

Section	Sub-strategy/NTA	Comment	Recommended edit
0 - General comment	logic model	Logic models difficult to read	Increase size of text, size of paper, or move to dedicated appendix.
1 - General comment	logic model	Some strategies likely easier to implement and others have huge constraints but these differences aren't apparent in model. Models are not well integrated with text. By 2020 where will we be in relation to implementing strategies?	Suggest some way of visually showing which strategies are higher priorities and/or which ones need more effort because they are difficult. It would be useful for the graphic to distinguish between what strategies can be done with a little effort or are already being done.
2 - General comment	NTA's	It is unclear where we are if all the NTAs and on-going work are done-- doesn't seem like the sum of the NTAs = total recovery so what does it equal?	Clarify where we will be once NTAs are complete. Will any targets/indicators be met?
3 - General comment	logic model	The section really doesn't get at what the major constraints to implementation are	Identify the major limitations to implementing recovery actions and describe if/how they are to be addressed.
4 - General comment	General comments	Overall, I'd like to have a better sense what things are we doing OK or are on the right trajectory and what things are we not making progress on that we need to.	Provide a more compelling overview of what we have learned since the last action agenda about where we are doing well and where we aren't.
5 - General comment	text boxes	The text boxes that highlight local strategies don't provide that much useful information given the amount of space they take up.	Suggest removing altogether or using more strategically for a specific purpose.
6 - General comment	Targets	There is no text accompanying the introduction of the targets to explain how they were developed, how they are intended to be used, or even whether all aspects of the targets are currently being monitored. The targets can be used to help us plan or bring focus to our work, but this is not the purpose for which the indicators were originally developed, and they do not represent all aspects of recovery that we need to consider. Moreover, some of the targets are incomplete as presented throughout the document, and seem to be using the simplification of targets that was included on the Vital Signs website; for example, the Toxics in Fish target refers solely to a single class of contaminants in the Action Agenda, whereas the complete target refers to a wider range of contaminants.	Include language to describe the indicator development and Target selection process, the purpose(s) of the targets, and a clearer evaluation of the adequacy of each target. Use accurate language to describe the targets in subsequent parts of the document (e.g., "target views")
7 - General	General	We know that preventing damage in the first place is more cost effective than restoration and has a more certain outcome (reflected in the guiding principles on page 19), yet there are many restoration actions included in the document.	Prioritization should favor actions that prevent damage in the first place, whether regulatory or other protections.
8 - General	General	On-going Programs are inconsistently treated - for some agencies the list seems overly detailed, for others major relevant on-going programs are omitted.	Develop a more consistent approach for including/omitting on-going programs.
How do we recover Puget Sound to health?	definitions of ongoing activities and near-term actions	This distinction is a fundamental assumption in this version of the Action Agenda, but these definitions are inadequate to guide the appropriate treatment of both ongoing programs and potential NTAs. There are too many subjective words in the definition of NTAs (e.g., high priority, new needed, high profile, large, critical) for it to be an adequate "filter" or set of guidance to determine what should actually be an NTA and what shouldn't.	Revise the definition of ongoing activities to reflect your more consistent approach for including/omitting on-going programs. Revise the definition of NTAs to be less subjective so that it can actually help revise or omit NTAs.
Climate Change		Please see separate Word document and attachments that were included in transmittal email.	

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A - Upland and Terrestrial	A.1.1	There should be a greater emphasis on the PHS and other sensitive wildlife areas identified by WDFW. These areas would then need to have local protection or acquisition to maintain the most sensitive fish and wildlife areas.	See specific instances listed elsewhere in WDFW comments where Priority Habitat and Species information should be appropriately referenced.
A - Upland and Terrestrial	A.1.1	WDFW PHS has identified important marine priorities based on spawning and bird habitat among others. In addition Pacific Flyway and salmon recovery plans have priority areas and habitats that have been specifically identified in Puget Sound.	See specific instances listed elsewhere in WDFW comments where Priority Habitat and Species information should be appropriately referenced.
A - Upland and Terrestrial	A.1.1	This section appears to be appropriately focused on issues primarily related to watershed development – managing growth in upland areas. It does not explicitly address the issue of nearshore protection and restoration referenced for this section in B1.1. For instance, WDFW work to identify important areas of marine and nearshore biodiversity as part of PSBC, and the work of PSNERP to identify locations for processed based restoration and protection don't appear as specific references.	It is more appropriate to address nearshore protection and restoration issues under B1 than to attempt fitting them into this section.
A - Upland and Terrestrial	A.1.1	The description of the Puget Sound Basin Characterization project is inaccurate and must be rewritten.	Change 1st paragraph to read: The Puget Sound Basin Characterization's (PSBC, or the Characterization) assessment of water flow, water quality and fish and wildlife habitats is a coarse-scale tool for identifying ecologically important areas. This assessment is a key step toward determining which areas are appropriate places for low-impact development, and which places should be protected from development. Applying the information in the Characterization should direct land development away from ecologically important areas and the results are used in several of the strategies in A1, A2, A3, and A4.
A - Upland and Terrestrial	A.1.1	Watershed characterization is not the only tool for land use planning.	Add text to this paragraph: In addition to the Watershed Characterization tool, use of the strategy assessment of the Puget Sound Nearshore Ecosystem Restoration Project, maps produced by the Washington Wildlife Habitat Connectivity Working Group, and the Puget Sound Salmon Recovery Plan, with each of its 14 watershed chapters should help to tailor information to each watershed and support decisions for what areas to protect.
A - Upland and Terrestrial	A.1.1 - On-going Programs	The statement "The Natural Heritage Program is the only entity that collects and manages statewide ecosystem data" is not true. WDFW also collects data on components of ecosystems: fish, wildlife, and habitats.	Develop a more consistent approach for including/omitting on-going programs. In addition, P. 35, Second Paragraph. Please amend as follows: The Washington Department of Fish and Wildlife (WDFW) maintains a number of GIS databases that contain information on the known location of Priority Habitats and Species (PHS) in Washington State. PHS is a source of best available science that can inform local planning activities, development projects, conservation strategies, incentive programs, and numerous other land use applications. This data has also been used in several landscape assessments including The Nature Conservancy's ecoregional assessments, the Biodiversity Conservation Opportunity Framework Maps and the Puget Sound Basin Characterization. This database is available on-line in an interactive map and management recommendations to guide how to protect priority habitats and species is also available on-line. Please visit, http://wdfw.wa.gov/conservation/phs/

