

Puget Sound Partnership

Summaries of public comments:

Second phase of delineating boundaries for the Action Areas

Comments on Draft Staff Proposal, August 10, 2007

The following are summaries of the comments the Partnership received by August 27, 2007, on the draft staff recommendations for delineating Action Area boundaries in the Puget Sound basin. During this phase of the public comment process the public could review and respond to the draft proposal developed by Partnership staff, including options that were developed for selected areas. Staff based the proposal partly on the comments received during the first phase of the process.

The summaries highlight key points in the letters and are organized as follows. Full PDF copies of the comment letters are available at the Partnership's website at www.psp.wa.gov/about_us/action_areas.htm.

- [Comments from City Governments](#)
- [Comments from Conservation Districts](#)
- [Comments from County Governments](#)
- [Comments from Individual Citizens](#)
- [Comments from Non-governmental Organizations](#)
- [Comments from Regional Collaborations](#)
- [Comments from State Agency Staff](#)
- [Comments from Tribal Governments](#)
- [Comments from Watershed Groups](#)

City Governments

Darlene Kordonowy
City of Bainbridge Island

The City of Bainbridge Island will continue to look to the West Sound Watershed Council as the organizational mechanism to coordinate local natural resource management issues and to represent us at the regional level. Strongly support option 2 for the Central Puget Sound delineating a West Central and East Central action area. This configuration best reflects the ecological, organizational, and representational differences in Central Puget Sound. We do not support the option delineating North Central and South Central action areas. If the Council follows the recommendation for a single Central Puget Sound action area, one representative should come from WRIA 15 and one from WRIs 8, 9, 10 and 12.

Conservation Districts

George Boggs
Whatcom CD

Concur with the delineations, with one reservation. Does the Partnership have the legal authority to adopt six areas and use two new names? How would the legislature respond? If there are no dire consequences, then proceed with the recommendations. If there are concerns, then suggest staying with the original names and parse the Central Puget Sound into two areas as per the second option, but name the Kitsap side 'North Central Puget Sound' and King side 'South Central Puget Sound'.

Al Latham
Jefferson CD

Support the recommendation to define the Hood Canal Action Area to include the waters and associated watersheds to the Jefferson-Clallam county boundary. This definition will support the substantial existing and ongoing protection and restoration efforts, strategies and organizations. This proposal will allow the Puget Sound Partnership to build on existing structures without the gross inefficiencies of starting all over again and reinventing

the wheel. Other configurations may make sense to some but not to those who have to actually implement the goals, objectives and projects that will make the Puget Sound Partnership a success.

County Governments

Sharon Dillon, Don Munks, Kenneth Dahlstedt
Skagit County Board of Commissioners

Skagit County supports including WRIA 3 in the Whidbey Basin and requests, for administrative purposes, that the Whidbey Basin Action Area be divided into two sub-areas with the Skagit-Stillaguamish watershed boundary being the dividing line. This would allow the jurisdictions to work more efficiently in gathering information and implementing future programs. The Whidbey Basin is too large for the individual jurisdictions to coordinate effectively. Dividing the area will allow jurisdictions to participate more effectively and achieve a more satisfactory result.

Debora Hyde
Pierce County

We believe there should be seven sub-basins as directed by the legislation [based mainly on the delineations in the PSNERP map]. If it needs to be changed, then do so using the appropriate legislative process. The number and location of the sub-basins received significant testimony during the legislative process. The South Sound and Central Sound areas in the proposal appear to be the same as those identified in the PSNERP submittal and we believe they should remain as presented. We do not recommend dividing the Sound by a north-south or east-west line. Work can be broken into smaller sub-sets and the underlying ecosystem functions can't be ignored. Would like to see the northern areas organized more according to ecosystem functions than jurisdictional lines, and reiterate the need to provide local jurisdictions with support to address this Puget Sound initiative.

Aaron Reardon
Snohomish County

I support the recommended boundaries for the Whidbey Basin and the Central Puget Sound as action areas that encompass the watersheds within Snohomish County. These boundaries are difficult to delineate with many overlapping scientific and social considerations. In light of these considerations, I urge the Partnership to create two representatives for the Whidbey Basin Action Area rather than one. The Whidbey Basin is by far the largest action area and holds a high diversity of interests and issues that would make collaboration challenging in creating and implementing the Action Agenda. To effectively represent the area and to increase the likelihood of successful implementation, two representatives are needed to work together to coordinate the input necessary to make the Action Agenda workable and effective.

