citizen</p>	<p>The funding strategy, like the Action Agenda, will be refined and further developed. The importance of new revenue, including a dedicated source, is identified in the funding section. The public messages regarding funding needs must convey the importance of Puget Sound, as well as long-term nature of protection and recovery.</p>
<p>Carefully research which types of incentives can best achieve the environmental and policy goals.</p>	<p>EPA, City of Bellevue, City of Kirkland, Citizen</p>	<p>The Action Agenda notes the importance of incentives in Question 3. We agree that better identification of incentives for achieving specific outcomes would be helpful. Matching incentives to specific sectors and goals is identified as a future action.</p>
<p>Consider how to make progress on Puget Sound issues if funds are not available. Existing monies spent on Puget Sound-related recovery should be evaluated, prioritized, reorganized and reallocated.</p>	<p>WSDA, AWB, Boeing, BIAW, North Cascades Conservation Council, Puget Sound ESA Business Coalition, WPC, WSPA, Jamestown S'Klallam Tribe, Citizen</p>	<p>Some of the funding strategies and actions presented in Question 3, E.2 reflect the concept that progress can be made in some areas without spending additional funding by prioritizing and reallocating existing funds. Section E.2 in the December 1, 2008 Action Agenda reflects this comment.</p>

Comment	Commenters	Response
<p>Consider providing financial support to local jurisdictions who are reluctant to implement monitoring programs for fear that they may uncover expensive problems they are unable to address.</p>	<p>City of Redmond</p>	<p>The consideration raised is important for local governments that often face serious resource constraints. It will be considered as part of the over monitoring program.</p>
<p>Identify and secure funding for the work outlined in the Action Agenda, including NPDES stormwater permits, SMP updates, infrastructure retrofits. Local jurisdictions and Tribes will have difficulty meeting the goals of the Action Agenda with existing limited resources.</p>	<p>King Co., Pierce Co., Skagit Co., Thurston Co., WSAC, AWC, City of Bainbridge, City of Gig Harbor, City of Lake Stevens, City of Mill Creek, City of Port Angeles, City of Poulsbo, City of Redmond, City of Tumwater, Kitsap Home Builders, LWVWA, TNC, North Cascades Conservation Council, Puget Sound Environmental Caucus, Puget Sound Restoration Fund, Snoqualmie Watershed Forum, Surfrider Foundation, WRIA 17 Planning Unit, Swinomish Indian Tribal Community, PSRC, San Juan Islands Conservation District, Citizen</p>	<p>The Partnership and authorizing statute recognize that current funding is not sufficient for long-term recovery and protection of Puget Sound. The need to support local governments, tribes, and many others is called out in Section D.3 of the Action Agenda.</p>
<p>Other work must take place before funding a water quality trading policy, such as the identification of a TMDL for a pollutant suitable for trading. A number of suggestions were provided on how to structure a trading program. It was noted that nationally, trading programs have been difficult to manage and not highly protective of water quality. A stakeholder approach was suggested to develop this framework.</p>	<p>Ecology, King Co., Pierce Co., Skagit Co., Thurston Co., WSAC, AWC, American Rivers, PPS</p>	<p>The comments reflect considerations that will need to be addressed as a water quality trading program is developed.</p>