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A - Upland and Terrestrial	A.1.1 - On-going Programs	The statement "The Natural Heritage Program is the only entity that collects and manages statewide ecosystem data" is not true. WDFW also collects data on components of ecosystems: fish, wildlife, and habitats.	P. 35, Second Paragraph. Please amend as follows: The Washington State Department of Natural Resources Natural Heritage database has spatial information about important native, intact, and rare ecosystems. The program has published a draft field guide to Washington ecological systems, available through the DNR website, and has key expertise in the state's ecosystems, including Puget Sound.
	A.1.1 - On-going Programs	Last sentence of first paragraph under "Ongoing Programs," add "Washington Department of Fish and Wildlife" after "The Nature Conservancy"	Modify text.
A - Upland and Terrestrial	A.1.1 - On-going Programs	Too much emphasis on the products of the watershed characterization project. There are other data and high-quality assessments that should be used for land use planning	Develop a more consistent approach for including/omitting on-going programs.
A - Upland and Terrestrial	A.1.1 - Science Needs	PHS inadequately referenced.	Amend "WDFW priority habitats" to "WDFW priority habitats and species program"
A - Upland and Terrestrial	A.1.1.1	Are "regional ecosystem protection standards" defined elsewhere in this document? If not, is there definition widely understood and agreed upon?	This section would benefit from a callout box or other explicit description of what these standards are, and how they can be developed in a way that leads to their use at the local level.
A - Upland and Terrestrial	A.1.1.2	Do not agree with this as an NTA. This was not recommended by the IDT and does not seem "near term worthy." It seems like a grant deliverable that is already funded for the Puget Sound Characterization project. The technical assistance team will be providing the outreach and implementation support and Ecology already planned to house the maps on-line. How will having this data accessible on-line reduce the impact on ecological systems? I can provide examples for how PHS on the Web has resulted in such outcomes, but the Characterization really requires technical support to implement	The Partnership will work with local, regional, state and federal stakeholders to define ecologically important and sensitive areas and continue to develop and refine the Puget Sound Characterization and its ecosystem-based framework for organizing, integrating and interpreting physical and biological data and information. The Partnership should work with the organizations mentioned to identify whether there is actually a need and how it is different than other efforts we are currently investing in.
A - Upland and Terrestrial	A.1.2 - On-going Programs	Technical assistance to local jurisdictions inaccurately characterized.	Amend as first sentence of second paragraph as follows: "Currently, Ecology, WDFW and Commerce provide ongoing technical assistance to local jurisdictions to develop and adopt planning goals and policies that incorporate ecosystem characterization information and protection strategies. Ecology and Commerce are also co-leads on the Watershed Protection and Restoration Grant, providing pass-through money to local jurisdictions to implement the Puget Sound Characterization."
A - Upland and Terrestrial	A.1.2.1	This is an ongoing project that is already funded. How is this a near-term action that is improving recovery if it's already a given? And how will this deliverable differ from the currently proposed A.1.1. NTA 2 (see comments above on A.1.1. NTA 2)?	Modify NTA to address new actions not currently underway, or move this NTA to On-going Programs.
A - Upland and Terrestrial	A.1.2.2	If you are going to list one federal plan, you must list them all – Puget Sound Chinook recovery plan, WDFW Wildlife Areas HCP when approved by USFWS, but I would not recommend including any. The statement "that are consistent with protection and recovery targets" should address inclusion of existing federal priorities.	Please amend as follows: By 2013, Ecology and Commerce will develop and distribute a set of local model planning land development and growth policies and goals that are consistent with protection and recovery targets and the Growth Management and Shoreline Management Acts.