Jeff Tate
Island County Planning and Community Development

It seems that the action areas are intended to improve coordination to improve the health of Puget Sound. It's unclear how this will manifest itself in the form of action areas, and creates a challenge understanding the financial and staffing demands. We are concerned about Island County's representation in the large Whidbey Basin action area. By combining island and mainland communities/watersheds in the same action area, our efforts and messages may be minimized. WRIA 6 (Island County) provides habitat for Puget Sound salmon populations, not just salmon in the Skagit, Stillaguamish, Snohomish basins. We request that the Council maintain the Whidbey basin as a single action area that is consistent with the WRIA 6 boundary.

Josh Brown
Kitsap County Board of Commissioners

Kitsap County supports the staff recommendations for the Hood Canal and South Sound action area delineations. With respect to Central Puget Sound, Kitsap County supports a delineation that separates the West Central and East Central Action Areas (option 2) because it recognizes the existing collaborative planning processes in the respective areas as well as the distinct character of the drainages and shorelines in the two areas. If combined as a single action area, we strongly recommend assigning two Ecosystem Coordination Board representatives to the area, one representing the west side (WRIA 15) and one representing the east side (WRIs 8, 9, 10, 12).

Michelle McConnell
Jefferson County Department of Community Development

I concur with the staff-recommended proposal for the Hood Canal Action Area, option 1, which keeps the boundary at the Jefferson-Clallam county line. Splitting longstanding and successful jurisdictional areas, agreements and working relationships as presented in options 2 and 3 could be problematic to decision-making and implementation processes. I now believe that using physical/biological attributes as a second tier for subdividing action areas may be unnecessary because key efforts already require policy and action based on sound science. As we move forward we will be interested in better understanding how the action areas will function and be used and what obligations jurisdictions will have for implementing the Action Agenda.

Ron Sims
King County

I support the staff recommended option delineating the central Puget Sound action area. This comports with the principles offered in my initial letter. I want to reiterate that the primary purpose of the sub-regions is to meet the administrative need to roll up actions and contribute to the outcomes of the 2020 Action Agenda. This should not become a new level of organizational structure for the Puget Sound Partnership. If the action area is subdivided there is a need to provide a clearer description of the boundaries, and it is critical that Vashon Island not be separated from King County or WRIA 9. The sheer size of the Whidbey Basin action area causes concern about getting the work done. The Council needs to make sure that each area has the support necessary to advance the development of the Action Agenda.

Individual Citizens

Robert Kenny and Julia Grover

Support the proposed action areas as delineated. The Whidbey Basin demarcations are logical since they recognize the ecological and hydrological wholeness and integrity of the basin.

Gabe and Robin Ornelas

We request that you consider Discovery Bay as an Action Area because it is an important flyway, restoration of Salmon Creek, vibrant marine environment, shellfish production, and other reasons.

Non-Governmental Organizations

Elizabeth Barlow
Shockey Brent, Inc.
Support the staff recommendations.

Amy Trainer
Friends of the San Juans

We encourage the Partnership to follow the boundaries as delineated in RCW 90.71 and let the San Juan Islands stand as a distinct Action Area for several reasons. The San Juan Archipelago is a unique environment distinct from the mainland shorelines and associated river systems. Existing working relationships, governance structure and planning processes (e.g. the county's marine stewardship area plan, WRIA 2 watershed planning, SRFB funds) support the need for a separate action area. And combining the islands and mainland would pose a logistical hardship to Islanders wishing to participate in the Partnership process.

James Lynch
Puget Sound ESA Business Coalition

We believe that it is appropriate for the Partnership to engage in a notice and comment process to establish action areas pursuant to the authorizing legislation. Specifically we recommend that the Partnership issue a proposed policy: (1) establishing action areas, (2) describing how such action areas comport with statutory and regulatory requirements, and (3) soliciting public comments on a specific proposal. This process should occur prior to establishing the action area boundaries to ensure that any final designations are based upon the best available information. The delineations should be consistent with the statute, based on common issues and characteristics, and avoid overlap or duplicative processes.

Joleen Palmer

Stillwaters Environmental Center

We do not think it is a good idea to include the East Kitsap area in one general Central Puget Sound action area. The issues of restoration and development are significantly different, and the growth and transportation issues that East Kitsap has in common with the rest of Puget Sound can be addressed through some current regional coordinating body. The projects in the East Kitsap strategy are of a very different scale compared to projects in other parts of this action area. If East Kitsap ends up in the Central Puget Sound area, then I would like the Partnership to consider having one representative from East Kitsap to be appointed to the Ecosystem Coordination Board.