Comment	Commenters	Response
Engage private farm and forest landowners in an open and constructive discussion of their needs, concerns and ideas in structuring an ecosystem marketplace to take advantage of the immense ecosystem market supply opportunities.	Citizen	The Partnership recognizes the Legislature's interest, with the passage of SB 6078 (2008), in the use of ecosystem markets for the protection of the environment and the promotion of agriculture. The Partnership will work with the State Conservation Commission, the agricultural community and other stakeholders on efforts to develop ecosystem service markets in Puget Sound.
Funding plan should include a stronger contributions from private and community organizations as well as businesses. If established, a Puget Sound district should be Soundwide and not comprised of several smaller districts.	King Co., Pierce Co., Skagit Co., Thurston Co., WSAC, AWC, Taylor Shellfish Farms	The Partnership agrees that funding from private sector and community organizations is important. In part, the Foundation for Puget Sound was set up to help implement this concept. The foundation is described in the Roles Appendix of the May 2009 update. A funding district would likely need to be soundwide and this will be further developed when legislation is created.
Consider the ecosystem implications of diverting funds from MTCA to fund the Action Agenda.	King Co., Pierce Co., Skagit Co., Thurston Co., WSAC, AWC, City of Seattle, Washington Ports	The Model Toxics Control Account (MTCA) is already funding portions of the Action Agenda, mostly around efforts to clean up and prevent toxic contamination (C.1 and C.5). It is not possible to determine the ecosystem implications of diverting MTCA funds to other Action Agenda priorities. However, the Partnership will be looking for opportunities to reauthorize MTCA funds to other higher priority actions within the Action Agenda.
Consider including the economic value that Puget Sound commercial ports and shipping activity bring to the regional and national economies. Also include benefits of the U.S. military and the creation of green jobs.	PSRC, Citizen	The Partnership recognizes the economic value of Puget Sound ports to the regional and national economy. Information on the economic benefit of Seattle and Tacoma ports has been added.
Question 3: Priority E.3/Biennial Science Workplan		

Comment	Commenters	Response
<p>BSWP is too aquatic focused. Scientific investigations on the conservation needs of priority upland species are necessary to ensure effective conservation and restoration of their habitats. Benchmarks, targets and science plan investigations appear to omit protection and restoration of high priority terrestrial species and habitats.</p>	<p>King Co., Pierce Co., Skagit Co., Thurston Co., WSAC, AWC</p>	<p>The Partnership recognizes that the terrestrial environment requires more consideration moving forward. This has been flagged as a future action.</p>
<p>Consider further refinement and expansion of provisional indicators, targets, and benchmarks as key components of the BSWP. Include a discussion of how indicator data will be collected and shared with the public.</p>	<p>King Co., Pierce Co., Skagit Co., Thurston Co., WSAC, AWC, PSA</p>	<p>Refinement of ecosystem indicators is identified in Question 1 of the May 2009 Action Agenda Update and as a near-term action in Question 3 E.3. See also Question 3, E.1 in the May 2009 update.</p>
<p>Historical data should include qualitative/anecdotal information, such as information about historical extent of kelp beds</p>	<p>King Co., Pierce Co., Skagit Co., Thurston Co., WSAC, AWC</p>	<p>The Partnership agrees that qualitative information is needed. This comment has been given to the Science Panel for future discussion and consideration.</p>
<p>Additional scientific work is needed in many areas, including: identifying a method to document trends in annual forage fish abundance; fish and shellfish monitoring for toxics, pathogens/indicator organisms, and biotoxins; ocean acidification, research and development for toxics reduction and safer alternatives; developing bioassay technologies and species to provide alerts to potential problems with drugs and their metabolites; greater understanding of water masses in Puget Sound and how upland water use affects Puget Sound water masses; greater scientific rigor to our understanding of stormwater management; detailed geological mapping of the glacial terrain of Puget Sound; conducting a water census to evaluate current and future water availability; and research into the safety of chemicals with results made widely available to businesses and the public.</p>	<p>DNR, USGS, WDFW, King Co., Pierce Co., Skagit Co., Thurston Co., WSAC, AWC, City of Olympia, Puget Sound Environmental Caucus, PPS, Lummi Natural Resources, Citizen</p>	<p>These ideas were not identified as a high priority near-term research needs but can be considered for the next revision of the BSWP. They are under consideration by the Science Panel.</p>

