



STATE OF WASHINGTON
CONSERVATION COMMISSION

PO Box 47721 • Olympia, Washington 98504-7721 • (360) 407-6200 • FAX (360) 407-6215

February 3, 2012

Puget Sound Partnership
326 East D Street
Tacoma, Washington 98421

RE: Comments to the Proposed Revised 2020 Action Agenda

Thank you for the opportunity to comment on the Puget Sound Partnership's proposed revisions to the 2020 Action Agenda. Below you will find comments on the proposed strategic initiative and on the prioritization process under consideration. You will also find specific comment on the near term actions in which the Conservation Commission or conservation districts are implicated. But first, the PS Partnership should consider the strong role conservation districts currently play in the recovery of Puget Sound and the role they play in the region's future.

RECOGNITION FOR THE WORK OF CONSERVATION DISTRICTS

First, I would like to reinforce with you the work of the 12 Puget Sound conservation districts and the important role they play in working with farmers in the region to address impact to natural resources. Conservation districts are known for their decades of experience in completing successful on-the-ground projects to improve water quality, enhance efficient water use, manage livestock, and improve air quality. And these projects are done with the close cooperation of the landowner ensuring the long-term success of the implemented practices.

In 2009, the conservation districts produced the Puget Sound District Caucus Action Agenda. This document links the annual and long range plans of the 12 Puget Sound conservation districts with the threats identified at the local Action Areas. These local threats are compiled in the PS Partnership's current 2020 Action Agenda. By making the connection between the work of the conservation districts, the threats identified in the Action Agenda, and the actions identified in the Action Agenda, policy makers at all levels of government will know that when they provide funding for a conservation district project, they are also supporting the objectives of the 2020 Action Agenda.

The Puget Sound conservation districts are leaders in working with landowners to accomplish on-the-ground projects with natural resource improvement results. Since 2009, these conservation districts have provided technical assistance to 6951 landowners and developed 798

new landowner plans. Conservation districts are trusted sources of information for landowners throughout the Puget Sound basin.

As the Puget Sound Partnership proceeds with establishing Local Integrating Organizations (LIOs) the PSP should ensure conservation districts are included as active participants. Experience to date suggests this is not always the case. If we are to be successful in addressing natural resource impacts from agricultural activities in the Puget Sound basin, conservation districts must be a part of any local strategy. The PSP should monitor the implementation of these LIOs to ensure conservation districts are included.

SUPPORT STRATEGIC INITIATIVES, ESPECIALLY FOR AGRICULTURAL RUNOFF

The PS Partnership should establish strategic initiatives as part of the revised Action Agenda. As the proposed Action Agenda states, these initiatives would encourage more focused attention on the specific actions needed to address important pressures on Puget Sound. Given this criteria for considering initiatives, we would recommend “protection of water quality and nearshore habitat from rural and agricultural runoff” as a strategic initiative. Nonpoint sources of pollution pose a key threat to the health of Puget Sound.

With no point source or permit to provide the tool for addressing the pollution, nonpoint sources require close coordination and cooperation of the parties at the state and local level responsible for program implementation. The good news is there are several process structures already in place where this coordination can take place. The PS Partnership should identify these processes and engage with them to encourage them to show results on addressing pollution. The Partnership should also work with existing entities such as the State Conservation Commission and conservation districts take on coordination tasks as they relate to agricultural activities and conservation district programs.

PRIORITIZATION PROCESS

The proposed revisions to the Action Agenda indicate the Partnership will be prioritizing the actions in the final document. We support the notion of prioritization but there is very little information in the proposed Action Agenda materials to give an indication of what will be the prioritization process. One possibility that has been discussed is the Partnership would first prioritize near-term actions and then prioritize ongoing actions. We would strongly recommend the Partnership reverse this approach and prioritize ongoing programs first.

In revising the existing Action Agenda, the Partnership is fundamentally asking the questions: What did we say we would do? What did we do? Did it work? These questions necessarily require us to look at ongoing programs first. To do otherwise, to look at proposed new actions first, would be to essentially start over from scratch. By evaluating ongoing programs first in the context of whether these programs are or could help address threats to Puget Sound would serve

a number of important values, including honoring existing work, working within existing limited resources but adjusting to me more effective, and establishing a true adaptive management approach to revising the Action Agenda in the future.

