PugetSoundPartnership

our sound, our community, our chance

Draft Action Agenda Comments

Citizens

Nov. 6 - 20, 2008

Set 2 of 8

From: David Abbot

Comment: Dear Puget Sound Partnership,

I am writing to urge you to improve your action agenda's recommendations on pollution prevention.

It's not just a matter of protecting some species that most of us will never see or relate with and that many people don't care about. It is a matter of protecting OUR living environment; even people who don't care about other species still must admit that those creatures' general state of health is a very accurate determinant of what OUR health will be like if we keep polluting and refusing to clean up after ourselves.

People who insist on pretending that we exist independent of our environment should try not breathing, not drinking water, and not eating food: our air, water, and food ARE our environment, and when other species can't safely breathe, drink (or live in) water, or eat, it is only a matter of time before WE can't safely breath, drink water, or eat food.

So, as much as you might hear about treehuggers and all that, this is not an issue of left versus right; it isn't a political issue at all. It is a question of survival. Do you want your children and grandchildren to have air that is safe to breathe, water that is safe to drink, and food that is safe to eat? Don't give me your answer, look into your children's eyes and tell them whether you can enough about them to clean up their environment.

From: David Abbot

Comment: Dear Puget Sound Partnership,

Thank you for your hard work to develop a draft Action Agenda to restore, protect and recover Puget Sound to health by 2020.

In economics and business classes, our universities and colleges teach that there is no direct relationship between business and the environment. That is an interesting viewpoint, considering the fact that our planet is now so polluted as a direct result of business activities, that countless plant and animal species are extinct. Who cares? Well, the problem is, if we keep going in this same direction, WE will become extinct. And that would sure put a crimp in our bottom line...

So, perhaps the only relevant question for the trickle-down crowd is, "How long can I get away with business as usual, before MY business interests are harmed by my business activities?"

And the answer is, no one can put an absolutely certain date on it. So, we have to guess. And guess what? Guess wrong, and we- and our businesses- are history.

So, what are you going to do?

From: Janice Absher

Comment: Dear Puget Sound Partnership,

We must act now and effectively to save the Sound!!

The Partnership staff, the Leadership Council, Ecosystem Coordinating Board, Science Panel and stakeholders throughout the Sound deserve praise for the monumental effort involved in producing the draft Action Agenda. The next step is to finalize a plan that is accountable, transparent, effective and have dedicated new funding sources to the recovery of Puget Sound by 2020.

The Partnership must create a real 2020 Action Agenda, not just a 2-year plan that clearly identifies the specific actions that are needed over the next 12 years and the HOW and WHO and BY WHEN each action must be completed. All the actions need to be tied together into a comprehensive whole through measurable benchmarks that must be accomplished in order to achieve recovery by 2020.

Thank you for this opportunity to strengthen a strategy to save Puget Sound.

From: Julie Acevedo

Comment: Dear Puget Sound Partnership,

I am writing to urge you to improve your action agenda's recommendations on pollution prevention. I want a healthy Puget Sound to be part of the legacy we leave our children.

Many Washington manufacturers continue to use harmful chemicals without any plans to switch to chemicals that are safer for Puget Sound. To protect public health and the environment, Washington's industry must begin phasing out of the worst toxic chemicals and developing plans to switch to safer alternatives.

Please include recommendations to help move Washington's businesses toward safer alternatives and away from chemicals known to be harmful to Puget Sound. These proposals should include

-Increasing the availability of technical assistance to help businesses reduce chemical use.

-Developing a state program to focus on researching safer chemicals and materials.

-Requiring better industry reporting to Ecology of the chemicals currently being used.

From: Bob Aegerter

Comment: Dear Puget Sound Partnership,

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Headwaters and Roadless Areas

The draft agenda often cites the need to protect intact ecosystems / processes (introduction, page 3, question #2; page 4, question #3; and page 1), but I believe it needs to go much farther in stressing the need for permanent protection of the headwaters that reach Puget Sound. Only a passing reference as a bullet point is seen on page 5 of question 3, and other references to "watershed scale study.?

The agenda should explicitly and repeatedly call for protecting the last remaining roadless areas (federal and state land) in the form of wilderness protection, wild and scenic protections, similar state level protections or combinations of all of these.

Intact Habitat

The study accurately notes that protecting intact habitat is the most cost-effective means of accomplishing the goal of restoring Puget Sound. However, it does not clearly define what "intact habitat" is. It also fails to point out we can get the most for our local, state, and federal tax dollars by designating roadless areas under the highest forms of protection (wilderness).

Logging Roads

Furthermore, there should be an explicit call for removal of old, sediment-bleeding logging roads throughout the highly productive, low elevation forests across the region. This addresses both habitat and water quality. The Agenda should call for converting some of the areas formerly logged (especially steep slopes, and at headwaters/riparian/watershed areas) to wilderness highest forms of protection as well, as many of these areas are suitable and necessary for such high-level protection.

Pollution

The Agenda also stresses going after pollution at its source. One of the sources of our dirty Puget Sound is from erosion that begins upstream. The enormous amount of silt and pollutants that find their way from the Cascade Crest into our Sound can be stopped or greatly reduced if we develop an Action Agenda that gives much more weight to the ecosystem - ecosystems that support animal life (including human, but also include many forms of non-human life), birds, plants, healthy soils, fungi, reptiles, amphibians, and enormous amounts of aquatic species. Support for sound, science-based policy for the optimal conservation and management of newly arrived gray wolves in our state is one example of how far-reaching our protection of wilderness reaches. As we support natural predators such as wolves and grizzles, we will find healthier forests, streams, rivers, and

ultimately, a healthier Puget Sound.

Environmental Health

The Action Agenda needs to recognize that environmental health of Puget Sound is a broad indicator of the cumulative effect of all the individual, community, industrial and commercial actions that we take in the rural, forested and urban areas around Puget Sound and on its waters. We must do everything well or we will continue to see declines in the environmental health indicators for the Sound.

Thank you for this opportunity to strengthen a strategy to save Puget Sound.

From: Vance Aeschleman

Comment: I submitted a recommendation 11/10/08 suggesting formation of a volunteer group to assist in implementation of the Action Agenda. I would like to suggest an alternate name for this volunteer group - Watershed Stewards.

From: Vance Aeschleman

Comment: Scanned the draft action agenda and wanted to submit suggestions to refine action items already in the agenda:

1. Create volunteer Watershed Watcher org (modeled along Master Gardener Program)supported by existing organizations (perhaps WSU Ext or maybe a public org such as the Water Masters mentioned in the Agenda). Suggested mission of the group would include:

a. Help implement the Action Agenda by educating local public, recruiting additional volunteers, conducting workshops, and helping distribute appropriate protection or best practice information through their watershed.

b. Identify/report and help eliminate pollution sources within their watershed.

2. Require companies operating vehicles or equipment with hydraulic power systems to conduct pressurized inspections and to correct any hydraulic fluid leaks of the equipment immediately prior to operation on public roads.

3. Develop best practice information to encourage reduction or elimination of release of environmentally hazardous chemicals from un-used, non-operational, or part-source vehicles or equipment on private or publically owned land.

4. Encouraging development and use of absorbant vehicle mats which would help homeowners identify a polluting vehicle and need for corrective maintenance. The mat should change color upon contact with petroleum/carbon products. Consider a requirement to place mat(s) under vehicles not operated for 30 or more days.

5. Promulgate a toll free number for reporting spills. I know these numbers already exist but

the public does not have knowledge of the line or when/what spill information should be reported.

6. Develop/advertise a You Can Help or Your Carbon Footprint brochure for the general public. This brochure would focus on appropriate calls for public behaviour or activities to further the Action Agenda. I am already receiving information from the partnership.

From: Shelley Alan

Comment: Dear Puget Sound Partnership,

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Thank you for this opportunity to strengthen a strategy to save Puget Sound.

From: Dan Alexander

Comment: The Draft 2020 Action Agenda of 11/06/08 presents a shaky foundation for curbing human activities with respect to shoreline improvements. For example, note the conditional phrasing at page 15: "The act of putting in a dock or building a bulkhead could very well make it more difficult for our starving resident orca to find food." This amounts to emotional advocacy, lacking reason and hard-fact justification. It should be deleted.

From: Glen Alexander

Comment: Number one: we should stop calling it Puget Sound. We will never clean up Puget Sound if we don't include the rest of the Salish Sea and those who live in the watershed of the rest of the Salish Sea.

P. 6, in section "Fix Up" it says, "Visit www.psp.wa.gov to connect with a group in your area." This is a great idea but I found nothing at that web site to help me connect to groups in my area.

P. 8, QUESTION 1, "What is a healthy Puget Sound (and how do we know if we are moving toward one)?" The first page of this section is too weak, too general. In fact the question is not answered at all on this first page. It should start out more clearly and more precisely

stating the answer or explaining that the answer is found on subsequent pages. I didn't understand that until I got to page 12.

P. 10. I like the provisional indicators and recognition of the need to develop final indicators. Targets and Benchmarks (similar to those listed on p. 10) need to be developed for all the Priorities and Actions outlined on PP. 23 through 68.

I'm worried that Priority A (P. 23 "Protect Intact Ecosystem Processes, Structures, and Functions") is in conflict with Priority D (P. 45, "ensure that activities and funding are focused on the most urgent and important problems facing the region.). I fear that intact systems will compete with deteriorated systems for funds and attention. It's not clear to me how we will resolve this conflict.

The Priorities and Actions are great. There is a tremendous amount of work for us all to do. It will require a tremendous expenditure of money and political will. We will never succeed with the current level of understanding and commitment in our citizens and economic communities.

The role of education will need to be strengthened. Here are my ideas for strengthening the role of education: Many managers do not understand the differences between training, education, outreach and marketing. These terms need to be defined and differentiated in this document. Each has a different role and outcome. This needs to be made clear to decision-makers using this Action Agenda as a guide. One place where this is evident is in the Implementation Table beginning on P. 79. The word "education" appears only three times in this table. Two of these are actually outreach and one is education. None of the actions in the Implementation Table will succeed without more educational efforts to support them. The words education, training, outreach and marketing should be within each Priority in the Implementation Table. Only two of the Action Areas include the word "education" in their Draft Action Area Priorities tables on pp. 70 through 77. Every Action Area will need to include multiple educational efforts targeting specific audiences for specific outcomes. The roles of education, training, outreach and marketing need to be more explicit for achieving the goals throughout the priority descriptions beginning on p. 23 through p. 55, not just in Priority E (p. 56 -68). An example of the weak tone of the commitment to education is found in the last sentence on p. 90. "The Partnership will work to identify all of this type of funding and develop technical assistance, education, and incentive programs to help focus the associated work in ways that are beneficial to the Sound." How about, "The Partnership will identify all of this type of funding and develop effective technical assistance, education, and incentive programs to help focus the associated work in ways that are beneficial to the Sound." This sentence should be followed up with an explanation of how this will be done. It needs targets, benchmarks and an explanation of how we will know if our efforts are effective. If these things are included elsewhere in the Action Agenda, they should be referenced here.

I'm not familiar with the "Education Working Group" briefly mentioned briefly on p. 67. More detail needs to be provided here. The ECO Network (and/or the Education Working Group, depending on what that is) should have a representative on the Leadership Council, Ecosystem Coordination Board, and Science Panel.

The fourth bullet under Priority E on p. 56 currently reads, "Sustained, coordinated efforts for

communication, outreach, and education to increase public awareness and encourage individual stewardship." These tools need to be recognized for their roles that go much beyond that. They will also increase public participation in decision-making processes. They will also take us beyond individual behaviors to group actions such as those outlined in the list of partners on p. 93. When I read that comprehensive list I see many collective actions that will not happen without targeted educational activity.

From: Sharon Allbright

Comment: Dear Puget Sound Partnership,

Thank you for your hard work to develop a draft Action Agenda to restore, protect and recover Puget Sound to health by 2020. It could not come at a more pressing time, I am looking forward to a more detailed plan that also includes what the average person can do besides donate money.

For Puget Sound!

From: Eric Allen

Comment: Dear Puget Sound Partnership,

Thank you for your hard work to develop a draft Action Agenda to restore, protect and recover Puget Sound to health by 2020. It could not come at a more pressing time, especially for the Sound's iconic and endangered orca whale. Just this month, researchers reported seven orcas "10% of the Puget Sound population" are missing and believed to be dead. Some experts say dwindling populations of endangered Chinook salmon are at least partly to blame. Is this a sign that our ecosystem is on the verge of collapsing?

The urgency of restoring the Sound to health is at a tipping point and missing orcas are the Sound's "canaries in the coal mine," telling us we are running out of time. But there is hope for the orca, as there was hope for the bald eagle, the California Condor and others on the verge of extinction. The Puget Sound Partnership's Action Agenda is a golden opportunity to do what has not been done for over 20 years- develop and implement a recovery plan that is accountable, effective, transparent and decisive with sustained funding to restore this national treasure to health by 2020.

The draft Action Agenda includes many of the essential elements that need to be done:

-Require low-impact development to reduce stormwater pollution;

-Prohibit new bulkheads near feeder bluffs and forage fish spawning beaches;

-Fund local governments to develop and carry out shoreline master programs;

-Fund enforcement staff at state agencies and local governments;

-Implement specific, aggressive cleanup plans for polluted waters, including TMDLs;

-Fully fund a permanent year-round rescue tug at Neah Bay for oil spill prevention;

-Acquire critical intact parcels for habitat protection and conservation;

-Set strong requirements for water quantity, such as setting in-stream flow for all major rivers.

BUT, more than a list of Soundwide and Action Area-specific actions, the Partnership must create a real 2020 Action Agenda, not just a 2-year plan, that clearly identifies the specific actions that are needed over the next 12 years and the HOW and WHO and BY WHEN each action must be completed. All the actions need to be tied together into a comprehensive plan with measurable benchmarks and timelines in order to achieve recovery by 2020. The final Action Agenda must:

-Clearly identify timelines and responsibilities;

-Identify adequate and sustained funding for the long haul;

-Be a visionary and long term plan;

-Be based on science;

-Offer a comprehensive and robust program to prevent all sources of stormwater pollution, not just municipal stormwater;

-Strengthen the list of actions for toxic pollution prevention;

-Set meaningful standards for habitat protection;

-Balance regulatory change with land acquisition to accomplish long term recovery goals;

-Expand the indicator species to include more than just salmon, i.e. forage fish, harbor seals, etc.

The Partnership staff, the Leadership Council, Ecosystem Coordinating Board, Science Panel and stakeholders throughout the Sound deserve praise for the monumental effort involved in producing the draft Action Agenda. The next step is secure much needed funding. The 2009 legislature must adopt new funding sources dedicated to the recovery of Puget Sound by 2020.

For Puget Sound!

From: Kathleen Allen

Comment: Dear Puget Sound Partnership,

I am writing to urge you to improve your action agenda's recommendations on pollution prevention.

I am concerned about the health of Puget Sound Salmon and Orca whales. I am also concerned about our children's environmental security.

Please protect our world. Stop pollution. Require more testing before products are approved for use. Develop a "better safe, than sorry" policy.

From: Lynn Allen

Comment: Dear Puget Sound Partnership,

Thank you for your hard work to develop a draft Action Agenda to restore, protect and recover Puget Sound to health by 2020. It could not come at a more pressing time, especially for the Sound's iconic and endangered orca whale.

The urgency of restoring the Sound to health is at a tipping point.

I have been reading and writing about the importance of Stormwater management on the health of the Sound and am particularly concerned that we establish a firm program to disallow polluted water to run freely into our waterways.

We need guidelines for every entity where water can reach the Sound.

I also think there is a huge opportunity to create programs that encourage local community participation in cleaning up the Sound and cleaning up the streams and lakes that flow into the Sound. It could be something that we all take an active part in and all "sacrifice" to make work.

Thanks for all you've done already.

From: Paul J Allen

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Please elevate the Deschutes Estuary restoration to an upper tier restoration project. This feasibility study is complete with all studies, including the wildlife habitat study, Deschutes/Budd Inlet/Capitol Lake TMDL demonstrate the major benefit to South Puget

Sound in general and Budd Inlet in particular with Deschutes Estuary restoration.

Thank you for this opportunity to strengthen a strategy to save Puget Sound.

From: Paul J Allen

Comment: Dear Puget Sound Partnership,

I am writing to urge you to improve your action agenda's recommendations on pollution prevention.

From: Kerri Altom

Comment: Dear Puget Sound Partnership,

As a lifelong resident of Washington State, I consider our natural heritage absolutely invaluable.

I understand that budgets are tight now, and it is difficult to justify the additional expense many environmental measures require, however:

1. Environmental protections do not have to be a financial burden; in fact,

2. A thoughtful long term cost-benefit analysis will often reveal enormous financial savings to wise stewardship.

Therefore, I urge you to improve your action agenda's recommendations on pollution prevention in Puget Sound.

From: Alex Amonette

Comment: Dear Puget Sound Partnership,

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PugetSoundPartnership
our sound, our community, our choice

Puget Sound by 2020.

For Puget Sound!

From: Melissa Amrhein

Comment: Dear Puget Sound Partnership,

I am writing to urge you to improve your action agenda's recommendations on pollution prevention.

From: Paul Ancich

Comment: Aquisitions should not be a priority.

Changes in permitting requirements addressing land use can acheive the same goals as aquisitions without the burden of perpetual management. Land use of PSP implied aquisitions will result in wasted time and energy by stakeholders debating proper use, i.e. wildlife viewing only, fishing, hunting, etc..Monies would be better spent on restoration or infrastructure. Current economics should drive best use of limited funds.

There is a need for preservation, there is also a need to properly manage what is in conservancy at the present time and the lack of proper management needs to be addressed before new aquisitions should take place.

Planners at the local level need to be vested in the PSP ideal of continuity between local needs and the ecosystem picture as a whole.

Take the funds required for the aquisition of one property and provide education to the planning departments of King, Pierce, Thurston, Mason etc.. counties.

Require DOE and WDFW insure that local permitting follow new guidelines and limit local mitigation that cannot provide effectiveness monitoring.

From: Diane Anderson

Comment: Dear Puget Sound Partnership,

I am writing to urge you to improve your action agendas recommendations on pollution prevention.

From: Chris Andree

Comment: Dear Puget Sound Partnership,

I congradulate you on putting together a draft plan on such a huge challenge with so many interests. I encourage further hard work to finalize a plan that is transparent, and has solid funding sources to mitigate harm to the Sound.

This is truly a monumental task, but one that requires drastic action. I don't doubt that we can produce alterate ways to interact with the Sound, and help companies and products reduce their impact on the Sound. It will be difficult, but the people of the Sound will be dedicated to doing their part if meaningful and solid messaging comes out of a long term plan. I certainly don't want to be debating down the road how we should had taken action earlier.

I hope that the Partnership creates an Action Agenda with real foresight, not just a 2-year plan. As the Puget Sound Partnership says, we need specifics: "HOW and WHO and BY WHEN each action must be completed." A comprehensive master plan is what the people of the region deserve. This means, just like in many business and government activities, measurable benchmarks to achieve recovery by 2020.

If not now, when? Please don't let economic downturn news soften the necessary action too much. The economy, after all, is a subsidiary of the environment. The farther we deviate from this understanding, the more painful the hangover will be...for my generation and that of my kids.

From: Susan Andrews

Comment: I have reviewed the draft action agenda and would like to let you know that I like the plan. I'm using this opportunity to let you know my feelings about the regulation of septic tanks. The regulations need to be mandatory for all homes within the entire Puget Sound basin. We have a summer home in a small community in Grapeview (right on the Sound). You wouldn't believe what passed for septic tanks in the 60's when many of the dwellings went in there. There isn't anything that they have to be tested or upgraded unless the property sells (which many of them haven't for decades.) I believe if you have a septic tank, you should have to maintain it to a current standard and it needs to be tested regularly. This should be an expense borne by the property owner. Thanks for letting me jump up on my soap box for a moment, but this is something I feel very strongly about.

From: Shanna Angel

Comment: Dear Puget Sound Partnership,

I am writing to urge you to improve your action agendas recommendations on pollution prevention.

From: Bryony Angell

Comment: Dear Puget Sound Partnership,

I am so heartened that such a coalition as yours has been created to address the health and act on improving the critical habitats of Puget Sound. I have been listening to the progress of the partnership on public radio since its inception in 2004, and am very hopeful that an action agenda has finally been created. I understand that is is the work of many interested parties, all of them caring about the health of this magnificent Puget Sound that we all share.

Of special importance to me are the protections for the marine life that exists, and in some cases, are barely holding on, within these waters. I care deeply about the health of our salmon runs,for instance, and all the life that those fish support as a consequence of their success. We learned recently that there may be as many as seven deaths among our local Orca population this year, a heart breaking possibility. Orca depend on the success of salmon runs as their food source, and are vulnerable to disease and toxic poisoning if they are malnourished.

As a little girl I watched salmon run up Lyons Creek, a watershed off of Lake Washington. That was 30 years ago, and salmon have not run up this creek for at least 2 decades. The reasons are various, but not insurmountable. IN the case of Lyons creek, it was a result of run-off from roads, and erosion at the creek's mouth, which prevented salmon from even entering the creek from the Lake. But by then even fewer salmon were returning, for reasons more complex throughout the whole region.

What I present is an anecdote and a specific concern. Puget Sound's health is a complex issue, and one that deserves thoughtful, active, and purposeful cooperative effort for effective success by 2020. I am willing to do my part as a resident of Seattle, by volunteering for clean ups, strengthening awareness in our schools, changing lifestyle habits, you name it, in order to save Puget Sound. You have a willing foot soldier in the challenge ahead.

The Partnership staff, the Leadership Council, Ecosystem Coordinating Board, Science Panel and stakeholders throughout the Sound deserve praise for the monumental effort involved in producing the draft Action Agenda. The next step is to finalize a plan that is accountable, transparent, effective and have dedicated new funding sources to the recovery of Puget Sound by 2020.

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Thank you for this opportunity to strengthen a strategy to save Puget Sound.