Sara Hemphill

Sustainable Solutions

Concur with the procedural recommendation of the Puget Sound Endangered Species Act Business Coalition that the Partnership issues a proposed policy: (1) establishing action areas, (2) describing how such action areas comport with statutory and regulatory requirements, and (3) soliciting public comments on a specific proposal. This process should occur prior to establishing the action area boundaries to ensure that any final designations are based upon the best available information. The delineations should be consistent with the statute, based on common issues and characteristics, and avoid overlap or duplicative processes.

Regional Collaborations

Nancy Dilworth, Citizens for a Healthy Bay

Bill Baarsma, City of Tacoma

Timothy Farrell, Port of Tacoma

The Partnership's proposal to combine the North Central and South Central Puget Sound is contradictory to the statute directing delineation of seven action areas. We conclude that this approach cannot be readily implemented and the initial decision should be based on the seven areas. We recommend that the Partnership's delineation between the South Central and North Central action areas reflect the boundary of the *Marine Fishery Management Area and Associated Uplands*. This recommendation reflects such factors as physical oceanography, common issues and interests, human 'sense of place', distinct issues and remedies, where and how upland waters enter into Puget Sound, and long-standing partnerships.

Curtis Tanner

Puget Sound Nearshore Partnership

It's important to develop an understanding of ecosystem problems and priorities for action along ecosystem boundaries. The Puget Sound Nearshore Partnership relied on our nearshore science team to provide us with delineations that correspond generally with 'breaks' in ecosystem processes. We also felt it important to remain consistent with the sub-basins listed in the Partnership legislation. The Nearshore Partnership and PSAMP, two science-based groups, came to similar conclusions in addressing this challenge. We recommend using the sub-basin delineations developed and used by our program. This approach seems consistent with the mandate for state agencies to begin adopting an ecosystem based management approach. For these reasons, we recommend setting the Hood Canal/Strait of Juan de Fuca boundary at Pt. Wilson (option #2); setting the Georgia Straits/Whidbey Basin boundary at the southern most boundary (option #2); and in the Central Basin, if you choose to remain consistent with the legislation, extend a line from Point No Point to near Possession Point.

State Agency Staff

Douglas Palenshus

Department of Ecology

The name "Action Areas indicates human action as the end result, and we know that the behaviors of watershed residents, along with those of their governmental elected and appointed officials, are key to making positive changes in human-impacted ecosystems. I submit the idea that residents of various Puget Sound islands have much more in common with one another, regarding long-term impacts to nearby waters, than residents of mainlands. This is especially true when we consider the connection between water supply/water resources, water

quality, how planning can affect them, and government actions to inform behaviors in island ecosystems. I urge that these commonalities be used, at a minimum, as a tie-breaking consideration when other organizational concepts come into conflict.

Dave Nysewander

Washington Department of Fish and Wildlife

I've been involved in formulating feedback from the PSAMP and PSNERP recommendations. My comments are based on 34 years experiences as a marine wildlife biologist and do not necessarily reflect the agency's views. I like the effort to incorporate watershed and political concerns. However, I draw the line where these considerations result in an irrational division of the marine ecosystem. Examples are the division of the eastern Strait of Juan de Fuca, the division of Admiralty Inlet, inclusion of the eastern Strait in the Hood Canal subregion, inclusion of some islands in the Whidbey Basin, and the artificial line at the south end of Whidbey Island at the Possession Point Banks. There also appears to be inconsistency in applying the guiding principles. For example, it's no more appropriate to divide Admiralty Inlet down the middle than to divide Hood Canal down the middle. I recommend more carefully preserving the marine basins captured by maps 2, 6, or the PSNERP version with only minor tweaking for political issues (e.g., the division of Port Townsend).

Wayne Paulsson

Washington Department of Fish and Wildlife

I second the comments by Dave Nysewander of WDFW. When working with marine resources, dividing Puget Sound down the middle or into fractionated zones does not make scientific sense. Fish communities have affinities to sub-basins in Puget Sound as divided by sills, especially between North and South Sound as divided by the northern sill at Admiralty Inlet which has led to significant genetic diversification in marine fish. The proposed designations have a strong basis for efficient political management, but I'm unsure if we can give credible results regarding trends, status, and other technical information when the boundaries are not reflective of the organisms or animal communities.

