

From: Martha Neuman [martha.neuman@psp.wa.gov]
Sent: Wednesday, February 01, 2012 9:04 PM
To: Ken Ghalambor; Elizabeth McManus
Subject: FW: KC_PSP Action Agenda Ltr 2_1_12
Attachments: OKEEFE_PSP_ATTACH1_2.docx; ATT00001..htm

Martha Neuman
Planning Manager

PUGETSOUNDPARTNERSHIP

p: 360.464.2005 | c: 360.628.2425

----- Forwarded Message

From: Gerry O'Keefe <gerry.okeefe@psp.wa.gov>
Date: Wed, 1 Feb 2012 16:04:55 -0800
To: Martha Neuman <martha.neuman@psp.wa.gov>
Subject: Fwd: KC_PSP Action Agenda Ltr 2_1_12

Please respond as appropriate.

Gerry O'Keefe
Executive Director
PUGET SOUND PARTNERSHIP

p: 360.464.1228
c: 360.593.6620

Via iPhone

Begin forwarded message:

From: "True, Christie" <Christie.True@kingcounty.gov>
Date: February 1, 2012 4:00:35 PM PST
To: Gerry O'Keefe <gerry.okeefe@psp.wa.gov>
Cc: "Jarrett, Fred" <Fred.Jarrett@kingcounty.gov>, "Smith, Megan" <Megan.Smith@kingcounty.gov>
Subject: KC_PSP Action Agenda Ltr 2_1_12

February 1, 2012

Mr. Gerry O'Keefe
Puget Sound Partnership
326 E D Street, Tacoma, WA 98421

VIA Electronic Mail: actionagenda@psp.wa.gov <<mailto:actionagenda@psp.wa.gov>>

Dear Mr. O'Keefe:

Thank you for the opportunity to comment on the Dec. 9, 2011, draft of the Action Agenda. King County continues to support the Puget Sound Partnership (PSP) and the urgent need to protect and restore Puget Sound, a national resource upon which the quality of life and prosperity of our region depend. With responsibilities for land use, transportation, stormwater, and wastewater, King County is keenly interested in connecting with and being informed by the recovery actions and strategies being proposed at a Puget Sound scale.

On the whole, we are impressed by the amount of detailed information contained in the document, and appreciate the hard work that has gone into its production. It builds on the 2008 Action Agenda, and appears to reflect legislative mandates as well as comments by the Joint Legislative Audit and Review Committee Report--such as the need to establish targets and link actions to them. It is obviously challenging to take on a task as complex and all-encompassing as Puget Sound recovery, and the PSP staff team should be commended for the effort they have taken to ensure a collaborative and thorough process.

Nevertheless, we have some concerns with the draft Action Agenda Update and have suggestions for further revisions that would help to chart a clearer path to successful implementation, summarized below. You will find enclosed as 'Attachment 1' more detailed staff comments organized by the five categories requested in the "Letter to Reviewers" as well as comments on the funding strategy and the science plan.

- Focus on critical near-term actions and path forward. While comprehensive, we believe that the document does not clearly convey the key actions that are critical to put Puget Sound on a path toward recovery. The document's length, structure, and terminology make it difficult to use as a call to action or guide to next steps for state agencies, Tribes, local governments, NGOs and residents. We understand that the structure of the document was influenced by the need to be responsive to legislative direction, consistent with the format of the previous Action Agenda, and attentive to numerous stakeholder concerns. However, we think it is essential that the Action Agenda include a short list of easily understandable, but significant, actions that are clearly necessary to restore Puget Sound. The concept of "strategic initiatives" introduced in this update may be a start; but they should be linked to recovery targets, include a description of implementation challenges (including funding), and recommend next steps for overcoming those challenges.
- The NTAs should focus on the most critical actions, and highlight the funding needed for implementation: The overall number and varying specificity of NTAs does not clearly establish a "change agenda:" many of the NTAs appear to remain in the Action Agenda because they suffer from lack of implementation. Many are unfunded, so the likelihood of their implementation over the next two years is unlikely, despite the inclusion of responsible parties and performance measures. A shorter list should better serve the need to focus on critical actions, highlight their funding needs and other barriers to implementation, and address accountability.
- The proposed prioritization process should not detract from focusing on critical actions: We appreciate the work the PSP has done to develop a process that is transparent and replicable and meets the mandate to prioritize NTAs. However, we are concerned that a survey approach, even through the structured process that you describe, may prove difficult to administer and not answer key questions about how we should focus our resources across Puget Sound and sequence actions (please see Attachment 2, an e-mail sent to Gerry O'Keefe from Fred Jarrett on 11-7-11). We also continue to be concerned about how the prioritization process will