From: Anne Foster Angelou

Comment: Dear Puget Sound Partnership,

I am writing to urge you to improve your action agenda's recommendations on pollution prevention. The ocean environment is seriously affecting the health of our Orca population. Please ensure they will not be victims of Puget Sound pollution.

PugetSoundPartnership
our sound, our community, our chance

TO: Puget Sound Partnership
FROM: Bill Angle
DATE: 11.21.08
RE: Bill Angle oral comments at Leadership Council

- One hand this Action Agenda is a fine technical job
- On the other hand, I'm concerned that its results will be negligible
- My impression: it's just more of the same approach we've undertaken the last 30 years … but this time we're going to do it really, really well and spend a lot more $$.
- More study, work up a baseline, lot's of coordination, lots of meetings, modest results – sort of a "rear guard" action
- One definition of insanity is to keep doing the same thing over and over again expecting different results
- And if I'm right, Ladies and Gentlemen, we are going to get the same results – the continued demise of our Puget Sound right in front of our collective eyes

- Why? Because we have not properly defined the problem.
- We have described certain <u>symptoms</u> of the problem:
    - ecosystem degradation & non-source point pollution
- But that is **<u>not</u>** the underlying problem.
- The underlying problem is that our economic system is designed to externalize certain economic costs.
- And if we throw our resources at the <u>symptoms</u> while ignoring the underlying problem:

    We will not protect intact ecosystem processes
    We will not restore ecosystem processes
    We will not prevent water pollution at its source
    We will not work together as a coordinated system
And We will not build and implement a new system

We will fail at these actions because the underlying economic problem will remain active, and it is an overwhelmingly more powerful force.

Some of you have read my June 20, 2008 Crosscut article titled: Saving Puget Sound is an Economic Problem. I argue:

We have this juggernaut economic system that is designed to externalize costs, i.e., it's **inherent** in the structure of the economic system. And it will completely overwhelm just about any response that does not include a systemic economic remedy. Why do you think we have been so unsuccessful in addressing this issue?

Non-point-source pollution is an externalized cost of our economic activity. Externalized costs are real costs, but they do not show up in the pricing information for the market system as a whole. So when I pay $400 for a set of tires, none of that money goes to cleaning up the pollution that occurs as those tires wear out. (Multiply this example a million times…ten million times…a hundred million times….) Those real economic costs are "externalized" — they show up as pollution that is destroying our Puget Sound.

Here is the fundamental question facing us: How do we create an economic model of incentives and disincentives that will cause us to quit externalizing those costs? i.e., using Puget Sound as a dump?

Finding an answer to this question is critical. We know laws and regulations can prevent egregious dumping. But a command and control regulatory approach **cannot possibly provide** daily economic signals that will cause each of us to husband resources, use our energy wisely, and pay the true costs of environmental mitigation.

In fact, it just makes people mad…because they see it as interference in their personal lives. And much of the implementation of this Action Agenda will flat run into this problem – government interference overseen by a large bureaucracy with rigidly enforced rules that often don't relate to the facts at hand.

In see little innovation in the Action Agenda…and nothing that leads me to believe we will see different results. I see nothing that acknowledges that:

- **This is first an economic problem.**
- **We cannot plan or regulate our way out of it.**
- **Science and technical fixes cannot overcome pricing signals that result in overwhelming externalized costs.**
- **No bureaucracy can direct the changes required.**
- **Only appropriate incentives and disincentives will actually modify our collective behaviors.**

Finally, here's an example idea that might get some traction. Imagine that the Puget Sound is given the status a non-profit corporation. Every year the State of Washington gives the non-profit One Billion Dollars to spend on repairing itself. The non-profit is responsible for spending that $1 billion in the most effective way possible to restore the Puget Sound's health. They advertize in the "market" for innovative ideas, processes, projects, etc. that will clean up the sound. They select those proposals that appear to give the biggest bang for the buck. This process incentivizes citizens of this state to think about how they make a buck off cleaning up the Puget Sound. <u>It's not about making perfect command and control regulatory decisions, but about creating markets that will eventually result in millions of individual decisions devoted to cleaning up the sound / saving the resource instead of polluting it.</u>

Moreover, it would charges fees to companies and individuals that use the resource – big fees to big users – and pays for restoration efforts based upon market competition and success.

From: Cheryl Angle

Comment: Our group, the Friends of the Cedar River Watershed, is piloting a collaboration between our partners and WRIA8 schools. This specifically supports section E.4.1, specifically E.4.3, to incrase and expand environmental education programs in K-12. We are delighted to have secured seed monies for our Curriculum pilot and are well underway to fund the Implementation phase of this Curriculum. Our Curriculum will train the trainers, focus on empowering the students to measure the sustainabilty of the Cedar River, report results within their school district and communicate their findings more broadly, and provide a model of applied learning that is replicable in other watersheds. We hope to inspire the next generation of watershed stewards by linking them to direct action in our programs in volunteer habitat restoration, salmon recovery and public education. The PSP's 2020 Action Agenda is an excellent tool to help us all support creating a healthy Puget Sound.

From: Anonymous

Comment: I am submitting this for extra credit for my Ocean 260 class at the University of Washington. Please feel free to use any part of my comment as you wish, but I would strongly prefer to remain anonymous.

If the people of the Puget Sound want to keep their environment a habitable place to live, then protecting it will be vital. According to the Draft Action Agenda, the Puget Sound region lacks a comprehensive habitat protection strategy that would protect sites with the highest ecological value. Increasing land development threatens the current state of the sound and could have devastating effects if it is not dealt with properly to ensure the safety of the environment. Protecting the Puget Sound is not only good for the region; it makes financial sense as well. It's much more cost effective to save what we have now than to try to fix what we've destroyed later. Restoring ecological sites is both costly and time consuming —it's much easier to just protect these sights now to avoid the hassle.

The Puget Sound is not just a critical habitat for Washington State, it's a valuable resource for the whole country - it only makes sense to preserve it to the best of our abilities. Protecting the intact habitats of the sound right now is the most efficient way to do that. Preserving water quality will be vital for sustaining the population of Puget Sound. Dams, commercial irrigation and a loss of vegetation cover have degraded aquatic habitats leading to a reduction in native species and overall water quality.

Immediate action should be taken to preserve aquatic habitats —it we cannot do this, we might as well pack our bags now. Aquatic habitats support fish and native species, which not only have cultural significance, but provide income and sustenance to the people of the sound. Without a good supply of water, the sound will be uninhabitable. Current plans don't do enough to regulate streamflows, stormwater management, and water and land use.

Without proper regulation, Puget Sound water quality is at risk for major pollution and depletion, something we should all take very seriously. Short-term protection of farmlands will help maintain the sound's ecosystem, preserve our quality of life and increase viability of rural land. This is important for both farmers and regional habitats. Financial incentives

(grants, tax breaks, etc.) for farmers will help reduce land conversion, keeping valuable ecological sites intact. Even though voluntary stewardship is not a long term solution, it will give us more time to implement a permanent solution. It's a good plan for right now. Removing invasive species will also help ensure the Puget Sound's viability. Invasive species compete with the sound's native species, often smothering them. Native species keep our ecosystem in balance —invasive species rarely do this. Protecting what we have now will require that native species be given optimum chance for survival. Native species together make up the Puget Sound's habitat; they are all important and should be protected not only for their survival, but for ours as people who live in the Puget Sound.

From: Tom Armentrout

Comment: Dear Puget Sound Partnership,

I am prepared to pay higher taxes in order to put into action the recommendation of the plan you have drafted. This plan addresses the major issues that must be addressed. Let's do it

Thank you for your hard work to develop a draft Action Agenda to restore, protect and recover Puget Sound to health by 2020.

I support the following proiorities

-Require low-impact development to reduce stormwater pollution;

-Prohibit new bulkheads near feeder bluffs and forage fish spawning beaches;

-Fund local governments to develop and carry out shoreline master programs;

Fund enforcement staff at state agencies and local governments;

-Implement specific, aggressive cleanup plans for polluted waters, including TMDLs;

-Fully fund a permanent year-round rescue tug at Neah Bay for oil spill prevention;

-Acquire critical intact parcels for habitat protection and conservation;

-Set strong requirements for water quantity, such as setting in-stream flow for all major rivers.

I agree that the final Action Agenda must:

-Clearly identify timelines and responsibilities;

-Identify adequate and sustained funding for the long haul;

-Be a visionary and long term plan;

-Be based on science;

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-Offer a comprehensive and robust program to prevent all sources of stormwater pollution, not just municipal stormwater;

-Strengthen the list of actions for toxic pollution prevention;

-Set meaningful standards for habitat protection;

-Balance regulatory change with land acquisition to accomplish long term recovery goals;

-Expand the indicator species to include more than just salmon, i.e. forage fish, harbor seals, etc.

For Puget Sound!

From: Todd Arnold

Comment: Dear Puget Sound Partnership,

Thank you for your commitment to developing an Action Agenda for a healthy Puget Sound. From struggling orcas to toxic chemicals in our water, the Sound needs quick and decisive action today. I want to make sure we pass a thriving Puget Sound on to future generations.

I urge the Partnership to incorporate accountability, benchmarks of success, and ample funding into this Agenda.

The draft Action Agenda includes many of the essential elements that need to be accomplished, but in addition, the final Action Agenda must also:

-Amend the Cruise Ship MOU to ban all cruise ship discharges in Puget Sound;

-Prioritize the protection and restoration of the State's forage fish spawning beds;

-Complete the Management Plan for the Cherry Point Aquatic Reserve;

-Identify adequate and sustained funding for Plan implementation;

-Update the guidance for open water dredge disposal of PCBs;

-Expand the indicator species to include forage fish abundance and harbor seal toxics loading; and

-Accelerate the restoration of the Elwha River.

Thank you for your hard work to develop a draft Action Agenda to restore, protect and recover Puget Sound to health by 2020.

On behalf of everything from eelgrass to orcas.

From: Dee Arntz

Comment: I have read albeit quickly the Action Plan. I note absence of addressing "wetlands" per se. Is the wetland ecosystem too scary and negative to include? Something along with Harry Potters -- he who cannot be named. I find the absence of an acknowledgement of the role of wetlands in water quality programs to be mystifying. (Oh yes, the word wetlands does appear in section D.4.2.2. Just couldn't avoid it I guess.) There are Critical Area Ordinances that are required to protect wetlands and do these figure in to the solutions and actions for Puget Sound. Please broaden your discussion of ecosystems to include wetlands, importance of maintaining and restoring these natural systems. I find the absence of a discussion of wetlands

confusing and believe it represents a scientific gap. Are wetlands

subsumed under instream flow protections, salmon protections etc.

Eelgrass are in fact considered a wetland ecosystem by the Department of Fish and Wildlife.

I have spent the last 20 years with Audubon advocating for wetlands protection. Where do I fit in???????

I request that your discussions of critical ecosystem functions be expanded and clarified to address the function and status of endangered marshes, bogs, fens, freshwater and saltwater wetland systems that serve to recharge aquifers, purify water of pollutants and offer critical habitat to during the life cycle for 2/3 of bird species.

I appreciate your consideration of these comments.

From: Erin Ashe

Comment: Thank you very much for the opportunity to provide comments on the Action Agenda. The Action Agenda represents great steps forward to recover and conserve the health of the Puget Sound ecosystem. I look forward to the exciting changes ahead.

Please find listed below, four emergent marine conservation issues that might be considered and identified as priority lines of research and management in the final version of the Action Agenda. Thank you for taking the time to read the following comments.

1. Underwater noise. The waters of Puget Sound are a noisy place, and unchecked, these waters will only get louder. This has implications for acoustic habitat loss for a number of acoustically sensitive marine mammal species, most notably southern resident killer whales, but rising ambient noise levels will carry costs to fish as well. There is evidence that larval rockfish use acoustic cues to find reefs on which to settle, and that anthropogenic noise may impact the ability of fish to navigate. It strikes me as useful to monitor anthropogenic noise levels, and to set targets in terms of acceptable background noise levels. This builds on excellent work already being done by NGOs like BeamReach (Scott and Val Viers) and government agencies (NWFSC, NOAA). It has become widely accepted that shipping traffic

needs to be managed to minimize impacts of chronic noise on acoustically sensitive species in US National Marine Sanctuaries (e.g., Stellwagen), as well as in the ter ritorial waters of many European countries. The region could become a testing ground for ship-quieting technologies.

2. Nutritional requirements of top predators. We have good information on abundance of marine mammals and marine birds in the region, but relatively poor information on diet and prey requirements. The Salish Sea could become a test case for ecosystem-based fisheries management, in which the nutritional needs (prey requirements) of top predators are incorporated explicitly into fishing management, rather than being subsumed within a catch-all category of natural mortality of fish. For example, despite 30 years' worth of world-class research on southern resident killer whales, and a recent catastrophic decline in that population thought to be related to prey availability, we still lack good estimates of killer whale metabolic rate. It will always be a challenge to estimate prey requirements of top predators, but killer whales may be one of the easiest places to start, because many studies are investigating their diet and because population size is known with certainty from annual censuses conducted by Center for Whale Research. (For all other species, abundance estimates can carry considerable associated variance or uncertainty.)

3. MPAs. It is great news that you will be working with the State to identify candidate MPAs. But this also has to include federal agencies, which have jurisdiction over marine waters. Again, the SRKWs are a good choice as an iconic species around which to base an MPA campaign. They are popular, and declines in their preferred prey (chinook) has been cited as a factor in recent declines. These issues (MPAs and prey availability for KWs) could be explored in a synergistic manner by identifying areas where whales feed (or are most efficient at catching prey), and proposing such an area for the creation of a no-entry, no-take MPA. This would no doubt have ancillary benefits to rockfish and other prey species.

4. Chinook salmon. The action agenda is welcome news for the many marine species at risk in Puget Sound. In particular, the recovery of Chinook salmon populations is key for the health of the broader marine ecosystem. I would encourage managers and scientist to consider not only recovering the overall number of Chinook salmon available for marine predators and for fishing, but also to consider the number, location and timing of runs. As we know, the Endangered southern resident killer whale population relies heavily on Chinook salmon. Southern resident killer whales have historically depended on nearly year-round availability (of seasonally variable abundance) of Chinook salmon and other salmonid species in Puget Sound as a prey base. Although hatcheries certainly supplement the overall Chinook population, the relatively short duration of hatchery runs and the scarcity of resident Chinook leave killer whales searching for food at times of year, namely winter months, wh en females are most likely to have their calves and are energetically compromised from supporting a new calf. Ensuring that a diversity of salmon runs are healthy and strong is key to killer whale recovery and conservation.

From: Rein Attemann

Comment: Dear Puget Sound Partnership,

Finally, an Action Agenda to save and recover our beloved Puget Sound! Thank you for all your extremely hard work and dedication. This effort could not could not come at a more pressing time, especially for the Sound's iconic and endangered orca whale. Just this month, researchers reported seven orcas "10% of the Puget Sound population" are missing and believed to be dead. Some experts say dwindling populations of endangered Chinook salmon are at least partly to blame. Is this a sign that our ecosystem is on the verge of collapsing?

The urgency of restoring the Sound to health is at a tipping point and missing orcas are the Sound's "canaries in the coal mine," telling us we are running out of time. But there is hope for the orca, as there was hope for the bald eagle, the California Condor and others on the verge of extinction. The Puget Sound Partnership's Action Agenda is a golden opportunity to do what has not been done for over 20 years- develop and implement a recovery plan that is accountable, effective, transparent and decisive with sustained funding to restore this national treasure to health by 2020.

The draft Action Agenda includes many of the essential elements that need to be done:

-Require low-impact development to reduce stormwater pollution;

-Prohibit new bulkheads near feeder bluffs and forage fish spawning beaches;

-Fund local governments to develop and carry out shoreline master programs;

-Fund enforcement staff at state agencies and local governments;

-Implement specific, aggressive cleanup plans for polluted waters, including TMDLs;

-Fully fund a permanent year-round rescue tug at Neah Bay for oil spill prevention;

-Acquire critical intact parcels for habitat protection and conservation;

-Set strong requirements for water quantity, such as setting in-stream flow for all major rivers.

BUT, more than a list of Soundwide and Action Area-specific actions, the Partnership must create a real 2020 Action Agenda, not just a 2-year plan, that clearly identifies the specific actions that are needed over the next 12 years and the HOW and WHO and BY WHEN each action must be completed. All the actions need to be tied together into a comprehensive plan with measurable benchmarks and timelines in order to achieve recovery by 2020. The final Action Agenda must:

-Clearly identify timelines and responsibilities;

-Identify adequate and sustained funding for the long haul;

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-Be a visionary and long term plan;

-Be based on science;

-Offer a comprehensive and robust program to prevent all sources of stormwater pollution, not just municipal stormwater;

-Strengthen the list of actions for toxic pollution prevention;

-Set meaningful standards for habitat protection;

-Balance regulatory change with land acquisition to accomplish long term recovery goals;

-Expand the indicator species to include more than just salmon, i.e. forage fish, harbor seals, etc.

The Partnership staff, the Leadership Council, Ecosystem Coordinating Board, Science Panel and stakeholders throughout the Sound deserve praise for the monumental effort involved in producing the draft Action Agenda. The next step is secure much needed funding. The 2009 legislature must adopt new funding sources dedicated to the recovery of Puget Sound by 2020.

For Puget Sound!

From: Donna Auer

Comment: Dear Puget Sound Partnership,

Thank you for your hard work to develop a draft Action Agenda to restore, protect and recover Puget Sound to health by 2020. When it comes to restoring the health of the Puget Sound, where and how we grow matters.

Perhaps we could slow down growth by NOT promoting it into our state and reduce the target of one million new residents by 2020. It's more crucial than ever to focus growth in ways that do not destroy the urban setting and that protect and preserve our farm and forest land and protect our rural areas to restore critical habitats and watersheds of the Sound.

Additionally, the Action Agenda can and must go farther. All the actions need to be tied together into a comprehensive plan with measurable benchmarks and timelines in order to achieve recovery by 2020.

As you finalize the final Action Agenda, please:

Balance regulatory change with land acquisition to accomplish long term recovery goals;

Identify adequate and sustained funding for the long haul; ? Clearly identify timelines and responsibilities;

Be based on best available science;

Set meaningful standards for habitat protection.

I personally would have liked to see a direct protections action for Orca, which was not listed, although clearly implicated by other protections and renewals.

The Partnership staff, the Leadership Council, Ecosystem Coordinating Board, Science Panel and stakeholders throughout the Sound deserve praise for the monumental effort involved in producing the draft Action Agenda. The next step is secure much needed funding. The 2009 legislature must adopt new funding sources dedicated to the recovery of Puget Sound by 2020.

From: Shane Austin

Comment: Dear Puget Sound Partnership,

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-Accelerate the restoration of the Elwha River.

Thank you for your hard work to develop a draft Action Agenda to restore, protect and recover Puget Sound to health by 2020.

On behalf of everything from eelgrass to orcas.

From: Frank Backus

Comment: Dear Puget Sound Partnership,

I am writing to ask that you to improve your action agendas recommendations on pollution prevention. Puget Sound is too polluted and that is bad for fish, whales, and people. Please act.

From: Frances Badgett

Comment: Dear Partnership,

I'm delighted to see real energy and resources dedicated to the cleanup of Puget Sound. As a citizen who has worked hard in raising awareness about the contamination in Bellingham Bay and the surrounding upland (particularly at the former GP mill site), I'm encouraged by your desire for public input and genuine investment in restoring Puget Sound by 2020. It's encouraging to see such enthusiasm from the state about this issue, but given the inadequate remediation plan for Bellingham's waterfront, I'm concerned that the Partnership is window dressing that will target some easily remediated and restored areas and ignore the very serious contamination like the Log Pond in the Whatcom Waterway. Or the Caustic Groundwater Plume in the upland. Instead, Bellingham is getting a clean Aerated Stabilization Basin (which is already clean, and could serve as a remediation tool, but won't) because of the provision under MTCA about the wishes of the "landowner." (As if the Port of Bellingham is somehow a private owner, not a public agency.)

Despite the public's best efforts to comment (overwhelming public comment on the RI/FS asking for a higher level of cleanup than the Port of had designed), despite grumbling behind the scenes about the inadequacy of the cleanup from prominent officials, despite the cynicism the community now has toward the Port's mega yacht marina and remediation, there appears to be no change in direction. It isn't just the Port's obstinance that has been at issue: Ecology's warm relationship with the Port and lack of response to the public has created a troubling imbalance. The problem remaining, that if you're not going to clean up Bellingham now, with MTCA flush with cash and the public will behind it, it's hard to imagine you'll clean up the entire Sound by 2020. Thank you for your consideration of the comments as you draft your action plan.

From: Sean Bailey

Comment: Dear Puget Sound Partnership,

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-Accelerate the restoration of the Elwha River.

Thank you for your hard work to develop a draft Action Agenda to restore, protect and recover Puget Sound to health by 2020.

On behalf of everything from eelgrass to orcas.

From: Ken Bajema

Comment: Dear Puget Sound Partnership,

I am writing to urge you to improve your action agenda's recommendations on pollution prevention. We are loosing a tremedous amout of bio diversity every year. No one "Ownes" wales so they don't have any value and are not protected. 50% of the worlds species could be gone by 2030

From: Barney Baker

Comment: Thank you for your work on this important project. My comments will focus on priority C of question 3, " Reduce the Sources of Water Pollution". I applaud your stated objective "Use a comprehensive and integrated approach to managing urban stormwater and rural surface water runoff" , and would like to comment on the goals you've made to encourage the use of low impact development to improve water quality.

As stated in priority C, our region is seeing a high rate of growth and accompanying infrastructure such as roads and parking lots where stormwater run-off degrades water quality. I believe we can minimize this non-point source water pollution if we accommodate the growth we will inevitably have, with farsighted development, especially in the area of transportation infrastructure (particularly light rail). In the latter half of the twentieth century we saw population growth follow predictably in the areas where we built roads, highways and freeways. This kind of low density development proved to be destructive to rural areas, but it has given us an example of how transportation modes shape people's lives and

communities. For example, it is very difficult to live in an outlying area if one does not own a car. The challenge of shaping future development into villages as opposed to sprawl will be facilitated by making the right transportation choices now. I envision rural villages where residents can work in the city, yet leave their car at home. Using water quality as a focal point, some of the advantages of investing in public transportation infrastructure are:

- Denser population along light rail lines will leave more open space for stream and lake buffers and groundwater recharge.

