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February 3, 2012

Gerry O'Keefe
Executive Director
Puget Sound Partnership
326 East D Street
Tacoma, WA 98421

Dear Mr. O'Keefe:

On behalf of the South Central Action Area Caucus Group, we appreciate the opportunity to submit comments on the December 9, 2011 draft Action Agenda Update. There has been a tremendous effort to organize the information contained within this living document, and it is a demonstration of the Puget Sound Partnership's commitment to recover Puget Sound through partnership with local entities.

The South Central Action Area includes WRIs 8, 9, and 10/12 and encompasses highly developed urban areas, rural areas, and resource lands of King and Pierce Counties. Last year our Local Integrating Organization (Caucus Group) spent considerable time working through the actions in the original Action Agenda to identify local priorities. In October we translated that work into a letter and local action table and summarized our highest priorities for inclusion in the Action Agenda Update. We also tried to make clear that "local" priorities for our action area include not only on-the-ground projects within our local area, but also Sound-wide actions by state agencies to tie standards for stormwater, shorelines, and floodplain management to recovery targets.

This letter today adds to the conversation we began in October. We were hoping to see integration of local priorities throughout the Action Agenda along with clear strategies and priorities for implementation. Integration of local actions could still be stronger and folded into the overall prioritization process. For example, a blanket near-term action calling for implementation of watershed-based salmon recovery plans should be added and folded into the overall prioritization process.

As the Local Integrating Organization for the South Central Action Area, the Caucus Group is interested in providing thorough and specific comments; however, our membership has only had the opportunity to meet once since the release of the Action Agenda. Given the

complexity and length of the document, the Caucus Group members have spent significant time providing comments on behalf of their own jurisdictions and organizations. What follows is a list of common themes across our membership. We respectfully request that you consider providing the Local Integrating Organizations with the opportunity to provide additional comments on the Action Agenda now that members have had a chance to "digest" the Action Agenda and respond individually.

The following comments are from our January 9, 2012 Caucus Group meeting and reflect the common themes across our member's response to the Action Agenda to date:

Reduce the list of Near Term actions and clarify the framework for implementation:

We appreciate the work done to establish a near term action (NTA) prioritization process that is information-based, transparent and replicable; however, we have significant concerns about the large number of NTAs and the lack of a clear, short list of priorities that can galvanize collective action by local governments, state agencies, tribes, NGOs and citizens.

Clarity is needed around the funding necessary to implement these actions and what entity is responsible. The framework provided in the Action Agenda does not clearly convey the work needed to protect and restore Puget Sound in the long run by leaving ongoing programs to a later prioritization process.

Legislators, businesses, and the public will be confused by seeing a vast array of near term actions, many of which may remain unfunded or unlikely to occur. Furthermore, many of the strategies and substrategies simply describe actions -many of which are in the realm of local governments-in a way that assumes they are just occurring without the need for further assistance.

The draft Action Agenda identifies parties to implement many of the Near Term Actions. This assignment of responsibility should be based on proper assumptions regarding funding and staffing; otherwise, there is a risk that expectations will be raised that do not also reflect the priorities of the entities that control the funding sources needed to accomplish the work. For example, the Puget Sound Regional Council is listed as the responsible party to complete a Transportation Stormwater Retrofit Program for the central Puget Sound (pages 188 and 495). While this is an important action and a priority in our caucus discussions, the work was not funded by the State.

We suggest that the identification of a shorter list of key actions and a more robust explanation of how the strategic initiatives will serve as a framework for these actions be developed. The Action Agenda should make it clear how the "Strategic Initiatives" are intended to be used: Will they provide priorities for PSP agency focus, other state agencies funding and priorities, local priorities, funding decisions, or as a means to group priority NTAs?

Simplify the document: The length and complexity of the document makes a thorough review of key actions very difficult, particularly for local jurisdictions without dedicated staff to undertake a thorough review. The Executive Summary should be a stand alone document where the key strategies and priorities of the Action Agenda are clearly outlined and can serve as a call to action.

Reduce the frequency and change the approach for future Action Agenda updates: Updating the Action Agenda requires substantial resources for both PSP and implementers. As a Caucus group we fundamentally believe that more resources should be focused on moving key priorities to implementation. The broader action agenda should have a longer shelf life; updating and prioritizing strategic actions and implementation plans can occur more often and allow adjustments in response to comparing performance against targets, and adapting to changing financial and regulatory climates.