consider existing water quality mandates, such as stormwater permits, combined sewer overflow (CSO) controls, and Superfund cleanup.

- Develop viable funding strategy: We appreciate that the PSP is aware of the need for adequate funding but are concerned that the Action Agenda includes insufficient direction on how to move forward. More work is needed to quantify the costs for Action Agenda implementation, describe top priorities, document funding gaps, describe funding challenges, and develop proposals to overcome those challenges. We would like to see a document that lays out a clear framework for how funding for Puget Sound should be considered within the context of our region's economic recovery and other funding needs, including funds necessary to carry out existing regulatory mandates. The funding strategy should set appropriate expectations and set realistic timelines for what can be achieved. It should look for opportunities to coordinate activities with other regional initiatives and to create partnerships among government, businesses, and landowners. We are supportive of the creation of the Ecosystem Coordination Board funding committee and want to participate in the development an integrated, federal, state, and local funding strategy.
- Further integrate local actions. The cumulative impact of local government actions to manage land use and transportation, comply with regulatory mandates, and implement habitat protection and restoration projects is significant. We suggest the final document emphasize the critical importance of local actions in the NTA priority discussion and include in the prioritization process generalized NTA's, for example an NTA that calls for "... implementation of the highest priority salmon recovery habitat protection and restoration recommendations from WRIA plans."
- Clearly link state standards for local plans and regulations with recovery targets: The Action Agenda recognizes the importance of appropriately protective local land use plans, regulations and policies. Many of the NTAs associated with this, such as those under strategy A.1.2., call for the creation of model ordinances, identification of barriers to implementation, or provision of technical information. While these actions are helpful, we believe these may be insufficient to bring about changes that are needed sound-wide. There should be more emphasis on clearly aligning state standards for review and approval of local Shoreline Master Programs (SMP), local Flood Hazard Plans, stormwater programs, and land use plans with actions needed to achieve Puget Sound recovery targets. For example, SMP guidelines should clearly reference the recovery target for shoreline armoring, and outline local regulatory and programmatic actions that can be taken to achieve that target. Determining the appropriate mix of regulations, restoration, and protection actions is site-specific, but the outcome must be sufficient to meet recovery targets.
- Explain how the science plan will be implemented: The proposed biennial science plan provides a thorough list of needed scientific work, but does not explain how the plan will be implemented over the next two years. Which entities are responsible for what research? What is the approximate cost, and are funds available to do this work? We recommend that the science plan include an outline for prioritization and implementation.
- Reduce frequency of Action Agenda Updates; assess performance based on progress toward targets: Updates to the Action Agenda are a major investment of resources. We recommend updating the overall document less frequently, and rededicating resources to implementation. A shorter set of prioritized strategic actions and implementation plan could be updated more frequently to reflect changes in financial and regulatory circumstances. In addition, the goal to restore Puget Sound by 2020 may be unrealistic, given the complexity of the system, timeframes for implementation, and limited resources. We recommend more emphasis on milestones and performance measures to achieve progress and ensure that Puget Sound is on a path toward recovery.

Thank you again for the opportunity to comment. If you have any questions, contact me at 206-296-6500.

Sincerely,

Original Signed

Christie True
Director

----- End of Forwarded Message