- Fewer roads and parking lots will be necessary, meaning less stormwater run-off and water pollution.

- If light rail tracks are elevated through sensitive areas, streams can flow freely beneath, and fish passage remains uninterrupted. Incentives are mentioned in the “Near term actions” section of your draft. What if we offer developers incentives to build low impact, high density villages along light rail lines? These incentives could be tax breaks or technical assistance in green building technologies, but the built in incentive is that the homes and business facilities the developers build will be attractive to buyers because of their location (on the light rail line).

I’ll conclude by saying that I see our investment in public transportation as the issue that determines the success so many others that we deeply care about.

From: Nadja Baker

Comment: I am greatly concerned about the unethical (and should be illegal) dumping of all on board sewage that local whale-watching tour boats are doing while taking tourists on 'wildlife tours' around the waters of San Juan islands and Strait of San Juan de Fuca. This year we lost nearly 10% of 'our' Orcas. I have worked on two different whale-watching boats in the past year as a deckhand and naturalist- which is how I learned of these boats regualar sewage dumping practice. The 'Victoria Star 2', Bellingham Cruise Terminal, Bellingham, the 'Mystic Sea' and the Island Adventure's 'Island Explorer 3', both moored in Cap Sante Marina, Anacortes are definitely NOT pumping out at marinas. While pumping out at the marinas is a free service included with these boat owners high, seasonal moorage fees- they simply choose to dump all waste (from onboard sinks, toilets, washing machines, etc) into the waters of the Puget Sound instead. Please help create stricter accountability by these boat captains and business owners. While they are making a profit, following (stalking?) the Endangered Species, the southern resident Orcas they are simultaneously contributing to their demise through polluting the Salish Sea waters with human waste. Thank you.

From: Arian Balkan

Comment: Dear Puget Sound Partnership,

I am writing to urge you to improve your action agendas recommendations on pollution prevention. Please protect our salmon and whale population.

From: Jack Barbash

Comment: Greetings.

Thank you for your interest in public input for the Puget Sound Partnership's recommendations for actions to try to restore the ecosystems of Puget Sound.

Appended below are comments that I provided along these lines more than two years ago. However, to my dismay, few, if any of them were incorporated into the current set of recommendations. Did you receive my earlier comments? If so, might you (or Your Official Designate) be willing to provide some explanation for why none of these suggestions appear to have been incorporated into the current set of recommendations? For your convenience, here are some of the main suggestions I made back then--and that I continue to maintain would be valuable components of any recovery plan that the Partnership might consider (excerpted from my earlier comments, also provided below):

- A complete moratorium on new bulkhead construction throughout Puget Sound

- An immediate moratorium on the expansion of shellfish farms and other forms of concentrated aquaculture throughout Puget Sound.

- Conducting detailed inventories of the following sources in order to characterize toxic sources and loadings:

(1) Retail sales of all pesticides (i.e., herbicides, insecticides, rodenticides, molluscicides, etc., by active ingredient) and fertilizers at hardware, home-improvement, grocery and other stores.

(2) Retail sales of pharmaceuticals around Puget Sound, to help target areas where inputs of pharmaceuticals are likely to be highest - and thus the need for pharmaceutical collection programs greatest.

(3) Areas where coal tar sealants are used most extensively on parking lots and other pavement.

- Monitoring and assessment programs should include large-scale sampling of surface waters--both on a seasonal basis and immediately following major runoff events, especially following long periods without rain--for those pesticides, fertilizers and pharmaceuticals that are sold in the highest quantities in individual watersheds throughout the Puget Sound basin.

- Evaluation of existing protection actions should include efforts to substantially expand existing measures for supporting organic agriculture, low-impact development, ecologically-based forestry and other land-use practices that have been shown to reduce the adverse impacts of human activities on nearby aquatic ecosystems.

- Such evaluations should also include one or more studies to determine the extent to which reductions in land clearing--such as those mandated by King County's Critical Areas Ordinance--are resulting in reductions in adverse impacts on aquatic ecosystems. For example, consideration should be given to conducting comparative hydrologic studies of water quality (especially with respect to turbidity, temperature and dissolved oxygen) among

adjacent watersheds with different levels of clearing within a given area (e.g., on Vashon-Maury Island), to determine whether variations in the percentages of land in different land-use categories (urban, suburban, agricultural, undeveloped, etc.) correspond with variations in the parameters that control the quality of aquatic habitat.

The Puget Sound region should pioneer a wide range of measures to reduce our per capita emission of greenhouse gases. Such measures should include actions such as the following:

(1) Aggressive improvement in connectivity among different modes of public transit (e.g., coordination between ferries and buses, between buses and light rail, etc.), to encourage more people to commute by public transit, rather than single-occupancy vehicles.

(2) A complete cessation of any reductions in the amount of high-occupancy vehicle lanes on highways, or the opening of any such lanes to high-paying drivers.

(3) Posting signs along all ferry lines throughout Puget Sound, boldly asking people to turn off their car engines in ferry lines - and imposition of penalties on those who ignore them.

- How do we raise the money? One way to help reduce our emissions of greenhouse gases in Puget Sound would be to impose additional taxes on gasoline, and apply the resulting funds to additional support of public transit. While, of course, this might be a politically unpopular strategy to adopt, it would also demonstrate a firm will on the part of our region to reduce our energy consumption and our contributions to the problem of global warming.

- Ensuring that science informs our actions

As noted above, several of the actions recommended above may prove to be politically unpopular. Certainly, many of these actions will be opposed by the various businesses that have heretofore been successful in transferring the environmental consequences of their activities to the aquatic ecosystems of Puget Sound that represent a precious public commons. However, several decades of scientific research provide ample guidance for the types of measures we need to take now in order to safeguard the long-term survival of the myriad species that constitute these ecosystems. I fervently hope that the Puget Sound Partnership will show enough courage not only to recommend that these measures will be taken, but to put in place the types of enforcing legislation that will lead to their actual enactment.

Thank you for reading this, and for providing the public with this opportunity to comment on your plans.

TO: **info@pugetsoundpartnership.org**
RE: Comments on Puget Sound Partnership Draft Recommendations
FROM: Dr. Jack Barbash, Vashon Island, WA

Thank you for giving the public this opportunity to provide input on the most recent draft of the Puget Sound Partnership Recommendations. I have attached a copy of my earlier comments on the WRIA 9 draft Salmon Habitat Plan (submitted to Gordon Thomson on April 25, 2005) to this message because they echo the sentiments expressed below, albeit in much greater detail. Although, of course, those earlier comments referred to a completely different document from the one of current interest, the issues raised by both documents—and my concerns—are virtually identical.

General Comments

While I must admit that I've only read the summary document for the draft recommendations—rather than the full 107-page draft itself—I would like to think that all of the principal points raised by the full document are also included in the summary. Thus, I'm assuming that my concerns regarding the summary are unlikely to have been addressed in the full document.

My principal concern with the recommendations listed in the summary document is that they place far too much emphasis on process, and not nearly enough on actual, concrete actions. While I would anticipate that the response to this criticism is that we need to make sure we get the science right before making specific recommendations, I would argue that most of the scientific research upon which such recommendations must be based has already been done—not all of it, of course, but most of what is needed in order to act now on some of the most critical issues we currently face. Thus, a protracted and ongoing focus on process, rather than directed, deliberate action is, in my opinion, not only inappropriate, but may very well run the risk of causing us to lose even more of the critical ecological resources that we need to protect in Puget Sound than have already been lost to date.

My concern here is that much of this delay has been caused not by genuine uncertainty about what needs to be done, but by a perceived need to avoid making tough choices that are likely to cause substantial "backlash" from the public. If the Puget Sound Partnership is genuinely serious about wanting to take the measures necessary to protect our dwindling ecological resources here in Puget Sound, they must be willing to risk incurring such criticism. Indeed, the relatively recent promulgation of the CAO showed precisely the type of boldness and courage—even in the face of stiff criticism—that is needed to ensure the long-term survival of Puget Sound's natural ecosystems.

Comments on Draft Recommendations

I.A. Protect existing habitat and prevent further losses – Key immediate priority actions

Please consider adding the following actions to this list:

8. **A complete moratorium on new bulkhead construction throughout Puget Sound.** As noted in my more extensive earlier comments on the WRIA 9 draft Salmon Habitat Plan (attached), previous scientific studies appear to have established that shoreline armoring has a profound negative impact on nearshore habitat—and, specifically, on the the eelgrass meadows that are so crucial to the survival of herring, sand lance, surf smelt and other food fish upon which salmon, orcas and other marine life depend. In my opinion, we do not need to do more studies of this phenomenon before we can take action on this issue. Thus, in order to "protect existing [nearshore] habitat and prevent further losses" of eelgrass meadows, these "key immediate priority actions" should include **a complete moratorium on the construction of any new bulkheads or other forms of shoreline armoring throughout Puget Sound.** As is also noted in the attached comments, I'm sure there is enough work that still needs to be done in simply maintaining existing armoring around Puget Sound that such a measure should not seriously endanger the survival of marine construction businesses in the area that are involved with performing such work. If we are serious about the need to protect orcas, salmon, and other species that are critically dependent upon large, healthy tracts of eelgrass in Puget Sound, then we must show the political courage to impose such a moratorium as soon as possible. (We can then figure out what to do to convert existing "hard" armoring to "softer"versions in the hopefully-not-too-distant future.)

9. **An immediate moratorium on the expansion of shellfish farms and other forms of concentrated aquaculture throughout Puget Sound.** Previous research has established that the health and survival of a wide variety of birds, fish, invertebrates and other shoreline-dependent species require both access to the beach substrate and low levels of dissolved nutrients. However, recent proposals by the Department of Natural Resources to allow for substantial expansions of shellfish rearing activities—both in the intertidal zone and in nearshore subtidal areas—would appear to pose serious threats to the accessibility of the beach and subtidal substrates (through the proposed practice of covering beaches and subtidal areas with wire mesh for multi-year periods), as well as to water quality (through the introduction of large quantities of feces, fish food and antibiotics from shellfish and other organisms grown in large floating cages). The urgent need for such a moratorium is further heightened by the fact that the long-term effects of such intensive aquacultural practices are largely unknown. In light of the lack of understanding of these effects—and what I would consider to be a strong likelihood that the effects of such large-scale modifications of the shoreline and nearshore environments could be

substantial—the expansion of such activities within Puget Sound should be halted immediately. Only when it has been established—through peer-reviewed scientific studies conducted by one or more public agencies, rather than by the companies who are applying for the right to conduct these operations—that such activities exert negligible deleterious effects on the marine and shoreline-dependent species in Puget Sound, should the expansion of such activities be permitted.

I.B. Restore the amount and quality of habitat, and reduce fragmentation – Key immediate priority actions

The removal of creosote logs (item 2.c) should only be permitted if it can be (or has been) established that the removal of these logs does not cause more harm than benefit. It seems possible that many of these logs and other treated structures may have been exposed to the marine environment for long enough that they pose negligible current risk to nearby biota. On the other hand, their removal might release far more polynuclear aromatic hydrocarbons and other toxic components of creosote than is currently being released by the existing structures.

I.C. Significantly reduce toxics entering Puget Sound fresh and marine waters – Key immediate priority actions

Any "characterization of toxic sources and loadings" (item 2) must include detailed inventories of the following sources:

(1) Retail sales of all pesticides (i.e., herbicides, insecticides, rodenticides, molluscicides, etc.—by active ingredient) and fertilizers at hardware, home-improvement, grocery and other stores. Only by identifying the types and amounts of these compounds that are being sold—and, by inference, applied—in different parts of the Puget Sound basin will it be possible to tailor both water-quality sampling and source-reduction efforts to the individual watersheds in which these compounds are being released. As you may know, such data have already been collected and reported—albeit on a somewhat limited scale—by the Washington Toxics Coalition (e.g., http://www.washingtonfreepress.org/77/toxicTradeoff.shtml). Furthermore, a Partners In Education grant is currently funding the collection of such data by the Vashon-Maury Island Ground Water Protection Committee (http://dnr.metrokc.gov/wlr/wq/vashon-maury-island-committee.htm).

(2) Retail sales of pharmaceuticals around Puget Sound, to help target areas where inputs of pharmaceuticals are likely to be highest—and thus the need for pharmaceutical collection programs greatest.

(3) Areas where coal tar sealants are used most extensively on parking lots and other pavement. Recent research by the U.S.Geological Survey has demonstrated that the release of polynuclear hydrocarbons and other toxic compounds is higher

from areas where coal tar sealcoat is used to cover pavement than those where such sealants are not used (http://tx.usgs.gov/coring/pubs/parking%20lot%20sealants.pdf). It is therefore important to gain an understanding of where these materials are applied, in order to target those watersheds where the reduction in the use of these sealants should be a high priority.

I.D. Significantly reduce pollution from human and animal wastes in fresh and marine waters – Key immediate priority actions

As noted above, addressing this objective must include a fourth item, namely a **complete moratorium** on the expansion of large-scale shellfish rearing and other aquaculture operations in Puget Sound. This is essential for reducing the influx of additional fecal wastes into the sound—in this case from shellfish and other organisms grown by such operations.

I.E. Improve water quality and habitat by managing stormwater runoff – Key immediate priority actions

As noted above, addressing this objective should include a curtailment—if not an outright ban—on the use of coal-tar-based sealcoat on parking lots and other types of pavement around Puget Sound.

I.G. Protect ecosystem biodiversity and recover imperiled species – Key immediate priority actions

Nearly all of the measures recommended above will help to promote progress toward this objective, i.e.:

(1) Complete moratorium on the construction of any new bulkheads or other form of hardened shoreline armoring around Puget Sound

(2) Inventories of the amounts of pesticides, fertilizers and pharmaceuticals sold (and thus released) in different watersheds around Puget Sound

(3) Complete moratorium on the expansion of large-scale aquacultural operations in Puget Sound

(4) Curtailing or banning the use of coal-tar sealcoat on pavement throughout the region

I.H. Build and sustain our capacity for action – Key immediate priority actions

Monitoring and assessment programs (item 3) should include the following components:

(1) Identification (based on the inventory studies mentioned earlier) of the pesticides, fertilizers and pharmaceuticals that are sold (and therefore released) in the highest quantities in different watersheds within Puget Sound

(2) Large-scale sampling of surface waters—both on a seasonal basis and immediately following major runoff events, especially following long periods without rain—for those pesticides, fertilizers and pharmaceuticals that are sold in the highest quantities in individual watersheds throughout the Puget Sound basin.

Evaluation of existing protection actions (item 5) should include efforts to substantially expand existing measures for supporting organic agriculture, low-impact development, ecologically-based forestry and other land-use practices that have been shown to reduce the adverse impacts of human activities on nearby aquatic ecosystems.

Such evaluations should also include one or more studies to determine the extent to which reductions in land clearing—such as those mandated by King County's Critical Areas Ordinance—are resulting in reductions in adverse impacts on aquatic ecosystems. For example, consideration should be given to conducting comparative hydrologic studies of water quality (especially with respect to turbidity, temperature and dissolved oxygen) among adjacent watersheds with different levels of clearing within a given area (e.g., on Vashon-Maury Island), to determine whether variations in the percentages of land in different land-use categories (urban, suburban, agricultural, undeveloped, etc.) correspond with variations in the parameters that control the quality of aquatic habitat.

The "development of a regional effort to prepare for climate change" should go further than simply preparing for climate change. Instead, the Puget Sound region should pioneer a wide range of measures to reduce our per capita emission of greenhouse gases. Such measures should include actions such as the following:

(1) Aggressive improvement in connectivity among different modes of public transit (e.g., coordination between ferries and buses, between buses and light rail, etc.), to encourage more people to commute by public transit, rather than single-occupancy vehicles.

(2) A complete cessation of any reductions in the amount of high-occupancy vehicle lanes on highways, or the opening of any such lanes to high-paying drivers.

(3) Posting signs along all ferry lines throughout Puget Sound, boldly asking people to turn off their car engines in ferry lines—and imposition of penalties on those who ignore them.

IV. Funding to build and maintain protection and restoration

How do we raise the money? (Item 4) One way to help reduce our emissions of greenhouse gases in Puget Sound would be to impose additional taxes on gasoline, and apply the resulting funds to additional support of public transit. While, of course, this might be a politically unpopular strategy to adopt, it would also demonstrate a firm will on the part of our region to reduce our energy consumption and our contributions to the problem of global warming.

V. Ensuring that science informs our actions

As noted above, several of the actions recommended above may prove to be politically unpopular. Certainly, many of these actions will be opposed by the various businesses that have heretofore been successful in transferring the environmental consequences of their activities to the aquatic ecosystems of Puget Sound that represent a precious public commons. However, several decades of scientific research provide ample guidance for the types of measures we need to take **now** in order to safeguard the long-term survival of the myriad species that constitute these ecosystems. I fervently hope that the Puget Sound Partnership will show enough courage not only to recommend that these measures will be taken, but to put in place the types of enforcing legislation that will lead to their actual enactment.

Thank you for reading this, and for providing the public with this opportunity to comment on your plans.

Best of luck with your work!

Dr. Jack Barbash
Vashon Island, WA
AhimsaFirst@earthlink.net

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Comment Form

Draft Salmon Habitat Plan

Green/Duwamish and Central Puget Sound Watershed (WRIA 9)

http://dnr.metrokc.gov/Wrias/9/HabitatPlan.htm

Please submit comments by <u>Monday, April 25, 2005</u>

Please use a separate row for each project, program, policy, or other topic you are commenting on. Copy and paste rows as needed.

You can download copies of this form from http://dnr.metrokc.gov/Wrias/9/commentformpublic.doc

Send your comments electronically to Gordon Thomson, gordon.thomson@metrokc.gov, or by US mail, Gordon Thomson, Plan Manager; WRIA 9 Habitat Plan; 201 S. Jackson St., Ste. 600; Seattle, WA 98104-3855. For questions, call Gordon at 206-296-8013.

Your name: ***_Dr. Jack Barbash_____*** **City of residence:** ***__Vashon, WA__***

Street address (optional): _____ **Zip (optional):** _____

E-mail (optional): ***__AhimsaFirst@earthlink.net_____***

Question	Page	Action	Comment
What projects, programs, and policies in the *draft* Habitat Plan do you most strongly **SU** in Habitat Plan? **SAMPLE COMMENT**	273	LG-153	Keep in the plan. This action will also improve _____. Adjacent property owners are supportive.
What projects, programs, and policies in the *draft* Habitat Plan do you most strongly **SUPPORT** and want included in the final Habitat Plan?			To the great credit of its many creators, this draft Habitat Plan has so many commendable features that I simply don't have time to list them all. However, some of the components that are most appealing include the following: • Use of "best available science" as its fundamental basis (p. 4-5, end of third paragraph). As long as this remains the principal driving force behind this plan (rather than political expediency), we'll have the best chance at saving the species and ecosystems it was designed to protect. • Acknowledgement of ballast water discharge and aquaculture industry as major sources of non-native species (p. 3-16) • All of the components of Education and

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Question	Page	Action	Comment
			Stewardship recommendation designated "ES2" on p. 6-11—but especially the first one. It is also hoped that the last of the components given ("Stewardship component of farm plans") includes the use of signage to publicize ecologically sustainable land management practices by individual farmers (can't remember if these signs are from a State or a King County program)—much like the signage displayed by individual property owners for the "Natural Yard Care" program or King County's "Stewardship Forest" program. All of these approaches for "Setting the Norm" seem to have great potential for transforming the general culture of a given area to one that gives much greater support to ecologically friendly land management practices. • All of the components listed under incentives IN1 and IN2 (pp. 6-9 – 6-10).