Comment	Commenters	Response
<p>Coordinated regional monitoring has proven to be very effective in identifying problems and appropriate corrective actions. Continuing this work is critical to accomplishing many of the near-term actions. Local governments need monitoring and assessment information that can be used to inform management actions.</p>	<p>Navy, NOAA, EPA, WSEHD, , WSDOT, Pierce Co., City of Bellevue, City of Kirkland, PPS</p>	<p>The Partnership agrees that the need for coordinated regional monitoring is essential, as is accessible information. This is called out in Question 3, Section E.3.1 and E.1.</p>
<p>Monitoring programs must be well designed and funded. The Agenda should identify the governance of a regional monitoring program, as well as establish a web based "data warehouse" for all scientific data, reports, etc. The program should use data from existing monitoring efforts and identify funding mechanisms for this continued work and other high priority research needs.</p>	<p>DOH, City of Seattle, MBA, PPS, Puget Sound Environmental Caucus, Puget Sound Monitoring Consortium, SeaDoc Society, NWIFC, Point No Point Treaty Council, Port Gamble S'Klallam Tribe, San Juan Islands Conservation District, Citizen</p>	<p>The Partnership agrees that monitoring programs must be well-designed and funded per Question 3, E.3. Governance of a regional monitoring program is slated to be decided in late May 2009. Use of existing data and programs to the extent possible is called for in E.3. The data system needs are discussed in the Action Agenda Section E.1.</p>
<p>Consider highlighting the Science Plan's education, training, outreach, and communication efforts so existing knowledge can be developed and integrated into a compelling story.</p>	<p>King Co.</p>	<p>Communication and outreach is not a primary function of the Science Panel. However, the May 2009 update Question 3, E.4 discusses the need to include science in explaining the overall story and actions needed for Puget Sound.</p>
<p>Modeling is essential to the success of the Action Agenda. These models are dependent on sufficient data.</p>	<p>Citizen</p>	<p>The Partnership agrees. This need is called out in the BSWP and the Action Agenda in Section E.3.</p>
<p>Highlight the need for both applied science and basic research in Puget Sound.</p>	<p>EPA</p>	<p>The Partnership agrees with this comment. It is covered in both the BSWP and Action Agenda Section E.3.</p>
<p>Consider implementing a citizen science program that uses volunteers to collect data.</p>	<p>Citizen</p>	<p>This concern is address in Action Agenda Question 3, E.4.</p>

Comment	Commenters	Response
<p>Priority should be given to conducting science that is useful and informative for decision makers. This requires the user community to help frame the research by identifying what information they need.</p>	<p>City of Seattle</p>	<p>The Partnership agrees with this comment. The cross-partnership advisory groups described in the Roles Appendix should help accomplish this need.</p>
<p>Include description of how indicators will be reported to NOAA for evaluation of ESA status.</p>	<p>NOAA</p>	<p>The Partnership assumes that this comment pertains to reporting for the salmon recovery plan. Those reporting details will be specified in that monitoring plan. The intent of the new data and information system is make indicator data more widely available than in the past when technology was more limited.</p>
<p>Question 3: Priority E.4</p>		
<p>Overall, the sustained effort for communication, outreach, and education of the public is critical to success.</p>	<p>USFS, San Juan Co. Council, AWC, City of Lake Stevens, City of Redmond, City of Seattle, Chimacum Grange, MBA, TNC, Northwest Straits Commission, Orca Network, PPS, SeaDoc Society, Sierra Club, Surfrider Foundation, Whale Museum, Whidbey Watershed Stewards, Jamestown S'Klallam Tribe, Citizen</p>	<p>The Partnership agrees with this comment. The revisions to Question 3 Section E.4 for the May 2009 update include more detail.</p>
<p>Strengthen K-12 environmental programs and education overall, as well as programs for post-12 students. Educators and volunteers should have consistent messages that promote conservation, stewardship, and Action Agenda priorities.</p>	<p>Environment Canada, USFS, San Juan Co. Council, AWC, City of Lake Stevens, City of Redmond, City of Seattle, Chimacum Grange, MBA, TNC, Northwest Straits Commission, Orca Network, PPS, SeaDoc Society, Sierra Club, Surfrider Foundation, Whale Museum, Whidbey Watershed Stewards, Jamestown S'Klallam Tribe, Citizen</p>	<p>The Partnership agrees with this comment. It was included in the December 1, 2008 Action Agenda. See revisions to Question 3 Section E.4 of the May 2009 Update for more detail.</p>