Habitat protection, restoration and salmon recovery should be more clearly reflected: We highly support a commitment to fund and implement habitat restoration and protection efforts called for in the water-shed based salmon recovery plans. The salmon recovery section should have explicit NTAs, including implementing the Puget Sound Chinook salmon recovery plan and additional specific actions as provided by the watersheds and Salmon Recovery Council. We support implementing the highest priority actions that are based on science, and agreed upon by federal, state, and local governments that have been working across jurisdictional boundaries to bring watersheds back to health. We believe that healthy watersheds are necessary for a healthy Puget Sound. We are confident that many of the objectives to protect and clean up Puget Sound will be achieved by restoring habitat and other high priority, multiple-objective actions to recover salmon.

Emphasize Monitoring and Education: We are concerned that monitoring and education are included as actions for some strategies but not all. Monitoring and education are critical functions and are needed for all strategies. They should be listed as specific actions in each strategy or should be listed as over-arching strategies. In addition, these are areas where many of the partners can play a role across all of the strategies.

Emphasize and incentivize regulatory compliance: The topic of compliance is only listed in one place in the Action Agenda (C1.5. Increase compliance with and enforcement of environmental laws, regulations, and permits). This is an over-arching action that pertains to every strategy in the Action Agenda and should be so designated.

Develop a robust, integrated funding strategy: The Action Agenda has done a great job of acknowledging the need for protecting funding for programs; however, the cost of proposed actions far exceeds the available funding. Assessing the full cost of implementing the top priorities is paramount to achieve restoration of the health of the Puget Sound.

The Caucus Group offers the following suggestions for strengthening the funding strategy:

- Highlighting these costs and challenges in the action agenda is essential to advancing near term actions.
- Identifying gaps, clarifying the top priorities, and outlining funding challenges can all be presented in a comprehensive document that includes a funding proposal to address the challenges. A financial assessment of Action Agenda implementation that includes the cost of regulatory mandates should be completed and integrated in the final document.
- Filling the gap of state and federal financial investment is critical. For the South Central Caucus Group members, the high priority targets of stormwater retrofits and salmon recovery have been funded primarily through local sources. As evidence, the Stormwater Sub-Committee of the ECB concluded that local governments were funding over 90% of municipal stormwater work and recommended a significant increase in state and federal contribution to achieve a more balanced level to protect Puget Sound as a regional and national treasure.
- We are encouraged that the funding actions listed for 2012 involve an effort to increase financial capacity and involves a legislative strategy to adopt a local funding mechanisms as part of an integrated funding strategy; however, we should be looking for opportunities to link projects and seek multiple benefits (e.g. adjacent Superfund cleanup or habitat restoration) to ensure maximum benefit for our public investments. State and federal governments should be helping local governments implement protection, clean up and restoration by providing more funding for these projects. Federal, state, and local funding all need to work together to meet the challenges we face to restore Puget Sound.
- At the Puget Sound scale, the Partnership should be identifying the full range of regulatory requirements, investments and intended outcomes, and helping to convene a discussion about how these requirements and investments collectively generate the most benefit for Puget Sound.

These are just a few comments that reflect what we as a Caucus Group and individual local jurisdictions in our Action Area would like to see in the Action Agenda to guide our work for the next few years and provide a basis for funding decisions. Decisions we make now are critical to achieving the recovery of the Sound and we must begin with a clear path forward.

Gerry O'Keefe
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Thank you again for the opportunity to comment. We look forward to providing additional feedback as the Local Integrating Organization for the South Central Action Area, following our February 13th meeting.

Sincerely,

A handwritten signature in black ink, appearing to read "Fred Jarrett", with a long horizontal flourish extending to the right.

Fred Jarrett
Deputy King County Executive

cc: South Central Puget Sound Caucus Group Members
Martha Nueman, Planning Manager, Puget Sound Partnership (PSP)
Jeanette Doner, Program Director, Salmon and Ecosystem Recovery
Susan O'Neil, Ecosystem Recovery Coordinator, South Central Puget Sound Action