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What project, program, or policy would you **ADD** to the Habitat Plan? In other words, **WHAT IS MISSING** from the *draft* Habitat Plan? **SAMPLE COMMENT**	N/A	N/A	Draft does not address conservation hypothesis __; habitat action is needed between RM ___ and ___ to address this hypothesis. OR Draft does not include policy related to _____, which would address conservation hypotheses __ and __.
What project, program, or policy would you **ADD** to the Habitat Plan? In other words, **WHAT IS MISSING** from the *draft* Habitat Plan?			Given its clear emphasis on the need for recommended actions to be based on the best available science, it is quite disappointing—and not a little bit surprising—to note that this plan lacks <u>any</u> discussion of the option of a <u>complete</u> moratorium on the construction of NEW bulkheads in WRIA 9—if not <u>all</u> of Puget Sound—especially given the obvious REGIONAL importance if Vashon-Maury Island's intact terrestrial and nearshore ecosystems, demonstrated by your recent beach seining study. It is presumed that this omission was not an oversight, but rather the result of a conscious decision to eliminate this recommendation because it would have lacked sufficient political support, and thus would not pass Feasibility and Effectiveness Screening Criteria numbers 3 and 11 (Appendix H, p. 50). Such a decision, however, is nonetheless surprising, given the clear scientific basis laid out so clearly on page 3-6 for stopping—and, if possible, reversing—the spread of <u>new</u> bulkheads. It is also surprising in light of the fact that "removing shoreline armoring" was deemed to be a Tier 1 Conservation Hypothesis for the Marine Nearshore Subwatershed (Near-3). If <u>removing</u> shoreline armoring is viewed to be so important as to be part of a Tier-1 Conservation Hypothesis, how can the study authors justify not even mentioning the <u>possibility</u> of a moratorium on <u>NEW</u> bulkheads? (I would hope that the decision wasn't made on economic grounds, since there is probably PLENTY of marine construction work to be done simply maintaining existing bulkheads in Puget Sound!) This situation suggests another important element that is missing from the proposed approach. (See next item below.)
What project, program, or policy would you **ADD** to the Habitat Plan? In other words, **WHAT IS MISSING**			The complete failure to even <u>mention</u> the option of a moratorium on all <u>new</u> bulkhead construction in WRIA 9—an obvious strategy for halting and reversing the well-known adverse effects of shoreline armoring (as

from the *draft* Habitat Plan?			noted above)—suggests the need for far more transparency in the process by which the Feasibility and Effectiveness criteria were applied to all of the individual draft actions that were originally proposed. Since it is presumed that the suggestion for a complete moratorium on all new bulkhead construction in WRIA 9 was evaluated against the Feasibility and Effectiveness critieria—and rejected—this decision should be made a part of the public record. In addition to the obvious benefits associated with increased transparency in policy decisions by public agencies, this system would also have the advantage of presenting the public with the <u>full</u> menu of actions considered by the WSC staff (in January 2005, according to the discussion on p. 6-15), as well as the formal basis for eliminating each of the actions that were discarded by the WSC staff. (The application of Feasibility and Effectiveness Screening Criteria numbers 3 and 11 [Appendix H, p. 50] seems especially significant in this regard.) Such information would be valuable for future re-evaluations of these actions, should new circumstances in the future (e.g., a significant increase in public support for a moratorium on new bulkhead construction) make them more feasible. Public availability of this information would also enable local jurisdictions to experiment with new ways to implement the previously eliminated actions. A *de facto* (if not legally mandatory) moratorium on all new bulkhead construction, for example, might be achieved in a given community if substantial efforts were made (through public announcements and local newspapers, radio stations and other media outlets) to publicize all individual proposals for new bulkheads (which would presumably require the issuance of construction permits from a publicly-funded agency anyway). This might be the "stick" part of a "carrot and stick" approach, wherein the proposal would be made more public if the landowner showed no willingness to work with WRIA 9—or their local community—to come up with an alternative to a new bulkhead (according to the fourth component of ES2 on p. 6-11). In addition to the willingness of WRIA 9 personnel to work with landowners to help them avoid the construction of new bulkheads, another potential "carrot" in this process might involve the purchase of as many conser-

			vation easements as possible along shorelines to prevent the construction of new bulkheads. Thus, this plan should attempt to maximize the amount of funding made available to purchase such conservation easements.
What project, program, or policy would you **ADD** to the Habitat Plan? In other words, **WHAT IS MISSING** from the *draft* Habitat Plan?			The Near-4 Conservation Hypothesis (p. 4-27) states that "protecting and expanding forage fish spawning areas by maintaining/increasing high intertidal zone access and maintaining/increasing availability of suitable substrate sizes will lead to greater juvenile salmon growth and higher survival." Following the guidance of this hypothesis would seem to require that Glacier Northwest's request to revive its old dock for loading such large gravel barges off the east coast of Maury Island be denied. It is presumed that, like a potential moratorium on all new bulkhead construction, this action was also considered, but rejected as being "seriously flawed" (p. 6-15) during the feasibility and effectiveness evaluation because of political unpopularity. This therefore provides another excellent example of why <u>all</u> of the proposed actions considered by the WSC staff—<u>including</u> those rejected by them—should be made public, presumably through the same website from which the public comments are currently available. (Great job on getting those comments together, by the way!)
What project, program, or policy would you **ADD** to the Habitat Plan? In other words, **WHAT IS MISSING** from the *draft* Habitat Plan?			Instead of investing scarce funds into promoting soft armoring of shoreline properties, this funding would probably be more effectively invested in simply helping people to move their houses away from unstable areas.
What project, program, or policy would you **ADD** to the Habitat Plan? In other words, **WHAT IS MISSING** from the *draft* Habitat Plan?			The science background for the plan does not include any surveys of food availability in Puget Sound, but should. Such surveys should include summaries of the abundance and temporal and spatial distributions of both primary food sources (i.e., plant matter) and forage fish.
What project, program, or policy would you **ADD** to the Habitat Plan? In other words, **WHAT IS MISSING** from the *draft* Habitat Plan?			Synthetic pesticides and fertilizers have been shown to exert substantial negative impacts on the health of aquatic biota. As a result, in Table 3-2 (p. 3-14), the following item should be added to the list of items given under "Examples of activities or impacts related to factor of decline" for the "Reduced water quality" factor: "use of synthetic pesticides and fertilizers in

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			both agricultural and non-agricultural settings". This same item should also be added to the corresponding cell in Table 3-3, since the application of these compounds to shoreline properties can affect water quality in adjacent nearshore aquatic ecosystems. (NOAA work, for example, has shown that several organophosphate insecticides can shut down salmon's sense of smell—and thus their ability to find their natal streams.)
What project, program, or policy would you **ADD** to the Habitat Plan? In other words, **WHAT IS MISSING** from the *draft* Habitat Plan?			Add the "Vashon Forest Stewards" to the list of organizations whose support is recommended in Programmatic Support item P1 (p. 6-8), since the work of the Forest Stewards contributes directly to the improvement and maintenance of forest ecosystem health on Vashon-Maury Islands.
What project, program, or policy would you **ADD** to the Habitat Plan? In other words, **WHAT IS MISSING** from the *draft* Habitat Plan?			In light of the interest in identifying and removing barriers to fish passage (programmatic support item P4 on p. 6-8), community input should be sought for identifying locally based methods for removing <u>all</u> such barriers shown on the online map displaying the results from Washington Trout's stream-typing survey of Vashon-Maury Island. Although the current plan only identified six such barriers of importance to the recovery of chinook populations on Vashon-Maury, locally-based, inexpensive approaches for removing <u>all</u> barriers to fish passage on island streams should be investigated and encouraged.
What project, program, or policy would you **ADD** to the Habitat Plan? In other words, **WHAT IS MISSING** from the *draft* Habitat Plan?			King County should be encouraged to consider a broader range of septic system designs than is currently permitted.
What project, program, or policy would you **ADD** to the Habitat Plan? In other words, **WHAT IS MISSING** from the *draft* Habitat Plan?			In light of the well-known threats posed by synthetic pesticides and fertilizers to aquatic biota, this plan should recommend ways to reduce or eliminate the use of these compounds on Vashon-Maury Islands, since their use directly endangers the quality of the only water supply available to the Vashon-Maury community—our sole-source aquifer. One of the most feasible approaches for discouraging the use of these compounds might involve the posting of informational signs in the places where the compounds are sold (on Vashon-Maury, these are the hardware stores), to inform potential purchasers of the chemicals about the potential threats to aquatic biota posed by these compounds. (The manager of at least one of the two

			hardware stores on Vashon has said that he would be willing to post such signs.)
What project, program, or policy would you **ADD** to the Habitat Plan? In other words, **WHAT IS MISSING** from the *draft* Habitat Plan?			As an added incentive to the list of actions provided under Incentive IN-1 on p. 6-9, consider adding something akin to the following: • Free, voluntary fence-building services for any land-owner wishing to fence off riparian areas to exclude livestock from these areas and surface waters. (On Vashon-Maury Island, the Forest Stewards could provide the wood for such fences, while perhaps Habitat Plan funds could be used to pay EarthCorps or similar workers to construct them, preferably without the use of any materials other than the wood itself.)
What project, program, or policy would you **ADD** to the Habitat Plan? In other words, **WHAT IS MISSING** from the *draft* Habitat Plan?			Consider instituting a quarterly monitoring program to measure turbidity, dissolved oxygen, coliform bacteria, temperature and nitrate in all major streams on Vashon-Maury Island on a quarterly basis. Such data would provide a valuable test of the effectiveness (or lack thereof) of King County's Critical Areas Ordinance for improving water quality by examining correlations between degree of retention of native vegetation (or impervious surface coverage) and these parameters—all of which can affect the ability of native fish to survive and reproduce.
What project, program, or policy would you **ADD** to the Habitat Plan? In other words, **WHAT IS MISSING** from the *draft* Habitat Plan?			Most aquaculture operations have been shown to exert substantial negative effects on nearby aquatic ecosystems, through large outputs of fish waste, antibiotics, other pharmaceuticals and other compounds added directly to enclosures containing the farmed fish. Consequently, the word "aquaculture" should be added to the list of items given in the first line ("Reduced water quality") of Table 3-3, under the heading "Examples of items related to factor of decline." Also, in this same line in Table 3-3, the phrase "chemical contaminants" under "Description" should be amended to read "chemical and microbiological contaminants," to account for the impacts of disease pathogens and other undesirable microorganisms that may enter the hydrologic system from animal feces, septic systems and other sources.
Do you have questions or comments about the policy?	637	Du-194	This project would also address Conservation Hypothesis __ and __.

SAMPLE COMMENT

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Other questions, comments, or suggestions regarding the *draft* Habitat Plan:			Implementation section should more clearly lay out _____.

SAMPLE COMMENT

Please answer the following question at the end of public meeting or when you have completed reviewing the *draft* Habitat Plan:

Based on your understanding of the *draft* Habitat Plan, which of the following best characterizes your view of it?

__ I support the *draft* Habitat Plan pretty much as written

√ I would support the *draft* Habitat Plan if modified to include the changes I suggested above

__ I do not support the *draft* Habitat Plan

__ Don't know/not sure

__ Other _____

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From: Edward Barnes

Comment: Dear Puget Sound Partnership,

Thank you for your commitment to developing an Action Agenda for a healthy Puget Sound. From struggling orcas to toxic chemicals in our water, the Sound needs quick and decisive action today. I want to make sure we pass a thriving Puget Sound on to future generations.

I urge the Partnership to incorporate accountability, benchmarks of success, and ample funding into this Agenda.

The draft Action Agenda includes many of the essential elements that need to be accomplished, but in addition, the final Action Agenda must also:

Amend the Cruise Ship MOU to ban all cruise ship discharges in Puget Sound;

Prioritize the protection and restoration of the State?s forage fish spawning beds;

Complete the Management Plan for the Cherry Point Aquatic Reserve;

Identify adequate and sustained funding for Plan implementation;

Update the guidance for open water dredge disposal of PCBs;

Expand the indicator species to include forage fish abundance and harbor seal toxics loading; and

Accelerate the restoration of the Elwha River.

Thank you for your hard work to develop a draft Action Agenda to restore, protect and recover Puget Sound to health by 2020.

On behalf of everything from eelgrass to orcas.

From: Nikki Barnes

Comment: Dear Puget Sound Partnership,

I am writing to urge you to improve your action agendas recommendations on pollution prevention.

From: Chase Barton

Comment: Dear Puget Sound Partnership,

I am writing to urge you to improve your action agendas recommendations on pollution prevention.

Washington state spends tens of millions of dollars each year cleaning up pollution and billions of dollars each year in health care costs treating diseases linked to environmental pollutants. Yet, at the same time polluters continue to use toxic chemicals that contaminate Puget Sound and our bodies, without paying for the true cost of their pollution. It's time wildlife and taxpayers got off this toxic treadmill.

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From: Chase Barton

Comment: Dear Leadership Council,

Thank you for the opportunity to comment on the Puget Sound Partnership Draft Action Agenda. I appreciate the tremendous amount of work that has gone into developing it and I support the strong list of measures that, if implemented, will go a long way toward recovering Puget Sound by 2020.

The draft plan includes a few omissions. The final plan should include Outstanding Resource Water (ORW) designation under the Clean Water Act as a tool to help protect rivers and other aquatic habitat. While I strongly support the inclusion of Wild and Scenic designation as a similar tool, in some cases ORW designation will likely prove to be a better, more immediate way for the state to ensure the protection of high quality rivers and other waters. Therefore, I urge the Partnership to include support for the Outstanding Resource Water designation as one of its "Near Term Actions." ORW designations permanently protect high quality waters that are ecologically significant, provide cold water refuges for fish, and/or support important recreational values. Many rivers in the Puget Sound region are eligible for ORW designation. I would also like to encourage you to include funds to move up the removal of the two dams on the Elwha from 2012 to 2010. Removal of the Elwha dams is one of the best chances for salmon and steelhead recovery in the region as it will open up over 70 miles of prime spawning habitat. Removing these dams has also been as a key action to recover our Puget Sound's orca population, which is malnourished thanks to a lack of chinook salmon.

Especially during difficult financial times, finding opportunities for economic benefit and job creation is important. Removing the Elwha dams provides a tremendous opportunity for creating "green jobs" and numerous other economic benefits.

Thank you for taking my comments into consideration.

From: Peter Beaulieu

Comment: Terry Williams proposed the need for more water storage on the Snohomish River, partly for consumptive needs and partly for instream flow needs especially during increasing periods of low flow.

There is a history to this issue.

In the 1970s the Snohomish Mediated Agreement was completed. This was a balanced package of 10 or 15 actions including a multi-purpose dam on one of the ustream tributaries. The effort was originally convened by Gov. Dan Evans, and was recognized as the first large environmental (ecosystem) mediation projects in the United States. Gerry Cormick was the mediator, and the effort spawned mediation institutes at universities across the country.

The Agreement illustrates all of the strengths and weaknesses of mediation, including in this case the linchpin institutional aspects of a multipurpose dam -- which could only be adequately paid for with revenues from water supply sales. That is, the presumed market

area was the Seattle, which was brought into the mix only later. By this time Seattle was engaging in a parallel planning effort for the Cedar-Green Basin to the south. (In 1980-83 chaired the Advisory Committee of agency reps and citizens, and we did fold in a concurrent interbasin layer to our festities.) The complexity and constructive tone of this entire interbasin overlay requires more time than you have or could possibly be interested in. This interbasin challenge and opportunity was one of the regional issues leading to the creation in 1977of the collaborative Water Resources Committee which I have documented in past care packages to your Partnership staff. Terry Williams was a loyal participant.

I just wanted you to know there is a history, and several layers of now aging plans and studies at all levels of government. The key difference between the benefit-cost analysis of this proposal and the earlier and completed Hanson Dam on the Green, is that in this development in the protected flood plane was no longer eligible to be considered as a "benefit". By Congressional action, urban relocation within the region could no longer be used to skew Corps of Engineers conclusions. Hence, the Snohomish Valley is still agricultural and the Green/Duwamish is a a warehouse wonderland.

But I digress. In the middle of the Mediated Agreement saga, Congressmen and local dignitaries (e.g., Senator Magnuson) attended a gala affair in the Valley to sign the Agreement, twelve years in the making, only to find two years later that as the Corps of Engineers worked its way down their technically oriented checklist a potential early action (core samples) revealed that the dam site was a liquefaction zone. A classic object lesson on the potential disconnect between highly relevant and sequential technical analysis, on the one hand, and policy development, on the other. Some actions have been taken, or modified, including setback levies in the valley for judicious flood control.

Should you want further documentation (plan names, and dates, and contents) I stand ever ready to darken you inbasket with additional memories and references.

From: Susan Bechtholt

Comment: Dear Puget Sound Partnership,

I am writing to urge you to improve your action agenda's recommendations on pollution prevention.

From: Cindy Beckett

Comment: After reading the report about chemicals in the Sound still killing our Orcas (and Chinook), it strikes me that no-one has included the ciritcal information reported 2 years ago regarding the extent of soils contamination in this area from the Asarco plant in Tacoma. I have worked on issues including this one, and as a result of investigating the high concentration numbers in nearby soils coupled with an in depth study of Asarco's operating history, the TPCHD & EPA jointly did a soils study that confirmed sufficiently high concentrations of arsenic & lead outside the plume area, confirmed all the way from Tacoma to Olympia, that resulted in the "Dirt Alerts" that have been run continuously for nearly 2 years now advising people to cover

their open soils and wash everything inside their houses weekly. The area that was the initial trigger is located on the steep slope on the Tacoma side over the Narrows Inlet. Those numbers were some of the highest that EPA had ever seen. It is a toxic list and very scary.

In spite of public release of these findings, neither Taooma nor Pierce County made any changes to their development criteria that would require soils testing be done before land is disturbed. I have countless photographs of potentially contaminated highly silted water running off into storm drains during construction in many locations in this county. Without even testing for what contaminants are present and in what concentrations, there is the very real possibility that the arsenic, zinc, lead and cadmium as well as many other "baddies" are still washing into the Sound in the stormwater. As you hopefully know, many of the stormwater outlets in Pierce County have no filtration systems and are outlet directly into streams and creeks, where the untested and untreated water runoff makes it's way to the Sound. I would appreciate someone's time to discuss this issue.

From: Mike Beegle

Comment: Dear Puget Sound Partnership,

Thank you for your commitment to developing an Action Agenda for a healthy Puget Sound. From struggling orcas to toxic chemicals in our water, the Sound needs quick and decisive action today. I want to make sure we pass a thriving Puget Sound on to future generations.

I urge the Partnership to incorporate accountability, benchmarks of success, and ample funding into this Agenda.

The draft Action Agenda includes many of the essential elements that need to be accomplished, but in addition, the final Action Agenda must also:

-Amend the Cruise Ship MOU to ban all cruise ship discharges in Puget Sound;

-Prioritize the protection and restoration of the State's forage fish spawning beds;

-Complete the Management Plan for the Cherry Point Aquatic Reserve;

-Identify adequate and sustained funding for Plan implementation;

-Update the guidance for open water dredge disposal of PCBs;

-Expand the indicator species to include forage fish abundance and harbor seal toxics loading; and

-Accelerate the restoration of the Elwha River.

Thank you for your hard work to develop a draft Action Agenda to restore, protect and recover Puget Sound to health by 2020.

On behalf of everything from eelgrass to orcas.

From: GayLynn Beighton

Comment: Hello Puget Sound Partnership,

My suggested changes to the Draft Agenda are below:

With regards to Priority A: Protect Intact Ecosystem Processes, Structures and Functions Question 3,Page 5 paragraph with five bullet points beginning "The Action Agenda identifies a comprehensive protection strategy for Puget Sound ecosystems that reflects five primary objectives: (1st bullet)

Focus growth away from ecologically important and sensitive areas by mandating dense, compact cities and vital rural communities in a manner whereby each jurisdiction is accountable for said manner of development under GMA. Any/all proposed expansion(s) of an existing UGA located in a Puget Sound Action Area shall only be eligible for expansion if the existing population density of said existing UGA exceeds that minimum population density required for efficient urban mass transit (e.g. minimum 7 dwelling units/acre average for said entire existing UGA).

With regards to the non-bold subparagraph under Priority A: Protect Intact Ecosystem Processes, Structures and Functions Question 3,Page6 paragraph A.1 beginning: Focus growth away from ecologically important and sensitive areas by encouraging dense, compact cities, vital rural communities, and protected areas that support the ecosystem Sound-wide.

(Next paragraph) Attractive pedestrian friendly cities with appealing neighborhoods, open and vegetated spaces, quality schools, efficient mass transit transportation systems, and cultural amenities provide a quality of life. Thank you for the opportunity to comment.

From: Mark Beisse

Comment: Dear Puget Sound Partnership,

In response to your November 6 e-mail providing the Action Agenda, comments herein are being provided to supplement what I sent on October 23.

I have quickly read the paper and remain concerned that a light rail transportation system would more efficiently and effectively keep the urban growth area within its existing footprint. Transportation improvements may be more influential as a land use control than other such tools you describe.

We have had a tendency in this Nation to nickel and dime parcels into suburban uses through successive decades of passing environmental protection responsibilities to future generations. In the case of Puget Sound, it happens because the structure of governments is fractionated into local units that are smaller than the Sound. Today's elected officials assume they need to limit judgments to those delimited jurisdictions. They fail to adopt regional policies in their land use decisions. Even a 3-county Sound Transit is too small, but its long-range plan likely has no official status for normal units of government.

Public agencies need to distinguish between bus transit and rail since buses are individually driven vehicles that probably promote sprawl more than stop it. However, few cities, counties or other governmental organizations here make this distinction except Sound Transit. For us to be successful by 2020, the targets, indicators and benchmarks will need to consider progress toward a plan at least 65-100 miles in length rather than the skimpy rail network adopted by the voters this year.

The full text of my earlier statement, which remains current, is as follows:

This letter is in response to the Seattle Post-Intelligencer update today about the progress of the Puget Sound Partnership.

My concern after giving your Web site a cursory review is that the critical role inappropriate urban planning plays in the impacts on the Sound has not been recognized, especially of transportation capital improvements or lack thereof. As a 34-year employee of United States Department of Transportation (Retired), comments herein are my own and do not reflect Government policy.

Any coattails of Governor Gregoire for King, Pierce and Snohomish County urban areas might fail on region-wide light rail. I felt after the defeat in 2007 we would not achieve that. I am unconvinced it will be built in my lifetime. The significantly reduced scheme is on the ballot this year. I hesitate to say the electorate may be wrong, although it would leave the shuttle from Husky Stadium under construction and opening in 2016 that connects with the line commencing service in 2009 to SeaTac.

Automobile-orientation has been so firm here that it is illegal for Seattle pedestrians to be on a roadway with no sidewalks as oncoming automobiles approach. That may be fine now that we think you might always require the vehicle to do what feet should; however, the Sound clean-up will depend on reduced stormwater runoff and suburban sprawl caused by using individually driven vehicles. Our experience with Western style cities on the Sound is at least 150 years shorter than on the East Coast.

Chesapeake Bay, the Nation's largest estuary, remains polluted after remediation. The loss of rural land and open space that protect the bay was well underway by 1976 when the key rail system of that watershed opened. Likewise in Washington State we wasted the opportunity to use rail for limiting problematic land uses, but you might study it.

I suggest you plan an appeal to local agencies responsible for land use controls alerting them the Partnership efforts will be lost without their help to limit growth boundaries.

From: Lola Bennington

Comment: Your priorities are messed up. The first class A priority should be source control of pollutants or as you phrased it in Priority C.1: Prevent pollutants from being introduced in the Puget Sound ecosystem to decrease the loadings from toxics, nutrients, and pathogens. The second class A priority is to cleanup existing contamination once source control has been accomplished. The success of all other priorities depends on these two being accomplished. For example it is just plain silly to build a restoration site (priority B.1) where source control

(priority C.1) is not achieved the site will re-contaminate and may actual become an attractive nuisance, leading fish and other creatures into habitat zones where their exposure to contamination is actually increased.

From: Irene Bensinger

Comment: Dear Puget Sound Partnership,

You will be receiving many, many letters urging you to do all the right things to restore and preserve the health and vitality of our unique Puget Sound.