Comment	Commenters	Response
Consider expanding public awareness and education programs to people recreating on public lands, to forest stewardship in the lowlands, and to whale-watchers.	USFS, WSU, Whale Museum	Action Agenda Question 3, Section E.4 covers all people.
Provide additional detail on who will be responsible for each of the education near-term actions, as well as timeframes for expected outcomes.	PPS	Implementer responsibility for all near-term actions was provided in the December 1, 2008 Action Agenda (Table 4-2). Outcomes for each near-term action and a performance measure will be identified as part of the workplan for the action.
Provide additional detail on how the Partnership will reach identified audiences. Consider adopting public participation strategies to gather stakeholder input similar to the Salmon Recovery Planning process, and linking education objectives to the Phase I and II Stormwater permits. Clarify the roles of the Education Working Group, EcoNet, and the Coordinated Network. Consider creating an Education Action Board and a Watershed Watcher organization.	EPA, Ecology, Pierce Co., City of Bellevue, City of Redmond, City of Seattle, Kitsap Home Builders, PPS, Skagit Conservation Education Alliance, Whidbey Watershed Stewards, Citizen	Revisions to Question 3 Section E.4 of the May 2009 update reflect this comment.
Consider focusing on social marketing to foster a change in personal behavior.	City of Redmond, Orca Network, PPS, Citizen	Revisions to Question 3 Section E.4 of the May 2009 update reflect this comment.
Linking restoration activities and community engagement creates synergy, reinforcing both activities. Consider tying this work into Conservation Districts, WSU Extension, local governments, and watershed based organizations.	NOAA, WSU, City of Seattle	The Partnership agrees with this comment. Question 3 Section E.4 was revised for May 2009 update and reflects this comment.
Action area profiles		

Comment	Commenters	Response
<p>A number of clarifications and corrections were suggested for the profiles, including ecosystem benefits, local threats of concern, the inclusion of specific programs or plans and clarification of implementers. A few specific clarifications are identified in the comment response summary because of their sensitivity.</p>	<p>EPA, USFWS, Ecology</p>	<p>The actions in the profiles reflect local input and a consensus of small working teams in each Action Agenda about what to include that is important to their area. Some people in the local communities and/or working soundwide do not agree with everything in the profiles. Overtime, the profile tables can be clarified and refined to better reflect local and soundwide understanding of threats and priority actions.</p>
<p>Profiles are less clear and complete in laying out a vision and plan for work in the sub-regions</p>	<p>DOH</p>	<p>The introduction and conclusion of the Profile section reflects this comment and identifies next steps for laying out local work.</p>
<p>Clarify intent of including "hunting practices" as a local threat to ecosystem benefits.</p>	<p>WDFW, Whatcom Co.</p>	<p>Hunting is covered as Harvest action in the threats column.</p>
<p>Clarify statement about hatcheries as both a benefit and threat.</p>	<p>King Co., Whatcom Co.</p>	<p>The profile tables reflect local information on both the benefits of providing fish via hatcheries and the threats that some hatchery practices can pose.</p>
Supplement comments		
<p>Provide additional clarification of timelines and schedules for refining indicators and benchmarks and developing work plans. Highlight the importance of these elements in the success of the Action Agenda. Clarify the responses or consequences for actions or inactions.</p>	<p>Citizen, NOAA/NMFS, City of Seattle, King County, People for Puget Sound</p>	<p>Question 1 and Question 3, E.1 were revised to better reflect the performance management system and a timeline for implementing it.</p>

Comment	Commenters	Response
<p>Provide additional time for comment on the supplement, as well as a formal SEPA and NEPA review of the document.</p>	<p>Citizen</p>	<p>The additional 30-day review was noticed via the Partnership website and e-newsletters in advance of the supplement. This meets the notice requirements of the National Estuary Program. A SEPA addendum to the Determination of Nonsignificance for Puget Sound Partnership's Action Agenda was prepared. The EPA determined that NEPA analysis for the supplement was not needed.</p>
<p>Develop transboundary indicators, relying on efforts of the Transboundary Ecosystem Indicators Working Group.</p>	<p>Environment Canada</p>	<p>This comment is being considered as part of the Phase 2 indicator work. It is also reflected in the November 2008 comments above.</p>
<p>Clarify the role of the Partnership and its interaction with various councils and boards. More detail on LC statutory responsibilities. Use the ECB in a more substantive way to develop programs and initiatives. Develop a formal structure for the ECB that documents advice to the Leadership Council with or without minority opinions. Rethink the Science Panel, which is building its own institutional structure. Include the role of other partners in implementing the Action Agenda, including local liaisons, tribal caucus, Salmon Recovery Council, PSNERP, Puget Sound Local Integration Task Force, Northwest Straits Initiative members, DNR, and Conservation Commission and districts. Continue to provide opportunities for input from partners as work plans are developed.</p>	<p>Citizen, NOAA/NMFS, NWIFC, WDFW, City of Seattle, King County, Northwest Straits Commission, Lummi Indian Business Council, Pierce County, People for Puget Sound</p>	<p>The statutory requirements of the Leadership Council were added to the Appendix on roles and responsibilities. The Salmon Recovery Council roles and membership were added to the Partnership structure. Several important implementer groups and agencies were also added, along with the Integration Task Force. The Partnership agrees that the Ecosystem Coordination Board plays an important role in the Partnership structure, particularly moving forward. The Appendix identifies that further clarification of roles will be identified by November 2009, and this could include (then or later) more formal documentation. As the ECB does not currently make consensus recommendations, the minority report concept is premature. Continued partner input on work plans and priorities is essential and called for in the Appendix. The section on Partnership staffing was updated and as identified in the text the role of local liaisons is being further clarified and will be more solidified by the fall 2009.</p>

