



Point No Point Treaty Council

Port Gamble S'Klallam • Jamestown S'Klallam

February 3, 2012

Mr. Gerry O'Keefe, Director
Puget Sound Partnership
PO Box 40900
Olympia, WA 98504

Re: Comments on the draft 2012 Puget Sound Action Agenda.

Dear Director O'Keefe,

On behalf of the Point No Point Treaty Council (PNPTC) and our member tribes (the Jamestown S'Klallam Tribe and Port Gamble S'Klallam Tribe), we would like to provide the following comments the draft 2012 Puget Sound Action Agenda. To preface the following comments from the PNPTC, we wish to clearly state that this letter is an effort to communicate commonly held concerns. This letter does not, however, replace or supersede any comment or communications from the Jamestown S'Klallam Tribe (JKT) and Port Gamble S'Klallam Tribe (PGT) or from other Tribes in the Hood Canal and Strait of Juan de Fuca Action Areas.

We will focus our comments on the Hood Canal and Straits Action Areas. In general, we are pleased that information on the work done in the Hood Canal and Straits Action Areas is well-represented in the Action Agenda.

Strait of Juan de Fuca Action Area

Staff from the Jamestown S'Klallam Tribe (JKT) and Port Gamble S'Klallam Tribe (PGT) and PNPTC regularly attended and participated in the development of actions for the Straits Action Area for inclusion in the Puget Sound Action Agenda. The Strait Ecosystem Recovery Network, as Lead Integrating Organization (LIO) for the Straits Action Area, will be submitting comments on the draft 2012 Action Agenda. We contributed to and fully support the comments submitted by the Strait ERN; hence, we will not repeat them here.

Hood Canal Action Area

The Hood Canal Coordinating Council (HCCC) is a watershed-based council of governments, comprised of Jefferson, Mason and Kitsap County Commissioners, and Skokomish and Port Gamble S'Klallam Tribal leaders, and HCCC is the LIO for the Hood Canal Action Area. The HCCC is developing an Integrated Watershed Management Plan (IWMP) for Hood Canal and, at the same time, developed and facilitated a process to identify strategies and actions which will help inform the update of the Action Agenda. Staff from the JKT, PGT, and PNPTC regularly attended and participated in the development of the IWMP and Action Agenda.

Prioritization of actions still needs to be completed for the IWMP and the Action Agenda, but the processes did identify the strategies and actions which addressed 'very high' and 'high' pressures/threats in the Hood Canal region. We have attached a draft of the IWMP and Action Agenda Update which provides (1) a good focus for prioritization efforts and (2) a good 'crosswalk' between the IWMP and the strategies and Near Term Actions in the Action Agenda.

We suggest that the Partnership include the attached table as part of the Hood Canal Profile. We further suggest that implementation of the Local Near Term Actions (LNTAs) identified and presented in the attached IWMP and Action Agenda Update will contribute substantially to the recovery of the Hood Canal Action Area.

Prioritization Process for the Action Agenda

The Partnership is required to prioritize the actions required to restore Puget Sound. This is a daunting task, but we understand that the prioritization process will begin soon and is planned to be completed during spring 2012. We request that the PNPTC and our member tribes be informed and included in the prioritization process in a timely manner so we can effectively participate and contribute to this important process.

Strategic Initiatives

We support the concept that the Action Agenda needs Strategic Initiatives which focus recovery efforts during the next two years. Further, we agree that the Strategic Initiatives should focus on the protection of ecosystem components. The effective implementation of the three Strategic Initiatives proposed in the draft Action Agenda now, namely (1) protection of habitat in support of salmon recovery, (2) prevention of water pollution from urban stormwater runoff, and (3) protection of water quality and nearshore habitat from rural and agricultural runoff, would substantially advance the recovery of Puget Sound.

Many of the LNTAs identified for the Straits and Hood Canal Action Areas would fit well under the Strategic Initiatives. Examples for the Straits Action Area have been provided by the Strait ERN in separate comments to the Partnership. For the Hood Canal Action Area, some examples are listed below by Strategic Initiative:

Protection of habitat in support of salmon recovery

- Update Kitsap and Mason County and City of Bremerton Shoreline Master Plans
- Implement and enforce existing regulatory programs of the counties (SMP, CAO, County Comp.) and State (RCW's and WAC's)
- Permanently protect larger tracts of forests for their forest (ecological and community) values – e.g., Port Gamble/North Kitsap, Dabob Bay, Stavis
- Protect, foster and incentivize sustainable working forests and farms
- Implement 3-year habitat/harvest/hatchery work plans for salmon recovery
- Implement comprehensive floodplain management plans where they exist
- Work with WRIA Planning Units to implement priority actions

Prevention of water pollution from urban stormwater runoff

- Revision of development code to incorporate current stormwater management practices – specifically, adoption/implementation of most current Ecology stormwater manual
- Implementation of Pollution Identification and Control (PIC) programs
- Adoption of low impact development (LID) practices
- Prioritization of stormwater retrofits
- Retention of natural land cover as the most effective way to prevent stormwater runoff

Protection of water quality and nearshore habitat from rural and agricultural runoff

- Develop and implement a regional ambient monitoring program for the streams and shorelines of Hood Canal

Of particular importance to the Tribes is revising the State water quality standards to reflect up-to-date information about rates of fish and shellfish consumption in Washington by incorporating better information on tribal consumption rates. Hence, C1.1 NTA 3 'Water Quality and Sediment Standards Updates' could be included under either or both of the Strategic Initiatives addressing runoff.

In addition, a focus on increasing public awareness of ecosystem problems and solutions is also an essential component of the Hood Canal IWMP and Puget Sound recovery. So, we propose that Outreach be added as a fourth Strategic Initiative to the Action Agenda or that NTAs and LNTAs addressing Outreach be included under each of the three current Strategic Initiatives.

Consistency and Alignment with the Treaty Rights at Risk Initiative

The Partnership is engaging with the Puget Sound Tribes to address the issues identified in the Treaty Rights at Risk Initiative. The Federal agencies are working to finalize their response strategy to the Treaty Rights at Risk Initiative by spring 2012. This is an ongoing effort and is a bit out-of-synch with the development of the Action Agenda. It will be important to include in the 2012 Action Agenda the actions identified in the Federal responses to the Initiative (and the subsequent actions required of the State agencies). This will likely require an adjustment to the schedule of the Action Agenda, but effectively addressing barriers to salmon habitat recovery such as shoreline modifications, floodplain management, riparian management, stream flow, land use development, etc., is necessary for Puget Sound recovery. We look forward to continuing to work with the Partnership.

Funding

The Action Agenda outlines a suite of proposed funding actions for 2011-2013, all of which will need to be implemented. We applaud the Partnership's leadership role and encourage the Partnership to secure new sources of funding and to help determine how to use existing funding strategically and efficiently. We look forward to participating in the discussions and seeing that some of the funding addresses the issues identified throughout Puget Sound, including those identified in the Hood Canal and Straits Action Areas.

In closing, we appreciate the opportunity to comment on the draft 2012 Action Agenda and we look forward to working with the Partnership and others to take actions to recover Puget Sound.

Please let us know if you have any comments or questions.

Sincerely,

A handwritten signature in blue ink, appearing to read "Thom H. Johnson". The signature is fluid and cursive, with a large initial "T" and "H".

Thom H. Johnson
PNPTC Environmental Program Manager