May I add my voice, reminding you that failing to put an end to the streams of herbicides and pesticides streaming into the Sound will only put us on course to become the Chesapeake Bay West.

Please be bold and resist whatever pressures the petro-chemical corporations may apply. Their sales (and yes, the jobs those sales represent) simply must not come at the cost of our whales, our salmon, our sound and our honorable stewardship.

I hope you will do all you can to restore and protect Puget Sound for now and for the long future.

Thank you very much for taking the time to read this.

From: Patricia Bereczki

Comment: Dear Puget Sound Partnership,

Thank you for your commitment to developing an Action Agenda for a healthy Puget Sound. From struggling orcas to toxic chemicals in our water, the Sound needs quick and decisive action today. I want to make sure we pass a thriving Puget Sound on to future generations.

I urge the Partnership to incorporate accountability, benchmarks of success, and ample funding into this Agenda.

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-Expand the indicator species to include forage fish abundance and harbor seal toxics

loading; and

-Accelerate the restoration of the Elwha River.

Thank you for your hard work to develop a draft Action Agenda to restore, protect and recover Puget Sound to health by 2020.

On behalf of everything from eelgrass to orcas.

From: Colleen Berg

Comment: Dear Puget Sound Partnership,

I am writing to urge you to improve your action agenda's recommendations on pollution prevention.

Please acknowledge that the resident Orca whales, as the top mammal of the food chain in our community's waters and perhaps an indicator species, can not defend themselves from our society's thoughtless destruction of their home. We must adopt a more conscientious approach to protecting this environment NOW. Thank you for doing all that you can to make the Pacific Northwest a healthy place to live for all creatures.

From: Kimball Bergerud

Comment: Dear Puget Sound Partnership,

I am writing to urge you to improve your action agenda's recommendations on pollution prevention.

From: Richard Bergner

Comment: Dear Puget Sound Partnership,

Thank you for your hard work to develop a draft Action Agenda to restore, protect and recover Puget Sound to health by 2020. When it comes to restoring the health of the Puget Sound, where and how we grow matters. Especially in light of the one million new residents the state expects to welcome by 2020. It's more crucial than ever to focus that growth inside our urban areas so that we can preserve our farm and forest land and protect our rural areas to restore critical habitats and watersheds of the Sound.

While I applaud your effort thus far, the Action Agenda can and must go farther. We need a twenty year plan, not a two year plan. All the actions need to be tied together into a comprehensive plan with measurable benchmarks and timelines in order to achieve recovery

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by 2020.

As you finalize the final Action Agenda, please:

-Balance regulatory change with land acquisition to accomplish long term recovery goals;

-Take advantage of the region's recent vote to build 34 miles of new light rail - we must capitalize on this investment by requiring more intense development near these station areas that are pedestrian, bicycle and transit friendly;

-Identify adequate and sustained funding for the long haul;

-Clearly identify timelines and responsibilities;

-Be based on science;

-Set meaningful standards for habitat protection.

The Partnership staff, the Leadership Council, Ecosystem Coordinating Board, Science Panel and stakeholders throughout the Sound deserve praise for the monumental effort involved in producing the draft Action Agenda. The next step is secure much needed funding. The 2009 legislature must adopt new funding sources dedicated to the recovery of Puget Sound by 2020.

For Puget Sound!

From: Richard Bergner

Comment: Dear Puget Sound Partnership,

Thank you for your hard work to develop a draft Action Agenda to restore, protect and recover Puget Sound to health by 2020. It could not come at a more pressing time, especially for the Sound's iconic and endangered orca whale. Just this month, researchers reported seven orcas "10% of the Puget Sound population" are missing and believed to be dead. Some experts say dwindling populations of endangered Chinook salmon are at least partly to blame. Is this a sign that our ecosystem is on the verge of collapsing?

The urgency of restoring the Sound to health is at a tipping point and missing orcas are the Sound's "canaries in the coal mine," telling us we are running out of time. But there is hope for the orca, as there was hope for the bald eagle, the California Condor and others on the verge of extinction. The Puget Sound Partnership's Action Agenda is a golden opportunity to do what has not been done for over 20 years- develop and implement a recovery plan that is accountable, effective, transparent and decisive with sustained funding to restore this national treasure to health by 2020.

The draft Action Agenda includes many of the essential elements that need to be done:

-Require low-impact development to reduce stormwater pollution;

-Prohibit new bulkheads near feeder bluffs and forage fish spawning beaches;

-Fund local governments to develop and carry out shoreline master programs;

-Fund enforcement staff at state agencies and local governments;

-Implement specific, aggressive cleanup plans for polluted waters, including TMDLs;

-Fully fund a permanent year-round rescue tug at Neah Bay for oil spill prevention;

-Acquire critical intact parcels for habitat protection and conservation;

-Set strong requirements for water quantity, such as setting in-stream flow for all major rivers.

BUT, more than a list of Soundwide and Action Area-specific actions, the Partnership must create a real 2020 Action Agenda, not just a 2-year plan, that clearly identifies the specific actions that are needed over the next 12 years and the HOW and WHO and BY WHEN each action must be completed. All the actions need to be tied together into a comprehensive plan with measurable benchmarks and timelines in order to achieve recovery by 2020. The final Action Agenda must:

-Clearly identify timelines and responsibilities;

-Identify adequate and sustained funding for the long haul;

-Be a visionary and long term plan;

-Be based on science;

-Offer a comprehensive and robust program to prevent all sources of stormwater pollution, not just municipal stormwater;

-Strengthen the list of actions for toxic pollution prevention;

-Set meaningful standards for habitat protection;

-Balance regulatory change with land acquisition to accomplish long term recovery goals;

-Expand the indicator species to include more than just salmon, i.e. forage fish, harbor seals, etc.

The Partnership staff, the Leadership Council, Ecosystem Coordinating Board, Science Panel and stakeholders throughout the Sound deserve praise for the monumental effort involved in producing the draft Action Agenda. The next step is secure much needed funding. The 2009 legislature must adopt new funding sources dedicated to the recovery of Puget Sound by 2020.

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our sound, our community, our choice

From: Sharon Bergquist-Moody

Comment: Dear Puget Sound Partnership,

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The urgency of restoring the Sound to health is at a tipping point and missing orcas are the Sound's "canaries in the coal mine," telling us we are running out of time. But there is hope for the orca, as there was hope for the bald eagle, the California Condor and others on the verge of extinction. The Puget Sound Partnership's Action Agenda is a golden opportunity to do what has not been done for over 20 years- develop and implement a recovery plan that is accountable, effective, transparent and decisive with sustained funding to restore this national treasure to health by 2020.

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The Partnership staff, the Leadership Council, Ecosystem Coordinating Board, Science Panel and stakeholders throughout the Sound deserve praise for the monumental effort involved in producing the draft Action Agenda. The next step is secure much needed funding. The 2009 legislature must adopt new funding sources dedicated to the recovery of Puget Sound by 2020.

For Puget Sound!

From: Arno Bergstrom

Comment: I was one of the 1600 who attended many (6) public workshops incuding expert forums and action area meetings. I participated in a total 25 hours of PSP meetings which always included breakout sessions for increased participation.

I have read the draft plan and must take exception to one sentence in the draft under Question 3 - What actions should be taken that will move us from where we are today to a heathly Puget Sound by 2020? The second pharagraph for Question 3, Page 1 is as follows: "During the development of the Action Agenda, people commented that we already know what the problems are and that we should just get on with fixing them. Then citizens, government agencies, interest groups, and elected officials submitted over one thousand suggestions on what should be done, illustrating some of the difficulty in prioritizing actions for Puget Sound.

Most of the comments focused on a specific issue, project, or location; others described a myriad of issues that need to be addressed Sound-wide. Individually or in groups, people want to prevent oil spills, save orcas, restore their local creek, recover salmon, regulate geoduck production and harvest, increase recycling in the schools, build green, enforce existing laws, ban disposable water bottles and establish conservation reserves around Puget Sound, among a myriad of other actions. All of these actions are important, but provide little guidance on where to start and what would be the most effective use of resources." My sense is that most participants knew the issues and did ID issues for action because they are taking action on these issues at the local and regional level.

My problem is with the last sentence: "providing little guidance on where to start and what would be the most effective use of resources". This is only true because the hours of meeting

I attended did not proactively seek that guidance and resource recommendations. At virtually every PSP workshop/meeting I attended, audience members were ready and vocalizing actions. But because most of the action suggestions involved engaging and educating people who live, work and recreate on or near the Sound, the facilitators dismissed and or limited such discussions. Many participants repeatedly called for an education/engagement strategy...suggesting a forum to discuss engagement as a priority action agenda strategy. I understand that "communication, outreach and education" are included as bolded cluster of words at the end of Action Strategy E. Building and Implementing the New System, but it was not adequately vetted. I understand the dominant science focus to the planning process, but science alone will not change human behavior. On the science side of the action agenda, I commend those that sorted through huge volumes of data, research reports and expert testimony! The status and health sections are well written.

My frustration throughout the action agenda planning process is that the failing salmon populations, the loss of forests, and the declining ecosystem processes and functions of the Puget Sound are not the problem, rather it is human behavior, or more correctly a lack of stewardship ethic on the part of people that is problamatic. We need great science along with great public policy and a great education/engagement campaign to move us from where we are today to at healthy Puget Sound by 2020!

From: Marilyn Berko

Comment: Dear Puget Sound Partnership,

I am writing to urge you to improve your action agendas recommendations on pollution prevention. I am a physician who has lived in the Puget Sound area for nearly fifteen years. When I relocated here, I really believed I had come to God's country, and I still often feel that way. As a graduate student in zoology before I went to medical school, I spent a couple of summers at the Friday Harbor labs and used to go out to the Lime Kilm Lighthouse to watch the orcas swim by on a regular basis.

Sadly, the local orca population is diminishing, fish stocks in Puget Sound are contaminated with a variety of pollutants, and dead zones are increasing in size and frequency in Hood Canal. I have belonged to People for Puget Sound and the Washington Toxics Coolition for many years because these two organizations try to minimize the adverse environmental and health impacts of human activities through their advocacy . I am aware of the difficult and expensive efforts to clean up pollution in Commencement Bay, near the port of Seattle, and even in Budd Bay Inlet near where I live.

It is clear to me that it is much more difficult to attempt to remove harmful chemicals from the marine environment than to limit their use to begin with. I think most people in the Puget Sound area want to safeguard our precious environment and will do so whenever possible. But the use of herbicides, pesticides, household cleaners, and other products is usually done with little to no knowledge of the consequences of such chemicals on our rivers and streams and our marine environment. Individuals and businesses need ready access to information to make intelligent decisions to use isuch chemicals judiciously and to chose the safest option. Please strengthen your recommendations to include state funded research into the safety of

these chemicals and make such information widely available to businesses and the public so that we can save Puget Sound and reverse the recent environmental degradation.

Please strengthen your recommendations to provide more knowledge regarding product safety and to make this information more accessible to all.

From: M Berry

Comment: Dear Puget Sound Partnership,

Thank you for your commitment to developing an Action Agenda for a healthy Puget Sound. From struggling orcas to toxic chemicals in our water, the Sound needs quick and decisive action today. I want to make sure we pass a thriving Puget Sound on to future generations.

I urge the Partnership to incorporate accountability, benchmarks of success, and ample funding into this Agenda.

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-Expand the indicator species to include forage fish abundance and harbor seal toxics loading; and

-Accelerate the restoration of the Elwha River.

Thank you for your hard work to develop a draft Action Agenda to restore, protect and recover Puget Sound to health by 2020.

On behalf of everything from eelgrass to orcas.

From: Sheila Berry

Comment: Dear Puget Sound Partnership,

I am writing to urge you to improve your action agenda's recommendations on pollution prevention. I want a healthy Puget Sound to be part of the legacy we leave our children.

Many Washington manufacturers continue to use harmful chemicals without any plans to switch to chemicals that are safer for Puget Sound. To protect public health and the

environment, Washington's industry must begin phasing out of the worst toxic chemicals and developing plans to switch to safer alternatives.

Please include recommendations to help move Washington's businesses toward safer alternatives and away from chemicals known to be harmful to Puget Sound. These proposals should include

-Increasing the availability of technical assistance to help businesses reduce chemical use.

-Developing a state program to focus on researching safer chemicals and materials.

-Requiring better industry reporting to Ecology of the chemicals currently being used.

From: Lucille Bertuccio

Comment: Dear Puget Sound Partnership,

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Please include recommendations to help move Washington's businesses toward safer alternatives and away from chemicals known to be harmful to Puget Sound. These proposals should include

Increasing the availability of technical assistance to help businesses reduce chemical use.

Developing a state program to focus on researching safer chemicals and materials.

Requiring better industry reporting to Ecology of the chemicals currently being used.

From: Victoria Beschenbossel

Comment: Dear Puget Sound Partnership,

Thank you for tackling the enormous challenge of saving Puget Sound head on. We appreciate your boldness and your efforts to engage the broader community, to listen to us and to base your decisions on science.

Surfrider Foundation is committed to supporting your efforts, primarily by encouraging people to get out in the watershed and into the Sound, to enjoy it, to appreciate it and to take action to protect and restore it. Through projects like Rise Above Plastics, beach clean ups and ocean friendly gardens, we will do our best to promote Sound stewardship practices.

In order to make sure that we reach our goal of a healthy Puget Sound by 2020, we ask that

you strengthen the Action Agenda by incorporating the following recommendations:

- Be stronger on water quality measures.

Offer a comprehensive and robust program to prevent all sources of stormwater pollution, not just municipal stormwater.

Strengthen the list of actions for toxic pollution prevention.

- Expand the indicator species to include more than just salmon, i.e. forage fish and harbor seals.

- Be stronger on accountability by incorporating clear benchmarks to get us to a healthy Puget Sound by 2020.

- Identify adequate and sustained funding for the long haul.

- Increase the acreage of protected areas along the shoreline.

- Enhance the ability of all people to visit and connect with the shorelines and waters of greater Puget Sound.

Thank you for your hard work to develop a draft Action Agenda to restore, protect and recover Puget Sound to health by 2020. The next step is to get it funded, and the 2009 legislature must adopt new funding sources dedicated to the recovery of Puget Sound by 2020.

From: Heidi Betcher

Comment: Dear Puget Sound Partnership,

Thank you for considering this view point.

The Puget Sound Partnership's Action Agenda is a golden opportunity to do what has not been done for over 20 years- develop and implement a recovery plan that is accountable, effective, transparent and decisive with sustained funding to restore this national treasure to health by 2020.

From: Thomas Bettinger

Comment: Pls look at this company that provides solutions to some of our problems with water runoff into the sound.

http://www.abtechindustries.com/

From: Linda Bishop

Comment: We've been studying Puget Sound for twenty years and the Sound is still declining. It's time to act. Please, end the endless studies and form a viable action plan with accountability. We can't keep throwing money into studies and isolated projects, however valuable they may be. We need a unified plan, and we need it now.

From: Jennifer Black

Comment: Dear Puget Sound Partnership,

I am writing to urge you to improve your action agenda's recommendations on pollution prevention. Without life in the oceans there can be no life on land.

From: Elizabeth Blair

Comment: Dear Puget Sound Partnership,

The Partnership staff, the Leadership Council, Ecosystem Coordinating Board, Science Panel and stakeholders throughout the Sound deserve praise for the monumental effort involved in producing the draft Action Agenda. The next step is to finalize a plan that is accountable, transparent, effective and have dedicated new funding sources to the recovery of Puget Sound by 2020.

The Partnership must create a real 2020 Action Agenda, not just a 2-year plan that clearly identifies the specific actions that are needed over the next 12 years and the HOW and WHO and BY WHEN each action must be completed. All the actions need to be tied together into a comprehensive whole through measurable benchmarks that must be accomplished in order to achieve recovery by 2020.

Thank you for this opportunity to strengthen a strategy to save Puget Sound.

From: Brady Blake

Comment: In Table 2. "Seven Categories of Threats and Drivers for Puget Sound Ecosystems" in the Artificial Propagation category you state that there is an artificial propagation program in place for rebuilding Olympia oyster populations. No such program exists.

From: Seana Blake

Comment: Dear Puget Sound Partnership,

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action today. I want to make sure we pass a thriving Puget Sound on to future generations.

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-Accelerate the restoration of the Elwha River.

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On behalf of everything from eelgrass to orcas.

From: Mark Blitzer

Comment: Dear Puget Sound Partnership,

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Thank you for this opportunity to strengthen a strategy to save Puget Sound.

From: Gregg Blomberg

Comment: Dear Puget Sound Partnership,

I am writing to urge you to improve your action agenda's recommendations on pollution prevention.

Puget Sound is like a marine desert, closer to dead than alive.

We need a pull out the stops effort to begin to turn the condition of the sound around.

From: Kevin Bodle

Comment: Dear Puget Sound Partnership,

Please make a strong and workable agenda based on the whole ecosystem's future - which includes us. These decisions are our future. If we put the right steps in place, the land and water will tangibley give back. Unlike the "game" of money markets, our environment can sustain life if stewarded efficiently, with no self interests in mind. Please put your ethics first for the right plan!

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Thank you for this opportunity to strengthen a strategy to save Puget Sound.

From: Janet Boge

Comment: Dear Puget Sound Partnership,

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Sound's "canaries in the coal mine," telling us we are running out of time. But there is hope for the orca, as there was hope for the bald eagle, the California Condor and others on the verge of extinction. The Puget Sound Partnership's Action Agenda is a golden opportunity to do what has not been done for over 20 years- develop and implement a recovery plan that is accountable, effective, transparent and decisive with sustained funding to restore this national treasure to health by 2020.

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-Require low-impact development to reduce stormwater pollution;

-Prohibit new bulkheads near feeder bluffs and forage fish spawning beaches;

-Fund local governments to develop and carry out shoreline master programs;

-Fund enforcement staff at state agencies and local governments;

-Implement specific, aggressive cleanup plans for polluted waters, including TMDLs;

-Fully fund a permanent year-round rescue tug at Neah Bay for oil spill prevention;

-Acquire critical intact parcels for habitat protection and conservation;

-Set strong requirements for water quantity, such as setting in-stream flow for all major rivers.

BUT, more than a list of Soundwide and Action Area-specific actions, the Partnership must create a real 2020 Action Agenda, not just a 2-year plan, that clearly identifies the specific actions that are needed over the next 12 years and the HOW and WHO and BY WHEN each action must be completed. All the actions need to be tied together into a comprehensive plan with measurable benchmarks and timelines in order to achieve recovery by 2020. The final Action Agenda must:

-Clearly identify timelines and responsibilities;

-Identify adequate and sustained funding for the long haul;

-Be a visionary and long term plan;

-Be based on science;

-Offer a comprehensive and robust program to prevent all sources of stormwater pollution, not just municipal stormwater;

-Strengthen the list of actions for toxic pollution prevention;

-Set meaningful standards for habitat protection;

-Balance regulatory change with land acquisition to accomplish long term recovery goals;

-Expand the indicator species to include more than just salmon, i.e. forage fish, harbor seals,

etc.

The Partnership staff, the Leadership Council, Ecosystem Coordinating Board, Science Panel and stakeholders throughout the Sound deserve praise for the monumental effort involved in producing the draft Action Agenda. The next step is secure much needed funding. The 2009 legislature must adopt new funding sources dedicated to the recovery of Puget Sound by 2020.

For Puget Sound!

From: Marlen Boivin

Comment: Dear Puget Sound Partnership,

I am writing to urge you to improve your action agendas recommendations on pollution prevention.

From: Barb Bonner

Comment: Dear Puget Sound Partnership,

I am writing to urge you to improve your action agenda's recommendations on pollution prevention.....for the sake of our future.

From: Seth Book

Comment: Thank you for the opportunity to comment. first I believe the public should have had more than 2 weeks to review and comment on this draft document. My comments are found below

Introduction

Page 6 Fertilizers and Pesticides bullet 3 states "improve soil" I would suggest "improve soil tilth". Tilth refers to the health of the soil, and healthy soil is full of bugs, fungus, bacteria, air space and humus not just a sterile media.

Page 7 Septic Systems bullet 2 states, "Do not overuse or abuse its abilities (toilet paper only)". I would suggest deleting "(toilet paper only)" as it may be confusing.

Question 2 page 1 paragraph 2 states "...constructed ten major dams and thousands of small diversions and stream blockages, re-plumbed the Cedar River system..." My comment on this is I would like to include the North Fork Skokomish River diversion from Cushman dam #2 directly into the Hood Canal. The Cedar River estuary was moved but the entire North Fork of the Skokomish was pulled out of the native river channel and piped through turbines discharging to the Hood Canal causing much disturbance to the natural systems and functions.

Question 2 page 3 states Water Quality: Clean water is also critical for people and species.

Action Agenda measure: The Action Agenda measure is contaminant levels in herring, an important prey species for seals, salmon and other fish. The 2020 target is to reduce the toxic contamination of herring in central and southern Puget Sound to the lower levels seen in northern Puget Sound as an indication that we have controlled pollution sources. My comment on this paragraph is that toxics are only one water quality problem and should not be used as the only measure of controlled pollution. Fecal coliform or E. coli is an indicator of fecal pollution which is more of a problem in the Unindustrialzed Hood Canal.

From: Derek Booth

Comment: Dear PSP:

Thank you for your efforts in preparing the draft Action Plan. I appreciate the time that all of you have spent, not always to universal accolades, and I also thank you for the opportunity to provide formal comments.