Comment	Commenters	Response
<p>Include a reference to the Statement of Cooperation and Action Plan in the description of working with Canada, as well as the Coast Salish Environmental Action Plan.</p>	<p>Environment Canada</p>	<p>These references were added to the new Appendix on roles and responsibilities.</p>
<p>Figure 1 shows separation between the Partnership from its partners. Graphic should show two way communication, and should include caucuses.</p>	<p>WDFW, King County, Pierce County</p>	<p>The graphic was revised for the May 2009 update.</p>
<p>Figure 2 should show performance management and adaptive management as an iterative process.</p>	<p>King County</p>	<p>The graphic was revised for the May 2009 update.</p>
<p>Form additional caucuses or refine/expand existing caucuses, and announce caucus meetings publicly in advance. Counties should be considered a caucus, clarify the presence of a tribal caucus, form a property rights caucus, solicit a diversity of forest interests, and diversify the business caucus beyond AWB. To the extent that caucuses are eligible for grants, provide that opportunity to all caucuses.</p>	<p>WSAC, NWIFC, Lummi Indian Business Council. KAPO</p>	<p>The caucuses formed on their own initiative in part to provide broader input to the ECB member(s) representing the respective interest groups. Additional caucuses could be formed by implementer and interest groups if needed. Caucuses hold their own meetings and are responsible for any notification. While they are part of the Partnership in a broad sense, they are independent. Partnership communicated the desire for advance meeting notice to caucuses. The public is encouraged to contact relevant interest groups to find out how to participate and/or receive notice of meetings.</p>
<p>Increase outreach to the maritime industrial sector.</p>	<p>NSIA</p>	<p>The Partnership is willing to work with stakeholders and has met with this stakeholder interest group.</p>

Comment	Commenters	Response
<p>Clarify and emphasize the importance of tribal roles and participation on Ecosystem Coordination Board, in soundwide planning and implementation processes, as well as caucus meetings and cross-border discussions with Canada.</p>	<p>Lower Elwha Tribe, NWIFC, USFWS, Lummi Indian Business Council</p>	<p>The Roles appendix was modified in several places to reflect tribal roles. The appendix states that the Partnership expects federal, state, and local governments will also carry out their tribal trust responsibilities by working to ensure that tribal treaty rights are upheld. Some of the comments pertain to the government to government relationship with EPA. Those comments have been given to EPA to address. While the need for tribal participation in other soundwide planning processes is implied in the Action Agenda, it can be worked out with those other processes. The ECB may be one place to help ensure this happens. Tribal name meanings and Salish language spellings have been added to the profile tables as requested by NWIFC.</p>
<p>Clarify the purpose of the action area profiles. Conduct a NGO, community asset and business sector inventory in each action area and tailor priority actions and communications at the action area scale.</p>	<p>Citizen, Pierce County</p>	<p>The purpose and intent of the profiles is explained in the introduction and conclusion to the profile section. The type of assessment identified could be considered for each area as a future action.</p>
<p>Non-profit foundation should focus on engaging the public instead of providing information. Provide competitive grants to other organizations that specialize in engaging the public to make the most effective use of funds.</p>	<p>PPS</p>	<p>These comments were given to the Foundation for consideration as they develop their work plan. The Partnership works with the Foundation on communications and engagement and they are separate entities.</p>

