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Sent: Friday, February 03, 2012 11:10 AM
To: 'actionagenda@psp.wa.gov'
Cc: 'Joan McGilton'; 'marllam@aol.com'; 'Bill Pelosa'; Quinn, De'Sean; 'Susan O'Neil'
Subject: Action Agenda Update Comments

February 3, 2012

Puget Sound Partnership
326 East D Street
Tacoma, WA 98421

RE: WRIA 9 Comments on the Draft Update to the Puget Sound Action Agenda, December 9, 2011

On behalf of the WRIA 9 Watershed Ecosystem Forum, the citizen's group overseeing implementation of the Chinook salmon recovery plan for the Green/Duwamish and Central Puget Sound Watershed, I am providing comments on the December 9, 2011 Draft Update to the Puget Sound Action Agenda.

We greatly appreciate that the Puget Sound Partnership efforts to improve upon the previous Action Agenda with new recovery targets, a more robust set of strategies and clearer, more measurable actions, a clearer scientific basis, a better start at distinguishing ongoing programs to protect and clean up Puget Sound. The work of the Puget Sound Partnership is highly valued by WRIA 9 and that is why we are pleased to provide the following comments that we hope are found helpful and demonstrate our commitment to partner with the state in making Puget Sound healthy.

We are particularly pleased to see that the Update makes explicit inclusion of local priorities and actions and recognizes the critical role that local governments and our many stakeholders play in protecting and restoring Puget Sound. The update, however, falls short in showing a clear path to achieve salmon recovery in our and other watersheds. We suggest that the Update acknowledge that salmon recovery in Puget Sound is a watershed initiative, and that the Action Agenda treat salmon recovery as such. For salmon recovery to be successful, the actions necessary to recover salmon population must foster watershed-scale implementation. The Action Agenda must support implementing the Puget Sound Salmon Recovery Plan which embodies the highest priority actions that have been agreed upon by federal, state, and local governments and many stakeholders that have been working across jurisdictional boundaries in our watersheds to bring watersheds back to health. We believe that healthy watersheds are necessary for a healthy Puget Sound. Implementing watershed priority actions to recover salmon would be a major step toward Puget Sound recovery. Implementing the watershed-based salmon recovery plan that we prepared for WRIA 9, for example, will achieve the following multiple ecosystem objectives to recover Puget Sound:

- Clean up stormwater through regional stormwater retrofits
- Clean up toxics and improve estuarine habitat
- Restore and protect beach feeding processes
- Reconnect the river to its floodplain
- Re-establish historic fish passage to over 45% of the watershed area
- Recover threatened species, prevent extinction of species, and avoid future listings

These objectives will not be achieved through individual actions of individual agencies and governments. A watershed-based governance structure and funding strategy for identifying, prioritizing, implementing, and adaptively managing the diverse watersheds of Puget Sound needs to be a priority action for Puget Sound recovery and complement the overall Puget Sound recovery funding strategy.

We are pleased that WRIA 9 has been asked to participate on the Leadership Council's Ecosystem Coordination Board subcommittee to review local and watershed-based funding mechanisms as part of an integrated federal, state, and local funding strategy. Through our many years of experience investigating funding mechanisms to implement multiple-objective recovery actions, we are committed to helping the Partnership develop an integrated federal, state, and local funding strategy to present to the Leadership Council later this year. We believe that an integrated funding strategy will address much of the Update's current ambiguity for moving near-term actions from a list in the Action Agenda onto the ground. As such, we encourage the Partnership to include potential legislative actions "at the local level" (page 15), including that legislative action will be necessary to create a sustainable, dedicated funding mechanism and governance structure for watersheds to fund the priority strategies and near-term actions that each of the seven geographic action areas address in the chapter, "How are Local Areas Working to Protect and Recover Puget Sound" (beginning on page 301). The Update needs to not only talk about how local areas are working together at the Local Implementing Organization (LIO) scale, but more importantly it must provide a clear path for implementing actions. As the Update states on page 301, the scale of the LIO's geography makes the most sense for Action Agenda implementation. For example, in the case of the South Central Action Area in which WRIA 9 is an active LIO participant, we have worked very hard to identify:

- **10** priority strategies;
- **8** near-term actions to support the 10 priority strategies
- Linkages to the Action Agenda Recovery Targets (land development, wastewater, shoreline alteration, and stormwater); and
- Local contributions to the recovery of Puget Sound.

It is incumbent upon the Action Agenda Update to commensurately provide the means by which local governments, watershed organizations, and other key implementers will be enabled to implement the ten strategies, eight near-term actions, and sustain local contributions to Puget Sound recovery.

Moreover, to demonstrate a strong commitment to protecting and restoring Puget Sound we strongly recommend that the Update explicitly include:

- (1) Implementation of the Puget Sound Chinook Salmon Recovery Plan as a strategic initiative, and
- (2) Implementation of each watershed's three-year work schedules as a near-term action.

It is very clear in the Update that salmon recovery, floodplains, and three-year habitat work schedules are critical to the protection and restoration of Puget Sound. These are priority near-term actions of the South Central Action Area (page 366). The Update must show the Action Area LIO a clear path for implementing these priorities.

Finally, to help us understand how federal dollars are currently working to implement priority strategies and near-term actions of the Action Agenda, we ask that the Update include a summary of the highlights of the federal EPA grant outcomes and progress made of all projects funded in each of the eight funding grant types for Puget Sound. It would be especially helpful for the Update to correlate the grant funding to the explicit strategies of the Action Agenda that the products of the grants are seeking to accomplish and how lessons learned from the dollars used can be applied to other areas and entities of the Sound. For the more recent grants awarded, it would be helpful for the Update to include the outcomes expected from the federal dollars put toward these proposals and how the outcomes correlate to implementation priorities of the Puget Sound Action Agenda.

Thank you for the opportunity to comment on the 2011 Action Area Update. We look forward to continuing to work with the Partnership to recover Puget Sound to health. Please contact me with any questions about our comments.

Doug Osterman

Watershed Coordinator

206-296-8069 [additional contact information](#)

[Green/Duwamish and Central Puget Sound Watershed Salmon Habitat Recovery \(WRIA 9\)](#)

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