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A - Upland and Terrestrial	A.1.2.3	The failure of a local jurisdiction to incorporate watershed characterization information is not a barrier to incorporating policies that are consistent with implementation of the Action Agenda.	Modify text : By end of 2012, Ecology and Commerce will work with local governments to identify the primary barriers to incorporating policies consistent with implementation of the Action Agenda and identify assistance needed to overcome these barriers; including understanding how protection strategies, and encouraging compact growth patterns, increased density, redevelopment and rural lands protection can be better incorporated into land use decisions.
A - Upland and Terrestrial	A.1.4.1	This was not recommended by IDT. The recommendation was: "Convene a workgroup to measure the effectiveness of CAOs and SMPs at focusing land development away from ecologically sensitive areas."	Modify NTA to reflect recommendation of IDT.
A - Upland and Terrestrial	A.2.1 - On-going Programs	Should further emphasize USFWS Section 6 and other WDFW acquisitions for shoreline and wetland protections.	Identify WDFW land acquisitions through USFWS Section 6 and other funding sources as On-going Programs.
A - Upland and Terrestrial	A.2.1.5-6	These actions appear to be more appropriately cast as LNTA's	Modify text.
A - Upland and Terrestrial	A.3	Impacts to fish habitat not referenced.	Amend text to read "...impairs functions of <u>fish</u> and wildlife habitats ..."
A - Upland and Terrestrial	A.3 "Analyses indicate that an acre converted from agricultural to urban development produces ten to fifteen times the runoff and runoff-borne pollutants, including far higher concentrations of heavy metals, petroleum and other key pollutants."	Where is the citation for this statement? This seems much more specific than a literature review completed by Christopher May in 2009, "Watershed Processes and Aquatic Resources: A Literature Review." "In several extensive studies of urbanizing streams in Wisconsin, a significant relationship was found between watershed land use and instream habitat as well as stream fish communities (Wang et al. 1997; Wang et al. 2000; Wang et al. 2001). In these studies, stream fish abundance and diversity both declined as watershed development increased above the 8 to 12 percent total impervious range. These studies also compared agricultural impacts to urban impacts, finding that urbanization had more severe and longer lasting effects. Habitat destruction and water-quality degradation were found to be the main contributing factors to the overall decline in stream ecosystem health. In addition, natural riparian vegetation (buffer) conditions had a significant influence on instream habitat conditions and appeared to at least partially mitigate some of the negative impacts of watershed urbanization (Wang et al. 2001)." (May 2009, p. 42)	Verify accuracy of statement.
A - Upland and Terrestrial	A.5 - Protect and Restore Floodplain Function: The Challenge	Concerned that there is still no definition of floodplain in this document. The working group was struggling with the definition and PSP recommended putting this work off until the end. I thought that a working definition had been created. The definition should include what is a functioning floodplain and what floodplains are included in the 2020 target. Originally, the PSP only wanted to include large river floodplains. The document should clarify.	Clarify definition of floodplain, and which river systems are included.
A - Upland and Terrestrial	A.5 - Protect and Restore Floodplain Function: The Challenge	This background does not take into account urbanization which is a large component of loss of floodplain function in the Puget Sound. The document uses the word "flood risk reduction projects". This is really a broad term and its difficult to know what the term means. For example, does it mean building levees or reduce development.	Identify urbanization as explicit threat/challenge to floodplain protection and restoration. Clarify or change term "flood risk reduction projects".

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A - Upland and Terrestrial	A.5 - Protect and Restore Floodplain Function: The Challenge	The floodplain section really focuses on restoration of degraded floodplains. The Puget Sound area most of the large river floodplains are already degraded and urbanized. I would suggest focusing our energy on floodplains that are less degraded and developed.	We should focus on not destroying our intact floodplains by increasing regulation and not allowing new levee construction, dams that would affect river-floodplain connectivity, and not allowing development in the floodplain.
A - Upland and Terrestrial	A.5.5 - On-going Programs	The NRCS programs are much larger than these and they are not referenced.	Add relevant NRCS programs to list of On-going Programs. Also, Develop a more consistent approach for including/omitting on-going programs.
A - Upland and Terrestrial	A.6.1.1	WDFW not shown as owner even though the Performance Measure is "Continuous weir operation and monitoring of salmonids (adults, juveniles, and smolts) on the Elwha River".	WDFW should be 'secondary owner' or the Performance Measure is incorrect.
A - Upland and Terrestrial	A.6.1.2	Suggests that WDFW will need to be prepared for consultation & other involvement. Any room to add steelhead recovery needs into this?	Add steelhead recovery to recovery plan needs.
A - Upland and Terrestrial	A.6.2	Prairies and oak woodlands are the most imperiled terrestrial habitats in western Washington. New NTA needed.	A.6.2.1 WDFW to implement priority prairies and oak woodlands restoration projects.
A - Upland and Terrestrial	A.7	No near term actions identified for A7.1, A7.2, A7.3, A7.4. If no NTAs are identified for "Mitigation that Works", then it must not be very important. If it's not important, then why have it in the Action Agenda?	Develop NTA's for sub-strategies A7.1 - A7.4.
A - Upland and Terrestrial	A.8.1.1	"Ecology, with support from WDFW, will set flow rules in three remaining Puget Sound watersheds (WRIA's 16, 18, and 19). . " WDFW is secondary owner. Should it be WRIs 16, 17, and 18? (these are inclusive of West Hood Canal and westward around peninsula to Elwha). This could be an important action for Chinook and steelhead recovery because to potential for low summer flows being limiting factors. Steelhead's presence in freshwater for nearly two years means flow conditions are particularly critical to survival.	Re-assess list of watersheds. Identify WDFW as secondary owner.
A - Upland and Terrestrial	A.9	"Protect and Recover Salmon" needs to be updated to include more information about Steelhead, as this is the section where two near term actions, A9.2, 1 & 2, are called out.	Update "The Challenge" to reference steelhead.
A - Upland and Terrestrial	A.9.2.2	WDFW's Statewide Steelhead Management Plan has a strategy "Establish Network of Wild Stock Gene Banks" for achieving natural production goals. This NTA may be related that, but it is unclear. If so, and the fact that WDFW is "owner", the language of the NTA should be modified to reflect the agency's current intent.	Modify language of NTA to reflect WDFW's current intent regarding Network of Wild Stock Gene Banks, or clarify another purpose for discussion with the Department. Bob Leland is the Department lead.
A - Upland and Terrestrial	A5.3.1	Railroads have a large impact on floodplain function as they impact floodplain connectivity	Include rails in this NTA.
A - Upland and Terrestrial	A5.5 - On-going Programs	Family Forest Fish Passage Program acronym is 3 Fs not 2	Use FFFPP. Also, in that same paragraph, 4th sentence, replace constructing with correcting.
A - Upland and Terrestrial	A.10	There are close to 100 state candidates, could be that only 35 are in Puget Sound, but that seems low.	See species distribution by county to verify: http://wdfw.wa.gov/publications/00165/2011_distribution_county.xls
A - Upland and Terrestrial	A.10.1	Aquatic species recovery plans inaccurately referenced.	Please amend sentence as follows: "Existing aquatic species recovery plans include..."