Tribal Governments

Ron Allen

Jamestown S'Klallam Tribe

We disagree with your staff recommendation for the Hood Canal - Straits boundary. For the three areas where there are alternative boundaries, the staff-recommended approach seems to rely on 'working relationships'. We find this reasoning to be flawed. We agree that entities in Hood Canal and the Straits must work together no matter what lines are determined. However, 'working relationships' is not adequate reasoning for establishing the boundaries. This is particularly true for the Straits where the boundaries are clear -- from Cape Flattery to the entrance to Admiralty Inlet. The staff recommendation is not based on science but apparently on the views of some planning groups arguing for the convenience of maintaining certain salmon habitat restoration boundaries. Such planning areas are artificial and should not be the determining factor in establishing action areas for recovering Puget Sound. We find that our original recommendation, to set the line at Point Wilson, is the only option that addresses all of the Partnership's criteria and principles.

Denese LaClair

Skokomish Indian Tribe

The Skokomish Tribe supports the recommendation of the Partnership staff in setting the action area boundary for the Hood Canal Action Area at the Clallam/Jefferson county line. This is the geographic area in which the Skokomish Tribe, Port-Gamble S'Klallam tribe, and the commissioners of Jefferson, Kitsap and Mason counties have been working collaboratively since 1985 through the Hood Canal Coordinating Council. HCCC is the lead entity for Hood Canal and Strait of Juan de Fuca summer chum salmon recovery in this geographic area. Maintaining these intergovernmental working relationships is identified as a priority in the statute that created the Puget Sound Partnership.

Paul McCollum

Port Gamble S'Klallam Tribe

Our department supports option #2 for the boundary between Hood Canal and the Strait of Juan de Fuca which sets the action area boundary at Point Wilson based on the ecosystem delineations proposed by the Puget Sound Assessment and Monitoring Program and the Puget Sound Nearshore Partnership.

Watershed Groups

Jean White
King County

Of the three options proposed for Central Puget Sound, the WRIA 8 Salmon Recovery Council Chair, Dr. Don Davidson, and Vice Chair, King Co. Councilmember Larry Phillips, feel that the staff recommended option #1 is the best from WRIA 8's perspective. We appreciate the compromise suggesting two representatives for this area given its size and population. Given the timeline for this review and WRIA 8's meeting schedule, the full WRIA 8 Council was unable to fully discuss the boundaries. You may receive comments from other jurisdictions in our watershed.

Bill Paulsen
Snoqualmie Watershed Forum

We feel that the Whidbey basin covers too large of an area and encompasses too many groups, watersheds and interests to allow for effective local participation. We therefore back the Snohomish Forum's recommendation that the Whidbey Basin be divided into two sub-regions [action areas] consisting of (a) the Snohomish, Stillaguamish, and Island County watersheds, and (b) the Skagit watershed. If maintained as a single action area, we request that the area have two representatives on the Ecosystem Coordination Board representing the two sub-regions.

Terry Williams
Snohomish Basin Salmon Recovery Forum

The Skagit, Stillaguamish and Snohomish river basins and Island County cover more than a third of the region's land mass, the two largest river systems and a huge diversity of interests. Delineating such an action area does not meet our primary interest of more, rather than less, local involvement. Therefore we cannot support the proposed action area boundary. We suggest dividing the Whidbey Basin into two action areas consisting of (a) the Snohomish, Stillaguamish, and Island County watersheds, and (b) the Skagit watershed. We also suggest providing two action area representatives for the Whidbey Basin.

Tom Ammeter
North Olympic Salmon Coalition

We support the staff recommendation to define the Hood Canal Action Area to include the waters and watersheds extending to the Clallam-Jefferson County line. This definition will support the substantial existing and ongoing protection and restoration efforts, strategies and organizations. The complexities of the Puget Sound Ecosystem make delineation as complicated as defining the boundary of the solar system. There is no hard and fast boundary in a system driven by constantly changing confluences of air, water and earth. Using the Jefferson-Clallam county line will allow the Partnership to build on existing structures without the gross inefficiencies inherent in changing the human organizational framework. Communities have already self organized in a manner that promotes large-scale improvement to Puget Sound through the lead entity process, marine resource committees, WSU Cooperative Extension programs, and watershed planning.