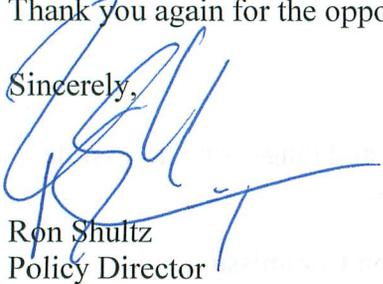
We would recommend the Partnership develop a prioritization process first evaluating ongoing actions with a set of criteria including what threat the ongoing action is intended to address, whether the action is addressing the threat, and if not what is the specific reason for the limitation and how to correct. Only then should the Partnership evaluate new near term actions.

SPECIFIC NEAR TERM ACTIONS

There are several proposed near term actions in the revised Action Agenda which impact the Conservation Commission and conservation districts. Attached you will find specific comments for each of these proposed actions.

Thank you again for the opportunity to comment on the proposed revised PS Action Agenda.

Sincerely,



Ron Shultz
Policy Director

PSP Revised Action Agenda
Strategies and Near Term Actions for WSCC and Conservation Districts
February 3, 2012

WSCC comments on the near term actions in the proposed revised Action Agenda.

Strategy A, subtask 3.1

Create and offer an expanded, integrated suite of incentives and market-based programs that make voluntary stewardship and conservation of private forest and agricultural lands practical and economically rewarding

NTA #1

By 2012, the Conservation Commission will work to enhance use of all USDA conservation and habitat restoration program funding, i.e., CREP and EQUIP, which are currently underused by and not tailored for western Washington growers.

WSCC Comment: Support

Strategy A, subtask 3.3

Develop a comprehensive strategy for retaining economically viable and long-term successful, working agricultural and forest lands through a collaborative process.

NTA #2

PSP, in collaboration with Agriculture, Ecology, and the Conservation Commission, will convene a series of workshops to engage agricultural stakeholders to identify needs for maintaining the health of the industry, and identify key areas where the agricultural industry can assist in the protection and restoration of Puget Sound

WSCC Comment: The Conservation Commission should lead this effort because the legislature established the Office of Farmland Preservation within the Commission. The composition of the Commission includes DNR, so it would make sense to also include working forest lands in the charge to the Commission.

Strategy A, subtask 5.5

Protect, enhance, and restore floodplain function on forest and agricultural lands.

NTA #1

By 2013, Conservation Districts and Watershed Groups implement three pilot projects that demonstrate ecosystem services markets associated with flood hazard prevention and agricultural lands in floodplains.

WSCC Comment: Support

Strategy A, subtask 5.5

Protect, enhance, and restore floodplain function on forest and agricultural lands.

NTA #2

The conservation districts, agricultural community, watershed planning groups, and local jurisdictions will use the outputs from the characterization work (A5.1 NTA 1) to identify potential land swaps (i.e., county land use and conservation districts) and identify candidate areas available to expand for agriculture outside of priority floodplain areas by 2012.

WSCC Comment: Support. The Commission could also be mentioned as providing support to these local efforts by providing facilitation and other resources.

Strategy A, subtask 5.5

Protect, enhance, and restore floodplain function on forest and agricultural lands.

NTA #3

PSP, DFW, NOAA, NRCS and others will work with farming communities to implement the Skagit Tidegate Fish Initiative, the Snohomish Sustainable Lands Strategy and other multi-benefit approaches that enable agricultural infrastructure improvements and/or provide regulatory certainty in exchange for restoration actions.

WSCC Comment: Support. The Conservation Commission is already involved in some of these processes. If two state agencies are identified then others should be as well. The WSCC should be listed.

Strategy A, subtask 6.4

Implement stewardship incentive programs to increase the ability of private landowners to undertake and maintain restoration projects.

NTA #1

No near-term action identified

WSCC Comment: Recommend a near term action as follows: Conservation districts with the support of the SCC will implement stewardship incentive programs in a manner to increase landowner participation in the implementation of restoration projects.

Strategy C, subtask 2.4

Control sources of pollutants

NTA #3

San Juan County Public Works will convene Community Development and Planning Department (CDPD), Department of Health and Community Services (DHCS), and the San Juan Islands Conservation District (CD) to identify and coordinate best management practices for stormwater, on-site septic systems, and animal wastes with community participation by 2013. CDPD, DHCS, CD, and the Town of Friday Harbor will publicize information by the second

quarter of 2014 at the DHCS, CDPD, and Town permit counters and associated websites, with a goal to target 100% of applicants by the end of 2014. San Juan County will provide for identified best management practices in County Code by 2014.