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A - Upland and Terrestrial	A.10.1	The listed species are often associated with lost habitat relationships. This action agenda should focus on conserving and protecting those habitat features including remaining old growth forest, oak woodlands and prairies. Similar to the acquisitions and restorations identified earlier in the document this should include direct acquisition of the imperiled habitats, restoration of degraded habitats and regulatory mechanisms to avoid logging or developing these same habitats.	The near -term actions should focus on conserving and restoring these habitats. In addition a mitigation banking program for protection of the prairie habitats should be established
A - Upland and Terrestrial	A.10.1	WDFW also protects , acquires and restores the habitat of species as well.	Add "Protects, acquires, and restores habitat" to list of WDFW On-Going Programs. Also Develop a more consistent approach for including/ommitting on-going programs.
A - Upland and Terrestrial	A.10.1	Recovery plan for sandhill crane has no actions in Puget Sound Basin.	Delete it from document.
A - Upland and Terrestrial	A.10.1	WDFW may have management recommendations for 101 species but only 33 of those species exist in Puget Sound Basin and only 2 of the 5 priority habitats exist in the Basin.	Update text.
A - Upland and Terrestrial	A.10.1 - On-going programs	Technical assistance to local jurisdictions inaccurately characterized.	Delete bullet "Develop new and better databases..."; Replace with: WDFW puts a high priority on providing good biological information to local planners and decision makers to improve their ability to administer the Growth Management Act and other locally administered land use laws. (p. 41) WDFW will expand its efforts to help local governments use "best available science" in protecting important habitat. This will be done by providing good habitat mapping products to local planners and by working with them to ensure that their local GMA plans, as well as other local conservation programs such as "conservation futures" and open space property tax incentives, address the Species of Greatest Conservation Need, associated habitats, and conservation actions identified in the CWCS. (CWCS 2005, p. 253)
A - Upland and Terrestrial	A.10.1 - On-going programs	List WDFW's participation in the SMA and GMA activities of local governments.	Update text.
A - Upland and Terrestrial	A.10.1.3	The intent of this NTA is unclear as currently worded. Existing species plans do include action work plans. Is the intent to suggest that WDFW create action work plans for those species that do not currently have them? State listed species? The text needs to be much more specific; alternatively, I recommend removal if unable to make more specific for this near-term time period.	Modify the text to make it clear which species are being referred to and then discuss with DFW. Is the intent, for example, "WDFW will augment existing species plans by creating action work plans for state listed terrestrial and freshwater species without existing plans."

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A - Upland and Terrestrial	A.10.2 - On-going programs	The basin characterization is discussed in the land development chapter, but due to the biodiversity assessment should also be included here.	<p>Add the following On-Going Program:</p> <p>Local Habitat Assessment</p> <p>Washington Department of Fish and Wildlife biologists have developed a suite of habitat assessment tools. One of these ranks relative habitat value across a whole county or watershed. The Local Habitat Assessment (LHA) methodology produces a color-coded map that is easy to interpret and use to inform local land use planning initiatives at a variety of scales. The ranking is based on knowledge of animal locations (informed by priority habitats and species data) and indicators of habitat quality and impact, such as the condition of vegetative cover, road density, and the presence of development. For planning subareas or smaller watersheds, measuring up to several tens of square miles, the LHA focuses on the habitat needs of representative species, allowing finer definition of those parts of the landscape better suited for development and those better suited for continued emphasis on habitat. See the Lewis County page for an example of a Subarea LHA.</p> <p>WDFW has collaborated with several Puget Sound jurisdictions to produce LHA maps for whole counties, watersheds, or smaller sub-areas. Assessments have been completed in Skagit County, the Birch Bay watershed in Whatcom County, Kitsap</p>
A - Upland and Terrestrial	A.10.2 - On-going programs	The basin characterization is discussed in the land development chapter, but due to the biodiversity assessment should also be included here.	<p>Add the following On-Going Program:</p> <p>Puget Sound Basin Characterization:</p> <p>WDFW's LHA is being integrated into a Puget Sound Characterization that applies several ecological assessments including water flow, water quality and the Puget Sound Nearshore Ecosystem Restoration Project. The Puget Sound Watershed Characterization is a collaborative effort between Ecology, DFW, and the Puget Sound Partnership that covers the entire Puget Sound Basin. The project is producing landscape-scale assessments that provide scientific information on which areas are the most important to protect for water resources and habitats. The first phase, completed in 2011, is an Ecology's water resource assessment (flow and quality); the second phase, completed in 2012, is DFW's terrestrial and freshwater aquatic habitat assessments; and the third phase, completed in 2012, is a DFW assessment of shoreline habitats that will incorporate the Puget Sound Nearshore Ecosystem Restoration Project results. Each phase of the publication includes maps and a report to help local planners understand the assessments and use them in management decisions (see project website, http://www.ecy.wa.gov/puget_sound/characterization/index.html). Please note: Watershed Characterization is not designed for GMA planning only, but can be used to inform many planning activities, including SMPs or local incentive programs.</p>
A - Upland and Terrestrial	A.10.2 - On-going programs	This is a hodgepodge of stuff (biodiversity scorecard, conservation opportunity maps, Landscape, WDFW's data viewer, Biodiversity Conservation Toolbox, Biodiversity Project Web Site) that reflects this state's lack of organization and coordination regarding biodiversity conservation efforts.	Perhaps rectifying this situation should be an NTA?