My name is Derek Booth. I have a PhD in Geology from the University of Washington, and I am a licensed geologist and licensed civil engineer in the State of Washington. From 1985 until 2005 I worked for King County, primarily in the Basin Planning Program, and from 2005 through 2006 I was a professor at the University of Washington, with a joint appointment in the departments of geology and civil engineering, and adjunct appointments in the departments of urban planning, landscape architecture, and forestry. I was the director of the Center for Urban Water Resources Management and its successor, the Center for Water and Watershed Studies at the university. I have been the Senior Editor of the international scientific journal Quaternary Research since 2005, and I also now work for a private consulting firm, Stillwater Sciences. I have authored or co-authored 30 peer-reviewed scientific journal articles, 9 other peer-reviewed manuscripts, and 14 book chapters, almost all related to environmental features or water resources management of the greater Puget Sound region. I am also the author or coauthor of 26 geologic maps across western Washington, published by the US Geological Survey. I was a member of the recent National Academy of Sciences' committee on stormwater management in the United States. I was also on the Partnership's "Water Quality" topic forum, and a contributor to a pair of letters to the Partnership whose authorship is commonly referred to as the "gang of 14". I lived in the Puget Sound area for 27 years and raised two kids here.

I've sometimes been silent when input was requested. And sometimes I've spoken brashly when a little more tact would have been more appropriate, and perhaps more effective, as well. For such transgressions, especially, I apologize and hope that you are still willing to entertain a few more comments from me. I also hope they're of some assistance to you.

First, I compare the Action Agenda (let's just call it the AA for short) to the bullet points of the gang-of-14 letter of 9/25/08, and I feel like I can find every one of our main bullet points articulated. We didn't claim any great prescience, and the correspondence may just be coincidence or common sense independently striking twice in a 2-month period. For whatever reason, it leaves me feeling satisfied that the bones of this document offer a fine start.

I believe I've been quoted as saying that "the details are what is important." Having read the

AA in more detail than was the case on November 6th, I stand by that statement. I'd therefore like to focus the rest of these comments on such details, with no claim that they are either comprehensive in scope or representative of anything but my own interpretation of the document. I'm also going to focus on those details that I find troubling, rather than those that I find entirely acceptable. I apologize in advance for the seeming one-sided negativity of what follows; it's the only way that I can use what little time I have to greatest potential effectiveness (or so I imagine). If they simply drop me in the category of "troublemaker," then I've obviously judged wrong. Let's hope not....

I have two overarching concerns:

(1) there are an awful lot of actions that just entail "support"--one might imagine that almost all the tools are already in place to save the Sound. I don't think you mean that, and I do believe that we are currently utilizing only a fraction of the regulatory authority already available to effect genuine progress. The overall impression, however, is that not much new needs to be "done"--we just need to keep doing, only a little better. No, you don't SAY that, but please be sensitive to the overall impression being given. In some cases, I actually think this is not correct (and I'll get to those later), but for now I'd like you to think about the overall tone. This is not a "bold, action-oriented" manifesto. It's tone is almost complacent, in many sections.

(2) I count 16 mentions of the term "adaptive management," but not once do I see it defined, either formally or operationally. It's just something that everyone seems to know we need to "do". This absence worries me, because I'm left with the feeling that you really DON'T know what it is, or how to do it. It's hypothesis-driven monitoring, beginning with the explicit understanding that any management action in such a complex, ill-defined system is by definition an experiment and that the first action is NEVER going to be in exactly the right direction. With a clear hypothesis and a well-chosen set of attributes to monitor, however, you should be able to get feedback sufficiently promptly to maintain, accelerate, or adjust your management actions to improve outcomes.."on the fly," so to speak. I know that you and your Science Panel (SP, hereafter) were given such information on adaptive management programs (and even some specifics); where did it go?

So now, some picky stuff. I'm going to key these comments to the pdf page count (my version, downloaded from the web yesterday, has 94 pages in total--I hope you can track this):

P. 2 "the Partnership has, for the first time in Puget Sound, identified measurable indicators that can be monitored over time to assess progress" I know you have staff from the PSAT still working for you. Surely they get a little green around the gills, reading this...? I believe it is flat-out false, and that history shouldn't be rewritten to make a point. The rest of this page, however, is well stated.

P. 4 I really like the concept of a SP, but its current role is oversold. As I and many others have noted, the underlying expertise of the membership, although high, is not what would be expected of a technical guidance group for ecosystem restoration. This is no criticism of any individual--but they are in no position yet to "lead the charge," and it does a disservice to the existing expertise throughout the region to imply otherwise. The PSP process has done a good job of engaging that broader community, and you must continue to do so as the SP

grows into its role. It is (emphatically) not there yet, however, and stating otherwise does not make it so. Just tone down the rhetoric a hair, ok?

P 5. "refine nuances of the draft and prepare the final version" Well, I think this would benefit from a bit more than nuance refinement. I know the timeline is tight, but see what you can manage!

P. 9 "to identify specific outcomes—qualitative statements" I don't know if this is just quibbling with semantics, but "qualitative statements" (and you gotta admit, what follows is pretty vague) don't meet my definition of "specific outcomes." They may be the best you can manage right now; but if so, acknowledge that this is a charge from the legislature that is still on your to-do list.

P. 10 "Conducting these measurements systematically will ultimately identify trends that will tell us if we are making progress toward achieving our goals." I believe this is a great fallacy, and it harkens to my big point #2 (above). Monitoring is likely not to tell us anything, except to document failure after it's occurred, UNLESS it really is an element of a true adaptive management program. Just measuring stuff doesn't cut it--and if this doesn't make any sense to you, then my point is made more effectively than I could ever articulate. More likely, however, I bet you DO know what I mean, but you don't yet know how to do it. Fair enough! But admit it, somewhere.

I really don't like your provisional indicators. They're not tied to any hypotheses, they are unlikely to provide any early warning that actions are or are not being effective, and at least one (Land cover) applauds continued degradation (without offering any rationale, here or elsewhere, why that degradation is somehow "ok"). It also doesn't seem to recognize that not all imperviousness is equally "bad", and in so doing it imposes an unintended obstacle on other goals of the AA. You have staff who are bona fide experts in this topic; you don't need me to tell you this!

P. 11 "Measurable indicators and benchmarks are at the heart of the Partnership's adaptive management and accountability system" Sorry to be so repetitive, but just measuring something (even if you compare it to something else) is NOT an adaptive management program.

P. 23 I like all this stuff!

P. 24 "A watershed scale study of changes in land use patterns as related to the condition of aquatic habitat." It's unclear what this means, or what is being proposed that hasn't been done already. We know plenty about this topic, at least more than enough to make progress.

P. 24-26 A1 is a lot of studies and coordination and review; very little is "done" under this. See my big comment #1, above.

P. 28-29 Can any of the A3 "actions" be more specific? Concrete? They're pretty vague and loose…

P. 33 etc. I like the thrust--restore processes, not structure. But the specifics under B1 seem to be consistent only insofar as the advocated projects are "big," and the actions under B2 and B3 don't seem to speak to the preamble at all. What's the connection? Where's the

process restoration? What is going to end the cycle of funding sticks-in-cricks that don't actually accomplish very much??

P. 37 Similarly, the preamble for "C" is great. Someone has assembled the literature, thought about the problem, and produced a fine articulation of what needs doing. But….the specifics fall short. Read, for example, the list of "actions" under C1 on page 38. Really, what's being "done" except "advocating" and "promoting"? Have we really figured out all that's needed, and we just need to push on existing programs a little harder?

P. 40 C.2.1.1 "…and if appropriate and feasible…"? This is a very cautious preamble to a recommendation. What's "feasible"? Is a sick Puget Sound "feasible"? One would be forced to conclude that such a condition is at least up for debate. Note that the recent NRC report on Stormwater made watershed-level stormwater permitting the centerpiece of its recommendations. Nationwide, not just in the nation's most imperiled estuary. Why such caution? Who are you afraid of offending?

P. 40 C.2.2.1 Since the NPDES Phase I permits have already been found ineffective (and the Phase II permits likely to follow suit), what's a reader supposed to conclude when compliance with an existing sub-effective rule is the #1 recommendation of this section? My conclusion is that we're more concerned with filling out forms than actually achieving stated goals. Have you actually READ the Phase II permits? Can you tell me what they actually accomplish in the way of improving water quality???

P. 41 Near term actions--see previous comments on big issue #1. Too many studies and programs to qualify as a near-term attack on water-quality issues…

Throughout many of the "C" recommendations, I don't get any sense of priorities. Which are really important? Which are just good ideas? What's the linkage to either measured problems, or specific guidance from the SP or the topic forums to focus attention on the "most critical" issues? There's no obvious link to the science input; if it exists it should be more explicit.

P. 45 Priority D. This one is ripe for sniping, since it's all about "process" and very little about actually doing something. If you insist on making it one of 4 co-equal action areas, I would hope that you could justify why it ranks so highly. Again, it's an easy target so I think you must be doubly convincing that you're solving a real problem, and the result will somehow be a healthier Puget Sound because of it.

P. 47 D.1.6. seems circular. What is "consistency" with the AA? Ditto near-term action 1.

I'm finding myself with the same dis-ease throughout the "D" section. Why some actions and not others? What's guiding the priorities? What ARE the priorities? What's important and what's not, and why? It all seems so murky, and nothing is actually "done". I know this regulatory process stuff is important, but it's not very well supported or prioritized.

P. 56 "A management system inclusive of each of these elements will allow the Partnership to develop more strategic sets of actions. It will support robust adaptive management that will allow us to learn to work as a system as we grow and work to protect and restore Puget Sound." This reads like a strung-together list of jargon terms. I can't find anything substantive

behind these words anywhere in this section…and I think that's a problem. Don't you?

P. 57 E.1.1.2 "Continue to integrate the salmon recovery program elements into the broader ecosystem effort, including clarifying the role of the Salmon Recovery Council." What does this mean? What are you telling us you will "do"? It really sounds like business-as-usual.

P. 58 E1 near term actions are quite underwhelming.

P. 59 You may believe that AA priorities are obvious, but I can't figure them out for the life of me. Indeed, I think that's a big problem and it seems to point to how far behind the SP is in providing "science-based guidance". Didn't you get that from the topic forums? Didn't they offer any guidance on "this is the most important thing to do"? I'm not seeing that expressed throughout this document.

P. 61 16 "near-term actions"? This is not a good demonstration of focused attention!

P. 62 "The Partnership's Science Panel has prepared a draft Biennial Science Work Plan for 2009-11. This plan begins to layout out the components of long-term science strategy and describes priority analyses, data collection, and synthesis and integration efforts to be conducted to meet the needs of the Partnership." This is not an impressive accomplishment to show for the past 6+ months of effort. Doesn't it do anything more? If so, please tell us.

P. 63 E.3.1.3 Are you sure you want to say this? Sounds like you want to inject the SP into the operations of other agencies. That's unlikely to be welcomed!

P. 63 "E.3.2.2 Conduct focused scientific investigations to collect information about how the ecosystem functions and the effectiveness of management actions." Surely you can provide a little more of the specificity in the 2009-2011 work plan than is articulated here.

P. 64 E.3.4.4 and E.3.4.5 are potentially in conflict. I'm just a doubter, I know, but I bet that a true peer-review process will NOT, in every case, support the AA. You might assume that it will, but it never happens. Which would have priority???

P. 65 Near-term action #10. Surely you don't seriously believe that this is a "near term" activity? And, 22 such activities? You need to set priorities!!

So, you probably detect a theme. Too many little things, not enough big ones. Much talk, much less doing. Lots of stuff to tackle, but little guidance offered on how first to proceed…starting tomorrow. I respect that this is a draft, and that sometimes you just need to write all this stuff down on paper just to see what you have. Now that you've done that, however, I suggest that you don't need to write more, you need to write LESS. In particular, I'd start with your "near-term actions". If you can't accomplish them within, say, a year--it's NOT "near term" and it shouldn't be on the list. You shouldn't have more than a couple of such activities per topic. They should be weighted towards "doing" something, not advocating or supporting or coordinating something. And, you should ask yourself--"how is this different from what's happening right now already?" I'd argue that the state of the Sound is such that just doing-a-little-more is almost certainly a prescription for failure. If it's not "new", "different", and probably a little (or a lot) painful, it's probably not going to be enough to change the trajectory of decline.

Whether you mean it or not, the tone of this draft suggests that protecting the status quo is more important than doing whatever needs to be done. Please don't go down that path again--we already have one such document from last year where the scientists disowned the management plan (albeit relegated to an appendix). Set yourself a higher bar and show us what would really, truly, be needed to achieve it.

Next, look at the expositions of particular activities. How well do they relate to the philosophic preamble of each section? If you can't link the recommended action to its introduction (e.g., "we're doing such-and-such because it supports ecosystem process") then please omit it. I think the introductions are good and well-written. I think that some of the actions do not merit inclusion under them.

Hone down the current role of the Science Panel to match what you can actually present as their current products/contributions. Good intentions and future plans are great, but that shouldn't be the focus.

Find your documents about adaptive management and, somewhere in here, please include enough text to show that you know what it means, and how it fits in to the overall management approach. Just measuring indicators and comparing the results against benchmarks is not enough.

Good luck! Thanks for the chance to comment.

From: Harold Boswell

Comment: Dear Leadership Council,

Thank you for the opportunity to comment on the Puget Sound Partnership Draft Action Agenda. I appreciate the tremendous amount of work that has gone into developing it and I support the strong list of measures that, if implemented, will go a long way toward recovering Puget Sound by 2020.

The draft plan includes a few omissions. The final plan should include Outstanding Resource Water (ORW) designation under the Clean Water Act as a tool to help protect rivers and other aquatic habitat. While I strongly support the inclusion of Wild and Scenic designation as a similar tool, in some cases ORW designation will likely prove to be a better, more immediate way for the state to ensure the protection of high quality rivers and other waters. Therefore, I urge the Partnership to include support for the Outstanding Resource Water designation as one of its "Near Term Actions." ORW designations permanently protect high quality waters that are ecologically significant, provide cold water refuges for fish, and/or support important recreational values. Many rivers in the Puget Sound region are eligible for ORW designation.

I would also like to encourage you to include funds to move up the removal of the two dams on the Elwha from 2012 to 2010. Removal of the Elwha dams is one of the best chances for salmon and steelhead recovery in the region as it will open up over 70 miles of prime spawning habitat. Removing these dams has also been as a key action to recover our Puget

Sound's orca population, which is malnourished thanks to a lack of chinook salmon.

Especially during difficult financial times, finding opportunities for economic benefit and job creation is important. Removing the Elwha dams provides a tremendous opportunity for creating "green jobs" and numerous other economic benefits. Thank you for taking my comments into consideration.

From: Thomas Bougher

Comment: Dear Puget Sound Partnership,

Thank you for tackling the enormous challenge of saving Puget Sound head on. We appreciate your boldness and your efforts to engage the broader community, to listen to us and to base your decisions on science.

Surfrider Foundation is committed to supporting your efforts, primarily by encouraging people to get out in the watershed and into the Sound, to enjoy it, to appreciate it and to take action to protect and restore it. Through projects like Rise Above Plastics, beach clean ups and ocean friendly gardens, we will do our best to promote Sound stewardship practices.

In order to make sure that we reach our goal of a healthy Puget Sound by 2020, we ask that you strengthen the Action Agenda by incorporating the following recommendations:

- Be stronger on water quality measures by offering a comprehensive and robust program to prevent all sources of stormwater pollution and strengthening the list of actions for toxic pollution prevention.

- Develop different indicators for human well-being to include more opportunity for quality water-based recreation through increased shoreline access, clean beaches, and clean water.

- Be stronger on accountability by incorporating clear benchmarks to get us to a healthy Puget Sound by 2020.

- Create more opportunities and stronger protection programs to improve the public's interaction with the shoreline and achieve enough water quality improvement and habitat restoration to inspire the public to go to the water's edge more frequently.

- Ensure that there is enough funding for Puget Sound to achieve the goals laid out in this ambitious agenda.

Thank you for your hard work to develop a draft Action Agenda to restore, protect and recover Puget Sound to health by 2020.

From: Celia Bowker

Comment: Dear Puget Sound Partnership,

Thank you for your hard work to develop a draft Action Agenda to restore, protect and

recover Puget Sound to health by 2020. It could not come at a more pressing time, especially for the Sound's iconic and endangered orca whale. Just this month, researchers reported seven orcas "10% of the Puget Sound population" are missing and believed to be dead. Some experts say dwindling populations of endangered Chinook salmon are at least partly to blame. Is this a sign that our ecosystem is on the verge of collapsing?

The urgency of restoring the Sound to health is at a tipping point and missing orcas are the Sound's "canaries in the coal mine," telling us we are running out of time. But there is hope for the orca, as there was hope for the bald eagle, the California Condor and others on the verge of extinction. The Puget Sound Partnership's Action Agenda is a golden opportunity to do what has not been done for over 20 years- develop and implement a recovery plan that is accountable, effective, transparent and decisive with sustained funding to restore this national treasure to health by 2020.

The draft Action Agenda includes many of the essential elements that need to be done:

-Require low-impact development to reduce stormwater pollution;

-Prohibit new bulkheads near feeder bluffs and forage fish spawning beaches;

-Fund local governments to develop and carry out shoreline master programs;

-Fund enforcement staff at state agencies and local governments;

-Implement specific, aggressive cleanup plans for polluted waters, including TMDLs;

-Fully fund a permanent year-round rescue tug at Neah Bay for oil spill prevention;

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-Set strong requirements for water quantity, such as setting in-stream flow for all major rivers.

BUT, more than a list of Soundwide and Action Area-specific actions, the Partnership must create a real 2020 Action Agenda, not just a 2-year plan, that clearly identifies the specific actions that are needed over the next 12 years and the HOW and WHO and BY WHEN each action must be completed. All the actions need to be tied together into a comprehensive plan with measurable benchmarks and timelines in order to achieve recovery by 2020. The final Action Agenda must:

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-Expand the indicator species to include more than just salmon, i.e. forage fish, harbor seals, etc.

The Partnership staff, the Leadership Council, Ecosystem Coordinating Board, Science Panel and stakeholders throughout the Sound deserve praise for the monumental effort involved in producing the draft Action Agenda. The next step is secure much needed funding. The 2009 legislature must adopt new funding sources dedicated to the recovery of Puget Sound by 2020.

For Puget Sound!

From: Dave Boyd

Comment: Dear Puget Sound Partnership,

The Partnership staff, the Leadership Council, Ecosystem Coordinating Board, Science Panel and stakeholders throughout the Sound deserve praise for the monumental effort involved in producing the draft Action Agenda. The next step is to finalize a plan that is accountable, transparent, effective and have dedicated new funding sources to the recovery of Puget Sound by 2020.

The Partnership must create a real 2020 Action Agenda, not just a 2-year plan that clearly identifies the specific actions that are needed over the next 12 years and the HOW and WHO and BY WHEN each action must be completed. All the actions need to be tied together into a comprehensive whole through measurable benchmarks that must be accomplished in order to achieve recovery by 2020.

Thank you for this opportunity to strengthen a strategy to save Puget Sound.

From: Ronald Boyer

Comment: I could not find any reference to working with the Canadian (British Columbia)government in this document. I see a major shortcoming in excluding them from this plan. It should at least include plans to work diplomatically with them to encourage them to also take steps to improve the water quality of Puget Sound. A start could be to show our total displeasure in the lack of progress of eliminating the city of Victoria dumping their raw sewage directly into the Strait of Juan De Fuca.

From: Laura Leigh Brakke

Comment: Dear Puget Sound Partnership,

Thank you for your hard work to develop a draft Action Agenda to restore, protect and recover Puget Sound to health by 2020. It could not come at a more pressing time, especially for the Sound's iconic and endangered orca whale. Just this month, researchers reported seven orcas "10% of the Puget Sound population" are missing and believed to be dead. Some experts say dwindling populations of endangered Chinook salmon are at least partly to blame. Is this a sign that our ecosystem is on the verge of collapsing?

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For Puget Sound!

From: Harry Branch

Comment: Stormwater is certainly an issue but in Budd Inlet the most persistent and biologically damaging contamination comes from historic industrial activities and the pathway is groundwater, tidal intrusion and soil mobilization through development. Since we have contamination spread out over the benthic surface we can assume that these pathways have not been controlled. So source identification and control is a big issue that doesn't appear to have made it onto PSP's list of concerns. PSP is looking at saving the "best of the rest". What about the "worst of the rest"? Will degraded areas be abandoned in a financial crunch? Budd Inlet could easily fall into this category. Two things wrong with this: If we're concerned about loss of biological diversity we shouldn't be giving up on the most impacted stocks but rather doubling our efforts to save them; and all of Puget Sound is connected and we can't save bits and pieces here and there. We need low impact development and better control of growth boundaries.

From: Jill Brandenberger

Comment: Prioritizing focus areas is extremely difficult and I believe the PSP did an excellent job of establishing a matrix to begin this difficult task. In order to reach the broad audience of Puget Sound residents, one area I think the plan should spend a little more time developing is the progress to date.

Many environmental policies have been very effective at improving some various stresses to our ecosystem, for example, the Clean Water and Clean Air Act successfully reduced toxics loading from point sources and removed lead from gasoline while other land management

policies have generally improved land management strategies from the mid-1950s. Brandenberger et al. (2008a; b) illustrate a few examples of our successes and the new challenges for the 21st Century.

I believe it is important to show the public how effective historical regulations have been, but also highlight that regulations must continue to evolve with the ever changing anthropogenic stresses (i.e. new toxics such as PBDEs and greater dominance of diffuse sources to the overall toxic burden to Puget Sound).

On Page 2 in the Introduction the answer to Question 2 states anticipated population growth will amplify the current situation. In this case, it isn't just the population growth, but the type of population growth that will amplify the situation. The greater dependence on automobiles resulting from the "urban sprawl" type growth pattern has well documented impacts on ecosystem health. This is discussed later I Priority A, but I believe it should be stressed from the beginning.

On Page 3, the plan lists the provisional indicators for ecosystem health. The last indicator is toxics in pelagic fish and uses the status and trends of PBDEs in the environment as the indicator. While this is appropriate as an indicator for organic compounds that bioaccumulate in biota, I don't believe this is representative of all toxics in pelagic fish. The increased focus on PBDEs is certainly warranted, but sources of historical toxics, such as mercury, have not been addressed and continue to result in extremely high levels recorded in upper trophic level biota both within the sound and the world (including the remote Polar Regions). The sources, fate, and transport pathways for mercury and other toxic metals are not the same as for organic toxins. The PSP should not stress the use of only the new emerging contaminants as indicators of overall ecosystem health.