Comment	Commenters	Response
<p>Consider specifically calling out biophysical sciences and social/human dimension science as critical elements in the Action Agenda and incorporate the subject into the Science Panel. These disciplines will be critical to performance management and to a more effective partnership with all interests outside the Boards.</p>	<p>Citizen</p>	<p>The Partnership agrees that social science and human dimensions are a critically important part of protecting and restoring Puget Sound, and that disciplinary expertise in those fields is necessary. The number of panel members is set in statute and the original membership was selected by the Washington Academy of Sciences per the statute. This comment has been conveyed to the Science Panel and will be considered as Science Panel terms rotate.</p>
<p>Dec. 1, 2008 Action Agenda comments</p>		
<p>Consider taxing products that contribute to stormwater pollution.</p>	<p>Citizen</p>	<p>This comment is already broadly covered in Question 3, C.1.</p>
<p>Ensure local jurisdictions have technical expertise to implement BMPs.</p>	<p>Citizen</p>	<p>This important need is already reflected in the Action Agenda in Question 3, C.2 and D.3.2.</p>
<p>Address the need to eliminate salmon fish farms. Increase the focus on hatchery raised salmon instead of focusing on building wild salmon stocks. Add more emphasis on the importance of salmon recovery and the Salmon Recovery Council.</p>	<p>Citizen</p>	<p>Fish farming is not a prevalent industry in Puget Sound. The Partnership leads the regional salmon recovery effort and there is broad agreement among scientists, tribes, state, federal, and local governments, businesses, NGOs, and many citizens that hatchery production has an important role in rebuilding some salmon populations. However, reliance on hatchery fish alone does not reflect current scientific understanding on how best to address this issue. The introduction was modified to add more detail on salmon recovery and the Council was added to the Roles appendix.</p>

Comment	Commenters	Response
<p>Focus on areas closer to Puget Sound rather than in rural communities. Support Smart Growth efforts on a regional and statewide basis, encourage growth in urban areas, and focus particularly on transit oriented development.</p>	<p>Citizen</p>	<p>Protection and recovery of Puget Sound requires different types of efforts in urban and rural areas. This need is reflected in the Action Area, Question 3 Section A. Encouraging growth in urban areas is already identified in the Action Agenda. The Smart Growth concept is broadly include in Question 3, Part A.</p>
<p>Balance regulatory change with land acquisition to accomplish long term recovery goals.</p>	<p>Citizen</p>	<p>The Action Agenda already includes this concept.</p>
<p>Emphasize programs that teach children about taking care of Puget Sound. Also support non-point education for municipal officials (NEMO program from U Conn Extension). Look at opportunities in social networking.</p>	<p>Pacific Marine Research, Citizen, City of Seattle</p>	<p>Question 3, Section E.4 was broadened for the May 2009 update and addresses this comment.</p>
<p>Identify and promote environmentally preferable alternatives to toxic chemicals currently in use in both residential and commercial applications. Pollution prevention is critical.</p>	<p>Citizen</p>	<p>The comment is already reflected in the Action Agenda. See section C, and specifically C.1.</p>
<p>Support stewardship incentive programs.</p>	<p>Citizen</p>	<p>The Partnership agrees with the statement and support for stewardship is already called out in Question 3 Sections A, B, C, D and E.4. No additional modifications were made.</p>

Comment	Commenters	Response
<p>Clarify discussion of low dissolved oxygen in the Whidbey Basin and reconsider associated actions to address.</p>	<p>City of Everett</p>	<p>This concern was discussed with the Department of Ecology. While consistently low dissolved oxygen concentrations in the Whidbey Basin could be partially due to natural processes, there are concerns that human influences from pollutants that affect DO concentrations. Ecology analysis indicates that there may be an increasing trend of DO exceedences in Possession Sound. Per Ecology's concerns, the language in Question 3, C.2 about the Whidbey Basin was retained and indicate where necessary to show that this area is being watched.</p>
<p>Action Agenda needs more emphasize on enforcement of regulations</p>	<p>PPS</p>	<p>D.4.1.7 was added to the May 2009 update to better reflect this need. It is also dicussed in the future actions section.</p>