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A - Upland and Terrestrial	Logic Model - Land Development	The logic model does not include the recovery target (dark green square)	Update logic model.
A - Upland and Terrestrial	Logic Model - Land Development	Intermediate results do not consistently line up with actions. The action is "Improve local gov ability to implement plans, regs and permits consistent with PS recovery." One intermediate results is "increased state technical support to locals" How? From where? Nothing in the text addresses how the state will increase its technical support to feed this action.	Update logic model.
B - Marine and nearshore	General	There is nothing in the strategies about developing new projects to address known problems that we are unable to address because of social constraints. This should be one of the highest priorities if we truly want to restore PS.	Consider how to get through impasse limiting development and implementation of solutions to known problems
B - Marine and nearshore	B.1	The wording of this strategy is confusing and unclear. How do population and economic growth catalyze existing efforts for protection and restoration? What connection is being drawn between these two things?	Reword strategy to deliver a clear message about the connections among these things.
B - Marine and nearshore	B.1	"establish protection/restoration priorities" is vague and there are lots of priorities out there.	Clarify types of restoration and protection strategies needed.
B - Marine and nearshore	B.1.1	B1.1. Background: I think that the opening paragraph for the B1.1. Strategy mostly hits the mark. That is, Marine and Nearshore NTA's need to be predicated upon general agreement around restoration and protection priorities. Recognizing that not all priorities identified by PSNERP, Salmon Recovery, local jurisdictions, etc. overlap completely, at least recognizing areas of overlapping priorities can serve to collaboration and shared efforts. Unfortunately, I think that this important first principle identified by the Interdisciplinary team (IDT) got lost in this review draft version.	Insert "new" NTA based on previous work of IDT: B1.1.1 Document priority areas for protection, restoration, enhancement, and managed growth for nearshore and marine ecosystems. The process will integrate and reconcile priorities for process-based restoration and protection with those areas important to salmon recovery, shellfish, and other natural resources. This list of sites will augment watershed restoration and protection priorities identified through Watershed Characterization (A1.1) and used to further support local planning efforts (A1.2). Performance Metrics: Puget Sound Partnership convenes task force to integrate priorities by July 2012. Maps or other documents identifying science-based priorities for protection, restoration, enhancement, and managed growth are completed for Leadership Council review by December 2013.
B - Marine and nearshore	B.1.1	Shoreline habitats assessment of the Puget Sound Basin Characterization project not listed.	Update text.
B - Marine and nearshore	B.1.1.1-2	If the recommendation to add "the old" NTA 1 back into this section is NOT followed (see the comment beginning "B1.1. Background..." above), then these two NTA's dealing w/ MPA's and MSP really don't follow strategy B1.1. Thus, B.1.1. would need to be rewritten to focus specifically on marine protection, dropping all of the background on shoreline planning and establishing regional nearshore priorities.	Insert "new" NTA based on previous work of ITR per previous comment
B - Marine and nearshore	B.1.2	Section weak-- on-going program is an example of activities under this section but fall short of comprehensively addressing project evaluation in a comprehensive way that can inform Puget Sound recovery- Can PSP and science panel take?	A NTA could be to identify an entity or mechanism for advancing this NTA. Otherwise, it is not that useful as is.
B - Marine and nearshore	B.1.2	The Puget Sound Coordinated Ecosystem Monitoring & Assessment Program recently approved formation of a Nearshore Workgroup.	Develop new NTA to Task Workgroup with developing a strategy to integrate status and trends monitoring with restoration project monitoring activities.
B - Marine and nearshore	B.1.2	New NTA needed	B.1.2.1 PSP and WDFW [add RCO?] will institute a tracking system for nearshore projects by the end of 2012 to enable future evaluation of the effectiveness of actions taken.

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B - Marine and nearshore	B.1.2 On-going Programs	Work of ESRP in this area not referenced.	Add on-going program description: "The Estuary and Salmon Restoration Program is working to develop a series of Rapid Assessment Protocols to provide a common set of minimum monitoring standards for restoration project investments".
B - Marine and nearshore	B.1.3	Earlier draft versions of AA included NTA's appropriate for this sub-strategy.	Revisit NTA's from 9/9/11 draft: B1.3 NTA 1: [PSP, WHO and local governments] will work with stakeholders to improve understanding of protection and restoration project benefits (add WDFW? WDNR?). Performance metrics were not described, but could include, development of curricula for target audiences, survey of public interest, values, and perceptions. B1.3, NTA 2 [PSP, WHO and local governments] will seek local support in stewardship for restoration sites (add NGO's, MRC's) Performance metrics not identified, but could include: Implementation of model stewardship programs for XX restoration sites in Puget Sound by 2014.
B - Marine and nearshore	B.2	What is difference between "Protect" and "Conserve"?	Clarify difference between terms or limit to one.
B - Marine and nearshore	B.2.1	Title of this section implies it is focused on priority nearshore process, but only focuses on shorelines. PSNERP has identified a number of priorities across all shoreform types. While addressing sediment supply should be a priority it is by no means the only priority that we need to address in relation to ecosystem restoration	Rewrite to include emphasis on addressing top restoration/protection priorities identified for each shoreform using ESRP and other existing funding mechanisms.
B - Marine and nearshore	B.2.1	As a mechanisms to accomplish B.2.1, PSP could work with funding agencies to get priorities (e.. PSNERP, watershed characterization, DNR prioritization etc.) integrated into evaluation criteria and other decision making processes so all sources of funding are working towards same goal	Expand B.2.1. to focus funding mechanisms/programs on priorities identified under (revised) B.1.1. Alternatively, create new NTAs (B.2.3) to emphasize this focus.
b - Marine and nearshore	B.2.1	This sub-strategy as worded depends on previous version of B.1.1.1	Insert "new" NTA based on previous work of IDT per previous comment
B - Marine and nearshore	B.2.1.1	NTA 1 doesn't seem consistent with NTA 2 which states goal of no net loss of ecological function. If the goal is no net lost of function, then only protection 10% of sediment supply in NTA 1 isn't enough. Why 10%?	If the intent is for SMPs to actually result in no net loss by 2014, should state that more explicitly.
B - Marine and nearshore	B2.2	The HPA data included in this paragraph is incorrect. It is from an informal estimate from several years ago that we provided for discussion purposes. This data is not accurate, and the data from the target analysis should be used.	Replace the incorrect data here with correct data from the target analysis.
B - Marine and nearshore	B.2.3	The completion of design guidance for armoring alternatives (Marine Shoreline Design Guidelines) is not identified, but it was included as a recommendation by the IDT.	Include Marine Shoreline Design Guidelines as specific on-going effort that is priority to complete.
B - Marine and nearshore	B.2.6 On-Going Programs	PSNERP has published the peer-reviewed technical report "Strategies for Protection and Restoration of Nearshore Ecosystems in Puget Sound (Cereghino et al., 2011). This and other PSNERP technical reports (available at www.pugetsoundnearshore.org) provide science-based information useful to agencies and local governments in informing planning and regulatory decisions. Geospatial data developed by PSNERP may also assist these efforts in incorporating best available science into decision support systems.	Identify PSNERP technical products under on-going programs.