On Page 19 Priority C addresses stormwater discharges. A recent study from the ENVVEST program concluded that a majority of the annual loading of toxics occurs in subasins with a high percentage of total impervious area during the small precipitation events frequent from November through June in Puget Sound (Brandenberger et al. 2007). This suggests that enhanced efforts to reduce toxic loading from there small-scale storm events, could significant reduce the overall load of toxics. Stormwater treatment is much easier on such small storm events when flows are generally lower along with volumes. Therefore, the most cost effective approach to stormwater mitigation would be addressing the small storm events in highly urbanized areas.

The Priority C only touches on the need to reduce automobile usage and should incorporate better strategies to increase commuter transit or light rail and decrease the need for larger and wider highways to deal with increasing traffic volumes.

References:

Brandenberger, J. M., E. A. Crecelius and P. Louchouarn (2008). "Historical Inputs and Natural Recovery Rates of Heavy Metals and Organic Biomarkers in Puget Sound during the 20th Century." Environmental Science and Technology 42: 6786-6790.

Brandenberger, J.M., E.A. Crecelius, P. Louchouarn, S.R. Cooper, K. McDougall, E. Leopold, and G. Liu. (2008). Reconstructing trends in hypoxia using multiple paleoecological

indicators recorded in sediment cores from Puget Sound, WA. National Oceanic and Atmospheric Administration, Pacific Northwest National Laboratory Report No. PNWD-4013, 158pp.

Brandenberger, J. M., C. W. May, V. I. Cullinan, R. K. Johnston, D. E. Leisle, B. Beckwith, G. M. Sherrell, D. Metallo and R. Pingree (2007). Contaminant concentrations in storm water entering the Sinclair/Dyes Inlet subasin of the Puget Sound, USA, During storm event and baseflow conditions. 2007 Georgia Basin Puget Sound Research Conference. Vancouver, British Columbia.

From: Lynn Brevig

Comment: Dear Puget Sound Partnership,

Orcas and Chinook , Orcas and Chinook, Orcas and Chinook!! What else is there to say as these animals dwindle toward extinction.? Strong regulations now! on their behalf should be the #1 priority. That includes disallowing Glacier Corporation from expanding their mining operations on Vashon/Maury Island, now and Forever.

Our Orcas and Salmon and other marine species involved cannot take another blow large or small!

Please help us educate the public and I mean adults, the real problems!

The Partnership staff, the Leadership Council, Ecosystem Coordinating Board, Science Panel and stakeholders throughout the Sound deserve praise for the monumental effort involved in producing the draft Action Agenda. The next step is to finalize a plan that is accountable, transparent, effective and have dedicated new funding sources to the recovery of Puget Sound by 2020.

The Partnership must create a real 2020 Action Agenda, not just a 2-year plan that clearly identifies the specific actions that are needed over the next 12 years and the HOW and WHO and BY WHEN each action must be completed. All the actions need to be tied together into a comprehensive whole through measurable benchmarks that must be accomplished in order to achieve recovery by 2020.

Thank you for this opportunity to strengthen a strategy to save Puget Sound.

From: Julie Briselden

Comment: Dear Puget Sound Partnership,

The Partnership staff, the Leadership Council, Ecosystem Coordinating Board, Science Panel and stakeholders throughout the Sound deserve praise for the monumental effort involved in producing the draft Action Agenda. The next step is to finalize a plan that is accountable, transparent, effective and have dedicated new funding sources to the recovery of Puget Sound by 2020.

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Thank you for this opportunity to strengthen a strategy to save Puget Sound.

From: Hilary Bromberg

Comment: Dear Puget Sound Partnership,

I am writing to urge you to improve your action agendas recommendations on pollution prevention.

I'm really upset about the missing orcas and about the rest of the problems with Puget Sound.

Please take action! And help people to do the same!!

From: Lennon Bronsema

Comment: Dear Puget Sound Partnership,

Thank you for your hard work to develop a draft Action Agenda to restore, protect and recover Puget Sound to health by 2020. It could not come at a more pressing time, especially for the Sound's iconic and endangered orca whale. Just this month, researchers reported seven orcas "10% of the Puget Sound population" are missing and believed to be dead. Some experts say dwindling populations of endangered Chinook salmon are at least partly to blame. Is this a sign that our ecosystem is on the verge of collapsing?

The urgency of restoring the Sound to health is at a tipping point and missing orcas are the Sound's "canaries in the coal mine," telling us we are running out of time. But there is hope for the orca, as there was hope for the bald eagle, the California Condor and others on the verge of extinction. The Puget Sound Partnership's Action Agenda is a golden opportunity to do what has not been done for over 20 years- develop and implement a recovery plan that is accountable, effective, transparent and decisive with sustained funding to restore this national treasure to health by 2020.

The draft Action Agenda includes many of the essential elements that need to be done:

-Require low-impact development to reduce stormwater pollution;

-Prohibit new bulkheads near feeder bluffs and forage fish spawning beaches;

-Fund local governments to develop and carry out shoreline master programs;

-Fund enforcement staff at state agencies and local governments;

-Implement specific, aggressive cleanup plans for polluted waters, including TMDLs;

-Fully fund a permanent year-round rescue tug at Neah Bay for oil spill prevention;

-Acquire critical intact parcels for habitat protection and conservation;

-Set strong requirements for water quantity, such as setting in-stream flow for all major rivers.

BUT, more than a list of Soundwide and Action Area-specific actions, the Partnership must create a real 2020 Action Agenda, not just a 2-year plan, that clearly identifies the specific actions that are needed over the next 12 years and the HOW and WHO and BY WHEN each action must be completed. All the actions need to be tied together into a comprehensive plan with measurable benchmarks and timelines in order to achieve recovery by 2020. The final Action Agenda must:

-Clearly identify timelines and responsibilities;

-Identify adequate and sustained funding for the long haul;

-Be a visionary and long term plan;

-Be based on science;

-Offer a comprehensive and robust program to prevent all sources of stormwater pollution, not just municipal stormwater;

-Strengthen the list of actions for toxic pollution prevention;

-Set meaningful standards for habitat protection;

-Balance regulatory change with land acquisition to accomplish long term recovery goals;

-Expand the indicator species to include more than just salmon, i.e. forage fish, harbor seals, etc.

The Partnership staff, the Leadership Council, Ecosystem Coordinating Board, Science Panel and stakeholders throughout the Sound deserve praise for the monumental effort involved in producing the draft Action Agenda. The next step is secure much needed funding. The 2009 legislature must adopt new funding sources dedicated to the recovery of Puget Sound by 2020.

For Puget Sound!

PugetSoundPartnership
our Sound, our community, our chance

From: John Brooks

Comment: Dear Puget Sound Partnership,

Thank you for your commitment to developing an Action Agenda for a healthy Puget Sound. From struggling orcas to toxic chemicals in our water, the Sound needs quick and decisive action today. I want to make sure we pass a thriving Puget Sound on to future generations.

I urge the Partnership to incorporate accountability, benchmarks of success, and ample funding into this Agenda.

The draft Action Agenda includes many of the essential elements that need to be accomplished, but in addition, the final Action Agenda must also:

-Amend the Cruise Ship MOU to ban all cruise ship discharges in Puget Sound;

-Prioritize the protection and restoration of the State's forage fish spawning beds;

-Complete the Management Plan for the Cherry Point Aquatic Reserve;

-Identify adequate and sustained funding for Plan implementation;

-Update the guidance for open water dredge disposal of PCBs;

-Expand the indicator species to include forage fish abundance and harbor seal toxics loading; and

-Accelerate the restoration of the Elwha River.

Thank you for your hard work to develop a draft Action Agenda to restore, protect and recover Puget Sound to health by 2020.

On behalf of everything from eelgrass to orcas.

From: Shad Brooks

Comment: Dear Leadership Council,

Thank you for the opportunity to comment on the Puget Sound Partnership Draft Action Agenda. I appreciate the tremendous amount of work that has gone into developing it and I support the strong list of measures that, if implemented, will go a long way toward recovering Puget Sound by 2020.

The draft plan includes a few omissions. The final plan should include Outstanding Resource Water (ORW) designation under the Clean Water Act as a tool to help protect rivers and other aquatic habitat. While I strongly support the inclusion of Wild and Scenic designation as a similar tool, in some cases ORW designation will likely prove to be a better, more immediate way for the state to ensure the protection of high quality rivers and other waters. Therefore, I urge the Partnership to include support for the Outstanding Resource Water designation as one of its "Near Term Actions." ORW designations permanently protect high

quality waters that are ecologically significant, provide cold water refuges for fish, and/or support important recreational values. Many rivers in the Puget Sound region are eligible for ORW designation. I would also like to encourage you to include funds to move up the removal of the two dams on the Elwha from 2012 to 2010. Removal of the Elwha dams is one of the best chances for salmon and steelhead recovery in the region as it will open up over 70 miles of prime spawning habitat. Removing these dams has also been as a key action to recover our Puget Sound's orca population, which is malnourished thanks to a lack of chinook salmon.

Especially during difficult financial times, finding opportunities for economic benefit and job creation is important. Removing the Elwha dams provides a tremendous opportunity for creating "green jobs" and numerous other economic benefits.

Thank you for taking my comments into consideration.

From: Robin Brower

Comment: Dear Puget Sound Partnership,

Thank you for tackling the enormous challenge of saving Puget Sound head on. We appreciate your boldness and your efforts to engage the broader community, to listen to us and to base your decisions on science.

Surfrider Foundation is committed to supporting your efforts, primarily by encouraging people to get out in the watershed and into the Sound, to enjoy it, to appreciate it and to take action to protect and restore it. Through projects like Rise Above Plastics, beach clean ups and ocean friendly gardens, we will do our best to promote Sound stewardship practices.

In order to make sure that we reach our goal of a healthy Puget Sound by 2020, we ask that you strengthen the Action Agenda by incorporating the following recommendations:

- Be stronger on water quality measures by offering a comprehensive and robust program to prevent all sources of stormwater pollution and strengthening the list of actions for toxic pollution prevention.

- Develop different indicators for human well-being to include more opportunity for quality water-based recreation through increased shoreline access, clean beaches, and clean water.

- Be stronger on accountability by incorporating clear benchmarks to get us to a healthy Puget Sound by 2020.

- Create more opportunities and stronger protection programs to improve the public's interaction with the shoreline and achieve enough water quality improvement and habitat restoration to inspire the public to go to the water's edge more frequently.

- Ensure that there is enough funding for Puget Sound to achieve the goals laid out in this ambitious agenda.

Thank you for your hard work to develop a draft Action Agenda to restore, protect and

recover Puget Sound to health by 2020.

From: Robin Brower

Comment: Do something!!!

From: Steven Brown

Comment: Dear Puget Sound Partnership,

Thank you for your commitment to developing an Action Agenda for a healthy Puget Sound. From struggling orcas to toxic chemicals in our water, the Sound needs quick and decisive action today. I want to make sure we pass a thriving Puget Sound on to future generations.

As a resident of Vashon Island, I am well aware of the issues and the need to address them with resolve that is creative, credible, decisive and timely. I urge the Partnership to incorporate accountability, benchmarks of success, and ample funding into this Agenda.

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-Accelerate the restoration of the Elwha River.

Thank you for your hard work to develop a draft Action Agenda to restore, protect and recover Puget Sound to health by 2020.

On behalf of everything from eelgrass to orcas.

From: Ann Browning

Comment: Dear Puget Sound Partnership,

I am writing to urge you to improve your action agendas recommendations on pollution prevention.

From: Mary Bruce-Wright

Comment: Dear Puget Sound Partnership,

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On behalf of everything from eelgrass to orcas.

From: Tom Brush

Comment: Dear Puget Sound Partnership,

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Surfrider Foundation is committed to supporting your efforts, primarily by encouraging people to get out in the watershed and into the Sound, to enjoy it, to appreciate it and to take action to protect and restore it. Through projects like Rise Above Plastics, beach clean ups and ocean friendly gardens, we will do our best to promote Sound stewardship practices.

In order to make sure that we reach our goal of a healthy Puget Sound by 2020, we ask that you strengthen the Action Agenda by incorporating the following recommendations:

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- Create more opportunities and stronger protection programs to improve the public's interaction with the shoreline and achieve enough water quality improvement and habitat restoration to inspire the public to go to the water's edge more frequently.

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Thank you for your hard work to develop a draft Action Agenda to restore, protect and recover Puget Sound to health by 2020.

From: Kathryn Bubelis

Comment: Dear Puget Sound Partnership,

I am writing to urge you to improve your action agendas recommendations on pollution prevention.

Washington state spends tens of millions of dollars each year cleaning up pollution and billions of dollars each year in health care costs treating diseases linked to environmental pollutants. Yet, at the same time polluters continue to use toxic chemicals that contaminate Puget Sound and our bodies, without paying for the true cost of their pollution. It's time wildlife and taxpayers got off this toxic treadmill.

The current draft of the action plan does not include provisions that will help move Washington's businesses toward safer alternatives and away from chemicals known to be harmful. These proposals should include increasing the availability of technical assistance to help businesses reduce chemical use, developing a state program to focus on researching safer chemicals and materials, and requiring better industry reporting of the chemicals currently being used.

Please reconsider your action agenda's recommendations to include key actions that would

help reduce toxic pollution from industry around Puget Sound.

From: Julius Budos

Comment: 1) Question 1/p3 Having target values and benchmark values are good. But how do you know that the values for forest coverage and impervious surfaces given for Land cover are adequate?

2) Because orcas are at the top of the food chain in the Sound, it would seem a Provisional indicator for them is essential. If they cannot survive, then the Sound really isn't as healthy as it ought to be.

3) It would seem that the plan should address ensuring that the probability of an oil spill occurring in the Sound be made negligible through tough legislation and procedures, and if one does occur, then a mechanism to limit its destructive effects be well-defined and understood by all regions of the Sound. Because one massive spill could make all of this moot.

From: Scott Burbidge

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- Ensure that there is enough funding for Puget Sound to achieve the goals laid out in this ambitious agenda.

Thank you for your hard work to develop a draft Action Agenda to restore, protect and recover Puget Sound to health by 2020. I have lived in WA all my life and grew up on the puget sound in the Lakota Beach area in Federal Way. Not only is there a special place in my heart for the puget sound I kind of understand how important its waters are to us/the world. Keep up the good work and I am looking forward to seeing forward progress leading to keeping the sound clean!

From: Karolyn Burdick

Comment: Dear Puget Sound Partnership,

The Puget Sound Partnership must create a real 2020 Action Agenda, not just a 2-year plan. In spite of the financial crisis faced by Washington State and the federal government, decisive action involving local participation in decision making needs to take place, rather than a top-down imposition of vague directives. Political will is imperative to confront the entrenched opposition which can be expected. Monitoring will be essential to document real change.

Thank you for this opportunity to strengthen a strategy to save Puget Sound.

From: C Burkhead

Comment: Dear Puget Sound Partnership,

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-Update the guidance for open water dredge disposal of PCBs;

-Expand the indicator species to include forage fish abundance and harbor seal toxics

loading; and

-Accelerate the restoration of the Elwha River.

Thank you for your hard work to develop a draft Action Agenda to restore, protect and recover Puget Sound to health by 2020.

On behalf of everything from eelgrass to orcas.

From: R Burkhead

Comment: Dear Puget Sound Partnership,

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Thank you for your hard work to develop a draft Action Agenda to restore, protect and recover Puget Sound to health by 2020.

On behalf of everything from eelgrass to orcas.

From: Bob Burkle

Comment: Page 83, D1, #2 bullet "Develop and implement the Steelhead Recovery Plan..." WDFW has developed a statewide Steelhead Management Plan and is presently developing regional SMPs, one for the South Puget Sound Action Area is currently in progress. WDFW should be

included in the list of partners in this endeavor.

The indicators for Toxics in Pelagic Fish and Water Quality on question 1, page 3, are not "indicated" properly. Use the Water Quality indicator "PCBs and PBDEs in winter resident Chinook not higher than 20 and 10 ppb(wet weight), respectively" for the Toxics in Pelagic Fish indicator, as there are overwhelmingly other factors needed to recover Chinook, such as all the rest of the "H's" (habitat, harvest, and hatcheries mostly), whereas the measure of PCBs and PDPEs directly addresses the toxics problem. For water quality indicators, use the obvious, "A decrease and Eventual Elimination of Low Oxygen 'Dead Zones' in Hood Canal and South Puget Sound"

Question 3, Page 28, "Build and sustain long-term capacity of partners to effectively and efficiently implement the Action Agenda" is a good idea, but it is repeated twice on the page.

From: Gerald Burnett

Comment: Dear Puget Sound Partnership,

The Partnership staff, the Leadership Council, Ecosystem Coordinating Board, Science Panel and stakeholders throughout the Sound deserve praise for the monumental effort involved in producing the draft Action Agenda. The next step is to finalize a plan that is accountable, transparent, effective and have dedicated new funding sources to the recovery of Puget Sound by 2020.

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Thank you for this opportunity to strengthen a strategy to save Puget Sound.

I have lived in this area since 1968 and stongly endorse these proposals for the recovery of Puget Sound.

From: Sally Burtscher

Comment: I have read most of the action agenda and find something missing. this could be included in the general category of non-point pollutants or waste water treatment but i feel that it needs to be specifically noted somewhere in writing. That is: the ubiquitous 'feral pharmaceuticals' and the problems it causes in the invironment. the draft states no where that measures need to be taken to eliminate as much of these as possible, those just tossed or flushed. the agenda should included language to support state and federal reform in the disposition of unused meds. divertable meds. account for about 20 percent found in the environment. supporting "producer responsibility" legislation should be at the top of the list for some

pollutants (like unused meds)and the agenda does not specifically speak to this issue. i see the need to address 'feral pharmaceuticals' in the agenda and esp. encourage those counties abutting puget sound to be part of a push to raise awareness and establish proper disposal programs locally and to support any legislation toward that end. don't just lump this issue in the general category of waste treatment or run off. landfills, septic systems and ground water are affected. please add my comments to others you receive. i hope you will add langusge that i feel is missing.

From: Anna Butterfield

Comment: Dear Puget Sound Partnership,

The Partnership staff, the Leadership Council, Ecosystem Coordinating Board, Science Panel and stakeholders throughout the Sound deserve praise for the monumental effort involved in producing the draft Action Agenda. The next step is to finalize a plan that is accountable, transparent, effective and have dedicated new funding sources to the recovery of Puget Sound by 2020.

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Thank you for this opportunity to strengthen a strategy to save Puget Sound.

From: Christopher Cady

Comment: Fund Raising Car Washes. On any given sunny summer afternoon you can drive up and down kitsap or wheaton way and count probably not less than 10 car washes going on in random parking lots. Say each of those 10 fund raiser car washes wash only 10 cars. That is 100 cars worth of brake dust, dirt, grease, and oil being washed into the storm drains and puget sound on any given sunny summer day just in Bremerton. I know that these fund raiser are needed and supporting these kids and non-profit organizations is the right thing to do. My solution to this part of the problem is to "force" these car washes into professional car washes. Professional car washes pump out their bays and the waste is properly disposed of instead of it going into the storm drains and puget sound. It works and has been proven. I know because my mother owned 2 of the 3 car washes in my home town of Delta Colorado. She did it. The kids typically made more money and did a better job of getting the cars clean. It also saves water and helps the environment. I firmly beleive it it something that should be looked into and addressed here in the Puget Sound area. I am sure my mom and dad(Lorie and Pete Mosteller) would be more than happy to talk to the car wash owners up here and tell them how to make it a win/win situation for everybody. Right here in the Puget Sound area is Jerry Nix. He is the President of the Western Car Wash Asscioation. He is also the owner of Speedi Car wash in Tacoma. His contact information can be found by visting www.wcwa.org website. He is friends with my mom and can probably provide you with some

insight as to how my mom ran the car wash fund raisers from a professional car wash. Just some food for thought if you are truely interested in doing everything possible to clean up the pollution from storm drains into the pugets sound.

From: Robert Canamar

Comment: Puget Sound Partnership,

As a man who has his eye on the office of Mayor for Seattle, I support any and all efforts to clean up Puget Sound. Edmonds is a far way to go for a man in a wheelchair, so I would like to recommend that you do something in the Seattle area. Please let me know if there is anything that I can do to help in this enterprise.

From: Lesley Canfield

Comment: Dear Puget Sound Partnership,

The Partnership staff, the Leadership Council, Ecosystem Coordinating Board, Science Panel and stakeholders throughout the Sound deserve praise for the monumental effort involved in producing the draft Action Agenda. The next step is to finalize a plan that is accountable, transparent, effective and have dedicated new funding sources to the recovery of Puget Sound by 2020.

The Partnership must create a real 2020 Action Agenda, not just a 2-year plan that clearly identifies the specific actions that are needed over the next 12 years and the HOW and WHO and BY WHEN each action must be completed. All the actions need to be tied together into a comprehensive whole through measurable benchmarks that must be accomplished in order to achieve recovery by 2020.

Thank you for this opportunity to strengthen a strategy to save Puget Sound.

From: James Carlson

Comment: No cerebral individual would question this group's competence and abilities. Having written the above there are only a few who have lived here their entire life, as many of us. While I sometimes complain about rain,dark too early and so on,I feel blessed to have born, and educated (U of W 1970)in this magnificient area. What I don't see in this group is excellent representation of and for wild inland fish and especially Steelhead. When I was in scouting and until the late 70's to mid 80's. We could depend on fish being caught in Mountain Lakes and streams. My first Steelhead was on a fly rod, it was wild and went back in the stream. We also kept every plastic (hatchery) fish and took it home to smoke. Would you consider a rep from either Wild Steelhead Coalition or Wild Fish Conservancy. They are both science based and effective local organizations?

From: Ken Carrasco

Comment: Thank you for your commendable work in drafting this Action Agenda which is so critical to the health of our beautiful Puget Sound (including those waters in the Whatcom Area).

