



KITSAP COUNTY BOARD OF COMMISSIONERS

Efficient, accessible and effective county services

February 3, 2012

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Re: Kitsap County Review and Comment on Puget Sound Draft Action Agenda Update
And the 2012 Prioritized List of Near Term Actions

Kitsap County appreciates this opportunity to provide comments on the above referenced document. We have enjoyed our working relationship with the staff, councils, boards and programs of the Puget Sound Partnership (PSP). We are encouraged to see that much of the Draft Action Agenda includes Kitsap County's professional input. We do not object to the three "strategic initiatives" on protecting habitat, preventing water pollution and protecting the quality of our rural and nearshore waterways. We understand these initiatives serve as the lens through which PSP priority investments will be considered for near term action (NTAs).

We cannot overstate the need for the final, updated Action Agenda and final list of near-term actions to become better aligned. For example, it does not make sense to invest in compacting development in Urban Growth Areas in one section of the Action Agenda while prioritizing greater stormwater management retrofitting in another section. We understand that not all actions nor programs will be realistically supported financially nor achieved politically in the next two years. It is therefore, more logical to invest time in these and other gaps, potential conflicts and oversights. Examples of where the updated Action Agenda has done a good job in consolidating actions is water quality improvements for on-site-septic systems and the maintenance and expansion of commercial and recreational shellfish beds.

We also stress the need for the final Action Agenda document to explain and describe the many acronyms (PSNERP, IWMP, PSBC, etc.) that are relied upon. Acronyms that lack explanation prevent us from thoroughly reviewing and commenting.

This past year in particular, Kitsap County contributed time, travel and resources so that several of our key leading technical staff and managers could provide local and regional perspectives in water quality, stormwater, nearshore protection, shoreline management, salmon recovery, land use and development. This Board supported that investment and continues to support to the Ecosystem Coordination Board (ECB) because Kitsap County regards Puget Sound as one the County's most important assets supporting employment, natural, cultural and recreational resources and public health and vitality. As the geographic centerpiece of the Puget Sound, Kitsap County and our neighbors on the Great Peninsula

2. Clearly identify and articulate three strategic initiatives. The examples provided may be the three to initiate the results desired and to develop a record of success so that future funding will not be in question, e.g., Chesapeake Bay Program experience. There needs to be a move away from silo planning/program approaches to a joint planning/integrated project development system. For example, one strategic initiative is the prevention of water pollution from urban storm water runoff. The current draft lists numerous near action tasks, many ongoing, and it is difficult to see how the integration of these efforts will achieve the desired result.
3. Reliance on local governments is crucial for the success of a healthy Puget Sound. In reviewing the targets and the near term actions, especially those related to land use, the implication is clear that local governments are a key resource in improving the Sound's health. Critical issues exist:
 - a. While well intended, is the development of model ordinances realistically worth the cost? Adoption is nearly always a local political process which requires significant public participation per the Growth Management Act and Shoreline Management Act, among several other laws. And, if adopted, is the jurisdiction free from appeals of the "model ordinance" under current state laws? If not, is the state or Puget Sound Partnership willing to take on the appeals process?
 - b. Stream lining the permits system is always a politically endearing idea, however the proposed Near Term Action (1.4) does not illustrate how it will, in fact, streamline the permitting system. If there is a desire to streamline permitting processes, look at the implementing system. For example, a shoreline permit for a dock requires local approval first, and then the state and federal government may issue a denial. Why not make the highest approving level the agency, in this case the Corps, issue a single permit?
 - c. The provision of watershed planning tools is commendable. Many jurisdictions lack the ability to model the impacts of development, even the best development, on a watershed basis. This modeling leads to the concept of what planning methodology should jurisdictions use in future comprehensive plan updates. If watershed based planning is to be the driver, then ensure state law is aligned to achieve this result. This will require counties and cities to take an interactive approach in watershed planning.
4. We understand that Salmon Recovery will be a major focus. Would the Sound be better served by identifying the "highest priority salmon recovery projects," e.g. culvert and fish-passage-barrier removals in the near term? This is a focused, achievable priority that gets results, provides visibility of success, and creates jobs.

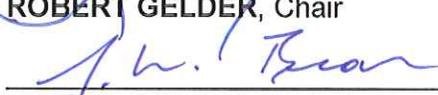
Once again, thank you for this opportunity to provide comment. We look forward to continuing a good working relationship with the Puget Sound Partnership.

BOARD OF COUNTY COMMISSIONERS

KITSAP COUNTY, WASHINGTON



ROBERT GELDER, Chair



JOSH BROWN, Commissioner



CHARLOTTE GARRIDO, Commissioner

Cc: Department of Community Development
Department of Public Works
Department of Parks and Recreation
Hood Canal Coordinating Council
Suquamish Tribe
Port Gamble S'Klallam Tribe
Skokomish Tribe
Point-No-Point Treaty Council
Alliance for a Healthy South Sound LIO
Interested Parties List