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B - Marine and nearshore	B.2.6.1	This NTA did not come out of the Interdisciplinary Team process. The text of B2.6 talks about science-based tools to improve decisions. This NTA does not logically follow that intro. If streamlining is to be considered in this document, regulatory organizations should be involved.	Remove NTA or redesign to be consistent with the sub-strategy it falls under.
B - Marine and nearshore	B.3.1.1	Focus only on PSNERP 10% design projects but many other high priorities could be implemented through other mechanisms that are equally as important	Would phrase as ensure implementation of priorities identified by PSNERP including 10% design projects via Army Corps and other high priority actions through ESPR, SRFB, and other Puget Sound grant programs.
B - Marine and nearshore	B.3.1.1	Existing text that does refer to PSNERP is confusing.	Modify text: WDFW and the Corps will work to advance implementation of projects identified by PSNERP, including those described in the Strategic Restoration Conceptual Engineering – Final Design Report. Implementation will occur both through Corps programs as anticipated by the General Investigation process, and through other non-Corps federal, state, tribal, and local programs. Performance Measures: Final Feasibility Report for the GI completed in 2012. Implementation/funding strategy for non-Corps projects developed by WDFW and partners in 2013.
B - Marine and nearshore	B.3.1.3	Seems completely out of place and focused on water quality	Suggest moving to different section or deleting.
B - Marine and nearshore	B.3.4	It is untrue that state or federal lands necessarily provide restoration opportunity without acquisition investment or landowner negotiations. Many public lands were purchased with grant or other fund sources that place use restrictions/limitations on those lands, and if the use is not compatible with restoration, "replacement" lands must often be purchased. In addition, restoration projects usually require adjacent landowner negotiations as impacts are not restricted to the public ownership. Public lands are an important place to pursue restoration, but we must be realistic about the challenges these projects face.	Modify text to acknowledge that public lands MAY provide opportunities that do not require additional acquisition investment.
B - Marine and nearshore	B.3.4.2	How will DNR prioritize actions? There are already a number of priorities defined for restoration on public lands. How is this related to those existing efforts? Shouldn't different public land managers be engaged in an effort to prioritize work on their lands?	If this truly is new, it must be related to priorities established under (revised) B.1.1.1
B - Marine and nearshore	B.5.1.	New NTA needed	B5.1.1: Evaluate opportunities for public access compatible with protection objectives for sites acquired with public funds for conservation purposes. Prioritize shoreline public access funding at these sites. Performance metric: Public access consistent with protection objectives is implemented at 100% (?) of sites acquired with public conservation funding
Target View Estuaries		The target view of estuaries does not belong following "public access to shorelines" in the table of contents. The other target views seem to follow the sections that have the most to do with achieving the target. If that is true, the estuary target view should be nested in the marine and nearshore protection and restoration section.	Move this target view to somewhere in the marine and nearshore protection and restoration section. Probably after B2 or B3.
B - Marine and nearshore	B.6	Why is B6 called out separately from B7?	Clarify why B6 deserves to have a whole strategy focused on a single species or else roll into B7

Section	Sub-strategy/NTA	Comment	Recommended edit
B - Marine and nearshore	B.7	Motivation for this section refers primarily to healthy ecosystem function and diversity, yet all the ensuing recommendations and NTAs refer to species-specific recovery plans.	Need to identify appropriate treatment of species specific plans or goals in the context of a document and effort that is ecosystem based. Perhaps this can be achieved by improving the thinking about the role of (and goals for) biodiversity in the context of a healthy ecosystem.
B - Marine and nearshore	B.7.2	WDFW has PHS management recommendation for only 1 marine species. WDFW has no PHS management recommendation for any marine PHS habitats.	Update text.
B - Marine and nearshore	B.7.2.2	Under NTA 2 "rockfish" are mentioned. There are actually several species of rock fish that are federally listed or candidates for federal listing. Listed rockfish are yelloweye, canary, and bocaccio.	You might want to list them separately or say "13 species of rockfish" (including the candidates for listing).
B - Marine and nearshore	Logic model -- Shoreline Armoring (p. 133)	There are strategies that realistically can not be implemented without significant change.- It would be helpful to clarify which strategies can be implemented relatively easy and which will require a significant effort.	Differentiate between strategies that can be implemented relatively easily and which will required dedicated focus and which may practically not be implemented.
B - Marine and nearshore	Target View - Eelgrass	How is this target affected by the weed board's declaration of z japonica a noxious weed, which seems to allow or even encourage the reduction of eelgrass generally in Puget Sound?	Question only. Perhaps clarifying language would be helpful?
B - Marine and nearshore	Target View -- Herring	There is a mismatch between the target and the recovery NTAs. All recovery NTAs for this section are in B.3. Implement and maintain priority nearshore and marine ecosystem restoration projects. Most of the B.3. NTAs refer to PSNERP projects designed to recover shoreline, and removal of shoreline armoring and derelict nets. None of these projects directly impacts herring abundance in any obvious way. Although herring spawn in the nearshore it is not clear that shoreline armoring or other shoreline habitat changes have impacted herring reproduction. Further, it is not clear that herring abundance is in any way limited by the availability of undeveloped or restored shoreline. In addition, the stated primary concern re: herring is the decline of the Cherry Point stock, where little shoreline development has occurred, except for the industrial piers (which are not mentioned in B.3.). The bottom line here is that we could adopt all the NTAs in B.3. and there would likely be no effect on herring abundance. There is no single proposed NTA that is directly related to the stated target, Herring Abundance.	Recommend a thorough review of strategies and NTAs related to this target, but also all targets. This may require significant work and a significant revision of the existing draft.
B - Marine and nearshore	Target View - Shoreline Armoring	Similar to the above comment on the Target View for Herring: How confident are we that the strategies laid out here will really lead to a reduction of shoreline armoring as described in the Target View?	As above, recommend a thorough review of strategies and NTAs related to this target, but also all targets. This may require significant work and a significant revision of the existing draft.
B - Marine and nearshore	Target View - Shoreline Armoring	Figure legend inaccurate.	Modify text: "The graph below shows the change in shoreline armoring in Puget Sound between 2005 and 2010. "
B - Marine and nearshore	Target View - Shoreline Armoring	Text lists "implement and maintain priority floodplain restoration projects" as a relevant strategy but this target is about marine shorelines -- confusing.	Verify that A.5.3 pertains to shoreline armoring, or eliminate from list of related strategies.