WSSC Comment: Support

Strategy C, subtask 3.1

Target voluntary and incentive-based programs in ways that will best contribute to Puget Sound recovery.

NTA #1

The State Conservation Commission and the departments of Agriculture , Ecology and Health should identify priority areas and resource impacts to target areas where implementation of voluntary incentive programs for rural unincorporated landowners, small-acreage landowners, working farms and nurseries can complement regulatory efforts and where they can best contribute to Puget Sound protection and recovery.

WSSC Comment: Support

Strategy C, subtask 3.1

Target voluntary and incentive-based programs in ways that will best contribute to Puget Sound recovery.

NTA #2

[Placeholder: The Department of Ecology, in collaboration with the Department of Agriculture and the Conservation Commission will identify an approach to ensure best management practices achieve water quality standards.]

WSSC Comment: Support the placeholder

Strategy C, subtask 3.1

Target voluntary and incentive-based programs in ways that will best contribute to Puget Sound recovery.

NTA #3

[Placeholder: [WHO] will report on the effectiveness of incentive programs to achieve resource objectives, with a particular focus on water quality standards. Participation will be sought from: PSP, Ecology, Agriculture, Health, the Conservation Commission, Conservation Districts, Federal agencies, and Tribes.]

WSSC Comment: Support the placeholder but recommend having the Conservation Commission lead this effort. The Commission is already evaluating the effectiveness of incentive programs to achieve salmon recovery objectives. This would be a logical extension of that work and it falls within the Commission's statutory authorities and duties.

Strategy C, subtask 3.2

Ensure compliance with regulatory programs designed to reduce, control or eliminate pollution from working farms.

NTA #1

Ecology will issue an updated CAFO permit in 2012.

WSSC Comment: Support

Strategy C, subtask 9.1

Improve water quality to prevent downgrade and achieve upgrades of important current tribal, commercial and recreational shellfish harvesting areas.

NTA #1

Replicate model programs, such as those in Henderson Inlet and Oakland Bay, that create coordinated, locally-driven efforts to protect and improve shellfish harvest areas. Create a best practices library or menu highlighting successful strategies so that jurisdictions do not have to reinvent the wheel.

WSSC Comment: Support. Recommend designating the Conservation Commission and the PS Partnership to work together on this NTA.

Strategy C, subtask 9.1

Improve water quality to prevent downgrade and achieve upgrades of important current tribal, commercial and recreational shellfish harvesting areas.

NTA #2

[Who?] will convene a forum of stakeholders and regulatory agencies involved in the restoration of water quality in shellfish growing areas to: § Assess how state and federal agencies can enhance local governments' efforts to respond to threatened and downgraded shellfish areas. § Develop an agreement between state agencies regarding roles and responsibilities. § Identify methods and tools that help identify and correct nonpoint pollution problems. § Provide incentives for local governments for the long-term protection of shellfish growing areas.

WSSC Comment: Support. Recommend the Conservation Commission be identified to facilitate this effort with other agencies.

Strategy C, subtask 11.5

Develop and implement a monitoring and evaluation program.

NTA #1

PSP will work with Ecology, DNR, DOH, other key implementation agencies, and stakeholders for the Action Agenda to develop a program for monitoring the effectiveness of activities to

reduce water pollution to Puget Sound and monitoring progress towards ecosystem recovery targets for water quality. (This will be done through the activities described in the cross-cutting strategy D, Implement a Coordinated, Integrated Ecosystem Monitoring Program.) .

WSCC Comment: Support. Recommend adding the Conservation Commission working with conservation districts.

Strategy D, subtask 2.1

Advance the coordination of local recovery actions via local integrating organizations

NTA #1

None

WSCC Comment: Concerns. Experience with similar local coordinating groups suggests caution with the use of LIOs. It's important that all key entities are involved at the local level and this is not always the case. There should be some level of oversight by a state entity to ensure broad local participation and an avenue for local entities that may be excluded from the process to voice their concerns.

Strategy D, subtask 3.2

Work collaboratively to report on recovery progress

NTA #1

PSP leads the building of a community of performance practice that is inclusive of local jurisdictions, tribal governments and private organizations involved in the work of restoring the Sound. The goal is to assemble and share data and experiences on sound recovery strategies techniques and outcomes

WSCC Comment: Support