Section	Sub-strategy/NTA	Comment	Recommended edit
C - Reduce and Control the Sources of Pollution to Puget Sound	TBD, possibly C11.5	The public supports control of pollution because of they cause harm to people and organisms. Though the Pollution section is appropriately focused on reducing pollutants in Puget Sound, it lacks any focus on identifying which pollutants are causing the most harm to organisms in Puget Sound. Not all pollutants are equally damaging to organisms. Because there are more toxic substances entering Puget Sound than we have resources to address, we should gather information about the harm that those toxic substances cause, and focus our limited prevention and cleanup resources on the most damaging pollutants. Unfortunately, this is an information gap that is preventing us from taking this strategic approach.	Include an NTA that calls for focused research to improve our understanding about which major pollutant in Puget Sound have the greatest effects on biota.
C - Reduce and Control the Sources of Pollution to Puget Sound	C.9	Several areas in this sections have placeholders for the "who" and I am not sure who will be deciding the lead agency or entity for these task.	Determine lead for unassigned NTA's.
C - Reduce and Control the Sources of Pollution to Puget Sound	C.9.5	With the Governor's Shellfish Initiative now completed, I assume the section on page 247 "Priorities in the Washington State Initiative" are being added?	Update C.9.5.1.
C - Reduce and Control the Sources of Pollution to Puget Sound	10.4.1	WAC incorrectly referenced.	The WAC 173-182 referenced is not correct....it should be WAC 173-183.
C - Reduce and Control the Sources of Pollution to Puget Sound	10.4.2	" Support baseline scientific data collection for key species at risk in oil spills to enhance assessments." This NTA is extremely importantbut I am concerned it may not specific enough..... we would like to work with the partnership to provide more explanation on the rationale rework this NTA if it looks like it is at risk of being lost during the upcoming prioritization process. I think we can provide more detailed rationally and identify more specific performance measures.	Modify text: " Support NRDAR planning and baseline scientific data collection for key species at risk in oil spills to enhance assessments and recovery.
C - Reduce and Control the Sources of Pollution to Puget Sound	10.4.2 - Appendix D	WDFW not shown as owner.	WDFW should be identified as a primary owner/co-owner or as a secondary owner of this NTA.

Section	Sub-strategy/NTA	Comment	Recommended edit
C - Reduce and Control the Sources of Pollution to Puget Sound	C.10	Environmental Restoration (or Recovery) should be included in the title strategy language or it should be made clear in the narrative that responding to spills includes the natural resource damage assessment and restoration process (NRDAR). Many of the key indicator species and recovery targets could be adversely affected by a moderate to large sized oil spill in the Salish Sea. We cannot avoid impacts from spills when they occur so it is imperative that we support strengthening and improving our NRDAR planning tools, the use of best available science, and collection of baseline data for key species and habitats to ensure that injured natural resources and ecological services are fully restored following spills.	Add "Ensure recovery of injured natural resources and ecosystem services impacted by oil spills."
C - Reduce and Control the Sources of Pollution to Puget Sound	C.10 - On-going Programs	The present role of ongoing programs and their relationship to the NTAs needs to be more fully fleshed out if they are going to be included in the final action agenda. In most cases the language looks like a last minute add to the latest draft and does not include some information. My group was focused on developing the near term action items and NTAs and was surprised to see the ongoing programs narrative added. We would like an opportunity to provide narrative on WDFW oil spills program and our roles.	Develop a more consistent approach for including/omitting on-going programs. Provide WDFW opportunity to update.
C - Reduce and Control the Sources of Pollution to Puget Sound	C.10.2.2	The local NTAs developed by the Straits ERN and Straits Action Area are too detailed/too many and need to be shortened to a couple of key areas and tied with the overarching NTA's.	Modify text.
C - Reduce and Control the Sources of Pollution to Puget Sound	C.10.3 - On-going Programs	On-going program inaccurately described.	Language should to be reworded to "Ecology will continue to implement stakeholder recommendations from the Pacific States/BC Oil Spill Task Force transboundary report"
C - Reduce and Control the Sources of Pollution to Puget Sound	C.10.3.1	WAC incorrectly referenced.	The WAC 173-183 referenced is not correct...it should be WAC 173-182.
C - Reduce and Control the Sources of Pollution to Puget Sound	C.10.4	We strongly support inclusion of this sub-strategy and the NTA's.	<ul style="list-style-type: none"> I would like to see the rationale for this sub-strategy beefed up a bit and I would like to work with ecology, the partnership and other natural resource trustees on edits. Strengthening NRDAR tools and getting adequate baseline to support NRDAR is key to ensuring restoration of key resources and ecosystem services.
C - Reduce and Control the Sources of Pollution to Puget Sound	C.10.4	We strongly support inclusion of this sub-strategy and the NTA's.	<ul style="list-style-type: none"> The Pacific States/BC Oil Spill Transboundary Report recommendations to Trustee Agencies and Tribes on NRDAR planning should be referenced to support.

Section	Sub-strategy/NTA	Comment	Recommended edit
C - Reduce and Control the Sources of Pollution to Puget Sound	C.10.4 - On-going Programs	There are a number of ongoing efforts in NRDAR planning of which WDFW is playing a key role. We would like an opportunity to help provide more specific narrative on ongoing programs activities as the process moves forward.	Develop a more consistent approach for including/omitting on-going programs. Provide WDFW opportunity to update.
C - Reduce and Control the Sources of Pollution to Puget Sound	C.10.4.2	Ecology is owner but seems like WDFW should play a big role here; for example, spatial-temporal presence and abundance of resident & migrating juvenile & adult salmon should be part of baseline for risk assessment.	Add WDFW as co-lead.
C - Reduce and Control the Sources of Pollution to Puget Sound	C.11.5.1	Because it is responsible for monitoring toxics in the ecosystem, add WDFW as a partner.	Add WDFW to the list of partners.
C - Reduce and Control the Sources of Pollution to Puget Sound	Logic model -- Toxics in Fish (p. 268)	The logic model for Toxics in Fish is unbalanced. There is too much detail in the Drivers and Pressures section (left side), and too little in the Impacts section (right side). Although prevention and cleanup of pollution is clearly important and critical, more emphasis should be placed on identifying key health effects of contaminants on organisms, and recovering health. Without this we run the risk of focusing limited resources on contaminants that may not be causing much harm, and missing contaminants that are causing great damage to fish and shellfish resources in Puget Sound	Modify logic model to place more emphasis on identifying key health effects of contaminants on organisms, and recovering health.
C - Reduce and Control the Sources of Pollution to Puget Sound	Target View -- Shellfish Beds	The shellfish section is focused almost exclusively on intertidal bivalve species and culture. Should other shellfish species and fisheries be referenced and/or highlighted such as Puget Sound crab, shrimp, urchins etc?	Clarify the definition of "shellfish" being used here, as other agencies (like WDFW) include other shellfish species and fisheries when using the term.
C - Reduce and Control the Sources of Pollution to Puget Sound	Target View -- Toxics in Fish	<p>Although the AA presents the Toxics in Fish targets for pollution, a number of the metrics in that Vital Sign are unfunded:</p> <ul style="list-style-type: none"> · the English sole reproductive impairment monitoring and assessment (related to estrogen-mimicking pollutants) · long-term monitoring of toxics in coho salmon (i.e. the tissue concentration endpoints) · any assessment or monitoring of toxics (as tissue concentration) in any other salmonid species <p>Conducting this status and trends monitoring will help us understand if the Action Agenda's focus on source control actions is having the restorative effects on biota that we anticipate. For example, "The Challenge" for section C.2 recognizes pre-spawn mortality of coho salmon in urban streams as an issue, but we are not conducting any monitoring to help us understand what aspects of stormwater or urban streams are causing this problem. Conducting the recommended Toxics in Fish monitoring would lay a foundation for this understanding.</p>	Include a science NTA that calls for conducting monitoring that is identified in the targets adopted by the Leadership Council.

Section	Sub-strategy/NTA	Comment	Recommended edit
D - Strategic Leadership and Collaboration	D.4	Linkages between the Action Agenda and Biennial Science Workplan are unclear both in the organization of the Action Agenda, but also in the content. Yet-to-be determined priorities and strategic focus of the Action Agenda should drive science/knowledge gap priorities.	Clarify relationship between these two documents
D - Strategic Leadership and Collaboration	D.4	Science and monitoring strategy is buried under an inappropriate heading "Strategic Leadership and Collaboration".	Suggest this strategy has its own section.
D - Strategic Leadership and Collaboration	D.4	Treatment of this strategy is inadequate. Science and Monitoring is described here as a component of the "Backbone for Recovery and Protection of Puget Sound" but it has virtually no NTAs. Recommendations in the Action Agenda are limited to continue ongoing programs. In many cases ongoing programs are inadequate to provide the Science and Monitoring needed for recovery and protection. Moreover there is no consistent or systematic message in the Action Agenda that the effectiveness of recovery actions be evaluated or monitored in any way.	Recommend NTAs to (1) recover lost capacity for and fill gaps in Science and Monitoring needed to support recovery targets, (2) identify effectiveness monitoring requirements and strategies for each recovery target. See also comment above regarding the relationships between the Action Agenda and the Biennial Science Workplan.
D - Strategic Leadership and Collaboration	D.5 - On-going Programs	There is mention of PSP and Lead Organizations and local partners. WDFW oversees Regional Fisheries Enhancement Groups.	Regional Fisheries Enhancement Groups should be recognized for their role in enhancing Puget Sound either in Ongoing Programs or in near-Term Actions. (For example in near-Term Actions – Eco-Net and STORM networks are recognized – the Regional Fisheries Enhancement Groups could also be recognized.
D - Strategic Leadership and Collaboration	D.7	New sub-strategy needed.	D7.7 Engage volunteers to undertake field studies and stewardship that contributes to the natural resource agencies mission to protect the health of Puget Sound.
D - Strategic Leadership and Collaboration	D.7.7	New NTA needed	D.7.7.1 PSP works with natural resource agencies to design and implement volunteer citizen science field studies and stewardship activities that support their natural resource management plans.
D - Strategic Leadership and Collaboration	D.7.7.1	New performance measure needed	Performance Measure: Design and plan citizen science volunteer activities with natural resource agencies in 2012 and launch in 2013.