Although commenting as private citizens, we have several roles within our community. Ken has a graduate degree in marine biology (Dungeness crab biology, University of Washington) and is currently a member of the Board of Directors of the Nooksack Salmon Enhancement Association (NSEA) on which he chairs the Education Committee; is a member of the Whatcom County Marine Resources Committee (MRC) where he is chair of the Nearshore Subcommittee; and is the marine environmental protection officer in the Bellingham Coast Guard Auxiliary unit. He is a licensed charter-boat captain.

Mariann has over 30 years of experience as a professional wildlife biologist with the federal government and the private sector. She is the principal investigator for the Whatcom Marine Mammal Stranding Network and has a Letter Of Agreement (LOA) with NOAA Fisheries that permits her to respond to reports of marine mammals including endangered/threatened species; she is also a volunteer with the Northwest Wildlife Rehabilitation Center.

We own and operate a lodge (www.bluemouintainfarm.com) on 40 acres of land along the South Fork of the Nooksack River, 30 acres of which are now in a conservation easement, where environmental education and other courses can be held.

We have several comments:

1) A lengthier public comment period should have been offered, and your ostensible "bottom-up" approach is belied by the hastiness of the comment period. We have a child who was recently injured, and we were forced to literally read parts of the Action Agenda in the hospital because of your truncated comment period.

2) The importance of the nearshore in the Whatcom and San Juan Action Areas to salmonids (and other species) is critical.

a. Only reently has the importance of the nearshore to salmonids been recognized. Please continue to use the most updated scientific data to maximize the quality and availability of the nearshore to salmonids and supporting species.

b. Education of both adults and youth is pivotal so they can appreciate the value of what lies below the marine water's surface.

3) Similarly, the conservation of rockfish species should not be overlooked, which is very possible in the current "salmon-centric" atmosphere. Research, education, and protection of spawning areas should be an integral part of an ecosystem approach.

4) Alternative fuels, specifically biodiesel, should be encouraged. The replacement of highly toxic petroleum diesel in recreational powerboats by much more benign biodiesel would be beneficial to our nearshore (by the way, we use a biodiesel blend in our twin-engine Diesel powerboat). Infrastructure to support the use of biodiesel, such as tanks, fueling docks, and perhaps even subsidies, is highly recommended so a greater proportion of boaters would

use that fuel.

5) The impact of recreational boats on the ecosystem is substantial (and we say this as owners of a powerboat). Much more effective than environmental groups or governments, boater-to-boater education should be encouraged in the areas of clean refueling and other "green" boating practices and products (i.e., less harmful practices and products such as boat cleaners, antifouling paints, fueling techniques, anchoring techniques intended to preserve eelgrass beds, can and should be encouraged). Boating organizations such as the Coast Guard Auxiliary and the Power Squadron should be used for this education.

6) Marine mammal strandings occur with frequency along the marine shorelines of the Whatcom, San Juan, and Skagit Action Areas. Public education is critical, and provisions for the protection of both humans and animals should be provided. As a minimum, the Action Plan should acknowledge NOAA's responsiblities for the marine mammal stranding network and encourage the participation of local governments and involved citizens, as delegated by NOAA.

Again, thank you for this opportunity to respond.

From: Anne Caughlan

Comment: Dear Puget Sound Partnership,

I am writing to urge you to improve your action agendas recommendations on pollution prevention.

From: Georgina Cavendish

Comment: Dear Puget Sound Partnership,

The Partnership staff, the Leadership Council, Ecosystem Coordinating Board, Science Panel and stakeholders throughout the Sound deserve praise for the monumental effort involved in producing the draft Action Agenda. The next step is to finalize a plan that is accountable, transparent, effective and have dedicated new funding sources to the recovery of Puget Sound by 2020.

The Partnership must create a real 2020 Action Agenda, not just a 2-year plan that clearly identifies the specific actions that are needed over the next 12 years and the HOW and WHO and BY WHEN each action must be completed. All the actions need to be tied together into a comprehensive whole through measurable benchmarks that must be accomplished in order to achieve recovery by 2020.

Thank you for this opportunity to strengthen a strategy to save Puget Sound.

From: Loren Ceder

Comment: I am a 69 year old retiree writing because I want Puget Sound to recover to what I remember from my earlier life experiences. Except for 5 years in the Navy, I have spent my entire life in the Puget Sound basin. I have spent considerable time in the mountains and woods around Puget Sound, as well a boating on the Sound. I have a deep attachment to this area, its quality of life and opportunities for personal growth. To increase my understanding of ecological processes, I have taken courses in forestry, oceanography and fisheries at the University of Washington. I have done this for my personal enjoyment, as well as the knowledge to speak about problems we are facing. This area will continue to grow and this growth must be designed for minimal impact on resources, as well as a superior quality of life. The Puget Sound Partnership appears to be a positive approach to the problem.

After reading the Draft Action Agenda, I have some general comments. As a former small businessman, I have a pragmatic and somewhat skeptical view of new proposals. The action agenda lays out a vast number of proposals. It would be nice, if we could implement all of them. Of course, we cannot. A major limiting factor is funding. Are the people of the Puget Sound basin willing to obligate the billions of dollars required, considering the many other needs of the area? The public must be convinced that this is a wise use of resources. The "selling" of this proposal is critical. Does the public have the political will to proceed?

Another question is: are we willing to make the very difficult decisions that must be made? Are we willing to breach dikes to create more friendly habitat for salmon? Are we willing to give up our 5 acre minifarm for more dense living conditions? I have read about more dense "towns", but know nothing about how successful they are. How will we zone our land to accommodate another million+ people in the next 15-20 years? Again, the political will must be there to answer these and many other questions.

I have some specific comments. The draft states that "Puget Sound lost at least two-thirds of its remaining old growth forest". What definition of "old growth" was used to make this estimate? What has replaced this forest? Newer, managed forests can provide habitat and jobs for a timber industry. Unfortunately, the number of mills for cutting these logs is very small and logs may have to be hauled for long distances.

Mention is made of the forests ability to sequester carbon. Old growth forests have sequestered carbon, but the amount of new sequestration is open to question. Younger forests do sequester carbon, but there will come a time in the future when these trees will die or the lumber that comes from them is discarded. At this time, the carbon is returned to the atmosphere through decay. Forests provide little long term sequestration in relation to the magnitude of the carbon problem. This is not to say that we should ignore forests—every bit helps. However, the limits must be recognized.

The statement is made that harvest of trees may adversely affect the species that depend on them. With proper planning, cutting of trees can be done to enhance habitat. Dense forests can be opened to provide places for under story plants to grow. Large woody debris can be left or generated by leaving some trees on the ground. Such areas should be monitored to prevent invasive species from taking over the area.

From what I am learning in the fisheries class that I am taking, fisherman are making an effort to reduce by-catch. I am not familiar with current fishing regulations, but in the past, undersized fish or certain species had to be thrown back. I question the survival rate of such fish. In some countries, the first fish taken up to a limit must be kept. That helps eliminate returned fish that die.

I am curious to see how instream flows will be increased. I can understand less withdrawal, but do not understand how the affects of global warming will be mitigated. My feeling is that we are going to have to learn how to live with less plentiful water. I am also curious as to how No Discharge Zones would be enforced. Waste water from boat holding tanks is considered a problem, but I do not know how big a problem. Since everyone is affected by water quality, why not pay for pumping stations with public funds? Perhaps more boaters would pump at the stations, rather than in the Sound. Returning eel grass to historic levels is another question. Can this be done with 1/3 of our shore lines armored?

I must comment on the cost of stricter regulations for land use and development of property. Regulations are going to cost builders more and lots will be more expensive. If people want to live in a nice neighborhood, they should pay for it. However, I am very skeptical of the amount of money the builders are making. The seven million dollars the building association spent on the governors race makes me more skeptical. I think builders must absorb some of the increased costs.

There is much that is good in this agenda and I think it is a terrific start on turning around Puget Sound. I look forward to seeing more details on how this will be done and, particularly, how it will be financed.

From: Susan Chadd

Comment: Dear Puget Sound Partnership,

I am writing to urge you to improve your action agenda's recommendations on pollution prevention.

From: Susan Chadd

Comment: I have been spending time speaking with local officials and the building industry, and trying to see where the development and building industry can meet to achieve mutually satisfactory solutions to growth. I do not think the Growth Management Act, as it stands or local regulations can reach their stated goals of habitat retention and restoration, for the following reasons:

1. Significant amounts of property have grandfathered platted subdivisions

2. Local codes and regulations are convoluted and do not help their stated conservation planning goal (even after PSP assistance)

3. County codes do not provide incentives or help for developers to change their building patterns

4. No one is advocating for Transfer of Development Rights and there is low incentive in terms of zoning to make it a desirable alternative

5. Most jurisdictions do not have staff to effectively implement code enforcement

6. Developers are unfamiliar with better choices

7. The building industry will be resentful if they see this effort as pushing regulations on them and they will create pushback that will ultimately alter or block these efforts I advocate that PSP support a statewide effort to work with local governments to implement the recommendations of Randal Arendt in Growing Greener, Putting Conservation into Local Plans and Ordinances in the entire state.

The following is an outline of his recommendations. Growing Greener, Putting Conservation into Local Plans and Ordinances Author: Randal Arendt Control Planning Economic Benefits & Incentives for Builders and Developers Reduction of infrastructure, engineering and construction costs with

1. narrower lots

2. multiple unit dwellings

3. street and utility runs shortened

4. less expensive to create than golf-course communities

Streets not built to freeway standards - safer roads and proven safe for emergency access (p113)

Smoother plan review Social Benefits

Pedestrian friendly neighborhoods

Community activities

Community-wide greenways and trails

Balances the needs of elderly landowners who need to move from the land or heirs who will owe inheritance tax with preservation. The sellers receive full assessed value for the land and more land is preserved than in conventional developments. When desired, part of the land can remain in the family.

Economic and Social Benefits to County Citizens

A two pronged economic analysis:

Calculate the aggregate land value of dense clusters and much open space against the aggregate land value of current development patterns.

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Calculate the cost to the public of providing infrastructure to these two patterns.

Then combine these aggregate benefits and costs and calculate the winner.

You might also throw in that most gas purchases leave the county immediately. Therefore, to improve the county economy by increasing the amount of money kept in local circulation (buying local goods or goods sold by local stores), a plan that reduces the need for travel and for driving can benefit not only the future residents of developments but can benefit local business.

Land Trusts -If a land trust owns the conservation part of the property, they can offer relatively attractive low cost, long-term leases to cover property taxes

-Guidelines for Developers Working with the York Land Trust (p103)

Open space land can be owned by a Homeowners Association, with a Land Trust conservation easement

Land Trusts can prepare a model maintenance and operation plan for conservation developments

Developers should be furnished more information on setting up Land Trust conservation easements for conservation developments Homeowners Associations Open space land can be owned by a Homeowners Association, with a Land Trust conservation easement

Conservation zoning ordinances should include standards to guide applicants in the preparation of management plans for conservation lands in their subdivisions

Plans should establish management objectives, outline procedures and define responsibilities for maintaining the conservation areas

Land Trusts can prepare a model maintenance and operation plan for conservation developments

Developers should be furnished more information on setting up Homeowners Associations along with conservation development Design Principles

Developers want to maximize views outward from the house sites, and the public wants the development to be visually as inconspicuous as possible into and out from the site. It's often possible for a development to be sited or buffered that both are accommodated (p61)

Streets not built to freeway standards, update codes to ASCE rather than AASHTO standards PDRs and TDRs

TDRs have proven to be extremely difficult to implement and work best when sending districts are relatively modest in scale (20 acres or more per dwelling) so they will not overwhelm the receiving areas (i.e. controversy in Sequim)

TDRs must be combined with detailed design standards for the receiving districts

PDRs advantage is that they protect whole properties, however conservation development

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can protect interconnected networks of open space, while PDRs save isolated parcels

So PDRs and TDRs help as an added tool, but cannot be relied on for adequate protection of open space in the face of development pressure II. Tools Community Wide Map of Potential Conservation Lands Layer Base Map Streets and Parcel Boundaries

Identify potential greenway areas that don't consume more than 50% of the buildable area of any property

-Identify core greenway properties already protected or clearly excluded from future development Core Greenway Layer

2 - Lands That are Protected or Exempted

-Public land

-Private preserves

-Land trusts Layer

3 - Creeks, Floodplains, Wetlands

-All watercourses with their associated 100 year floodplain

-First order streams Layer

4 - Steep Slopes exceeding 25% Advisory Greenway - Second Priority Areas Layer

5 - Riparian Buffers

-Should extend at least 50 feet, preferably 100 feet from the top of each watercourse Layer

6 - Moderate Slopes and Shallow Bedrock - 15-25% slopes Layer

7 - Woodlands Layer

8 - Soils Rated as Prime or of Statewide Significance for Agriculture Advisory Greenway - Third Priority Areas Layer

9 - Other Farmland Layer

10 - Scenic Viewsheds & Scenic Road Corridors Layer

11 - Historic & Cultural Elements Zoning Ordinance Refinements

A1 Menu of Options Offering a Variety of Densities and Conservation Requirements(p144) 5 choices

-2 low density options

-1 density neutral option

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-2 higher density options

A2 Natural Features Conservation Standards

-Excludes environmentally sensitive lands from development activities

-Net outs which subtract constrained land from the acreage from which building density is calculated

A3 "Density Zoning or Performance Zoning"

-The permitted intensity of development directly relates to the ability of the site to safely accommodate it

-Must be combined with other land-use techniques encouraging conservation subdivision design A4 "Landowner Compacts"

-Voluntary agreement among two or more adjoining landowners to dissolve their common, internal lot lines and plan their separate, but contiguous landholdings in an integral, comprehensive manner.

-Areas for conservation and development could be located so they would produce the greatest benefit and landowners share the proceeds proportionately available

A5 Traditional Neighborhood Model

-Resources for zoning design standards

1. Visions of a New American Dream

2. Crossroad, Hamlet, Village Town Design Characteristics of Traditional Neighborhoods

A6 Transfer of Development Rights - TDR

-Mostly works only when sending districts have base densities of 20 or more acres per dwelling

-Has to be combined with detailed design standards on the receiving end

A7 Purchase of Development Rights - PDR

-Usually protects whole properties of isolated parcels, not interconnected networks of open space Subdivision Ordinance Refinements Should include the following six items:

1. Existing Resources / Site Analysis Map

-Zoning provisions updated to combine a density bonus for sensitive land conserving lay-outs to encourage this design approach in RCC and AR zones - Be great to find a successful example

-Density disincentives to discourage conventional land consuming layouts

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2. Pre-Sketch Conference and Site Visit

-Informal discussion with officials to discuss ideas

-If sate does not authorize sketch plans, strongly recommend it need to ask

3. Two-Stage Preliminary Plan

-1st - Conceptual

-2nd - Detailed

4. Conservation Subdivision Design

-Incentives and disincentives * Need to sell this to developers, builders, government with speakers who've done this

5. Four Step Approach to Designing Land Conserving Subdivisions

-Subdivision ordinances should be updated to explicitly describe the steps involved in designing conservation subdivisions

-The ordinance should include a provision requiring that all subdivisions contatining more than ___ lots must be prepared by a team including a landscape architect, engineer and surveyor

-Sequence of the four steps is critical

--Identification of conservation areas

--Locate house sites

--Align streets and trails

--Draw lot lines * In village or neighborhood, layouts reverse steps 2 and 3

Ideas for Presentations & Workshops to Development Community and Public Good graphics of examples of choices between conventional zoning and conservation development (Using photos of real Clallam developments and then have graphics showing how it would look if it had been designed as a conservation development) (make sure that examples shown are also financially advantageous) (Then having people vote their choice)

-A conservation development design team give a presentation on how they planned the development, how successful it was and the economics involved

-Speakers from counties that have succeeded in making the changes (p86)

- Highly recommends conserving wooded areas as a top priority

- Community workshop discussing the map of potential conservation lands and the open space preservation possible through conservation development planning

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- Developers who have successfully cooperated on developing contiguous properties

- Definitely need to address the financial advantages to current forest and farm landowners and heirs when they need to sell.

From: Kelley Chaddock

Comment: Dear Puget Sound Partnership,

The Partnership staff, the Leadership Council, Ecosystem Coordinating Board, Science Panel and stakeholders throughout the Sound deserve praise for the monumental effort involved in producing the draft Action Agenda. The next step is to finalize a plan that is accountable, transparent, effective and have dedicated new funding sources to the recovery of Puget Sound by 2020.

The Partnership must create a real 2020 Action Agenda, not just a 2-year plan that clearly identifies the specific actions that are needed over the next 12 years and the HOW and WHO and BY WHEN each action must be completed. All the actions need to be tied together into a comprehensive whole through measurable benchmarks that must be accomplished in order to achieve recovery by 2020.

Thank you for this opportunity to strengthen a strategy to save Puget Sound.

From: John Chaney

Comment: I have followed this issue and reviewed the Action Agenda comments of the King County Agriculture and Forest Commissions, and the Snoqualmie Watershed Forum. I affirm my support for their comments.

I appreciate the PSP's recognition in the Action Agenda that forestland and healthy farms are crucial to PSP's strategic priorities: protecting and restoring ecosystem processes, and reducing sources of water pollution.

-The development of conservation, education and incentive programs to preserve and improve the health of our forest and farmlands is essential to achieving meaningful improvement.

-A further challenge to supporting healthy forested watersheds and local food supply is climate change. Current climate change risk reduction science calls for more active management of our forested landscapes, including beginning to actively manage our parks and conservation areas so that they might be supported through the changes that will be too rapid for normal forest processes to respond to.

- The final challenge to conserving forestland and farmland is the rapidly changing ownership; ever-smaller ownership size and conversion of lands to non-resource based uses.

Given these three issues in particular (recognition of the value of forests and farmland in

stormwater mitigation, the challenge of conserving forests and farms through climate change, and rapidly changing ownership and conversion), I feel that PSP action items supporting landowner technical and educational support and incentives need to be more specific and include funding strategies.

Landowner incentives and the acquisition of development rights are crucial to both the improvement of natural resource protection and to the long-term viability of farming and forestry around the densely populated Puget Sound region. However, in terms of both resource management and the economic viability of forestry and agriculture, there appears to be an over-reliance on them in the draft strategy. I would give as much, if not more weight to:

-Local, state and federal land use and building regulations that are friendly for active agriculture and forestry (as opposed to rural residential land use regulations that either hinder farming or forestry or lead to lack of regulatory compliance)

-Technical assistance to land managers - especially to forest landowners – many of whom inherit forest or farm lands adjacent to their homes but have no prior experience with forestry or farming, or how to meet regulatory requirements. This assistance should be offered at the local level. Landowner incentives alone do not preclude owners of these properties from taking the "estate" option of relatively passive land management.

While this option may appear ecologically appropriate, unmanaged farm and forest lands are often not a healthy ecological option and threaten the viability of adjacent forestry or farming: invasive species and other pests, fire danger in forest lands, flooding of adjacent farmlands. King County currently has successful forestry technical assistance and farm assistance programs. Fund and promote to other areas.

Under Priority D, another model for "centers of excellence" is a new King County program, HIGHLY FOCUSED STEWARDSHIP ASSISTANCE IN THE SNOQUALMIE: A MODEL FOR RURAL WATERSHEDS, funded through an EPA grant. This is a two and a half-year project creating a highly focused stewardship program in two Snoqualmie subbasins at risk of development-related impacts. Private landowners will receive customized education, technical assistance, and incentives to retain forest cover, minimize development footprints, implement Low Impact Development and other best management practices, and restore or enhance portions of their properties. The approach will be personal, one-on-one, and highly responsive to individual landowner needs. The intent is to create a "critical mass" of contiguous protected and/or restored private lands along ecologically important stream reaches through collaboration between community groups, stewardship groups and King County. The grant will evaluate the effectiveness of this approach compared to traditional non-focused approaches where stewardship programs respond to landowner requests, but without coordinated outreach among multiple programs and strong sponsorship by the local community. Evaluation of the effectiveness of this focused approach will lead to development of an improved stewardship assistance model that can be adapted to other watersheds. This project could be called out in the PSP as a strong model as a center of excellence that, if successful, would be replicated throughout Puget Sound.

From: Lois Charles

Comment: Dear Puget Sound Partnership,

I am writing to urge you to improve your action agendas recommendations on pollution prevention.

From: Joe Chasse

Comment: Dear Puget Sound Partnership,

Thank you for your commitment to developing an Action Agenda for a healthy Puget Sound. From struggling orcas to toxic chemicals in our water, the Sound needs quick and decisive action today. I want to make sure we pass a thriving Puget Sound on to future generations.

I urge the Partnership to incorporate accountability, benchmarks of success, and ample funding into this Agenda.

The draft Action Agenda includes many of the essential elements that need to be accomplished, but in addition, the final Action Agenda must also:

-Amend the Cruise Ship MOU to ban all cruise ship discharges in Puget Sound;

-Prioritize the protection and restoration of the State's forage fish spawning beds;

-Complete the Management Plan for the Cherry Point Aquatic Reserve;

-Identify adequate and sustained funding for Plan implementation;

-Update the guidance for open water dredge disposal of PCBs;

-Expand the indicator species to include forage fish abundance and harbor seal toxics loading; and

-Accelerate the restoration of the Elwha River.

Thank you for your hard work to develop a draft Action Agenda to restore, protect and recover Puget Sound to health by 2020.

On behalf of everything from eelgrass to orcas.

From: Lela Chavez

Comment: Dear Puget Sound Partnership,

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The Partnership must create a real 2020 Action Agenda, not just a 2-year plan that clearly identifies the specific actions that are needed over the next 12 years and the HOW and WHO and BY WHEN each action must be completed. All the actions need to be tied together into a comprehensive whole through measurable benchmarks that must be accomplished in order to achieve recovery by 2020.

Thank you for this opportunity to strengthen a strategy to save Puget Sound.

From: Owen Cheevers

Comment: Dear Puget Sound Partnership,

I am writing to urge you to improve your action agenda's recommendations on pollution prevention.

From: Sarah Chessman

Comment: Dear Puget Sound Partnership,

I am writing to urge you to improve your action agendas recommendations on pollution prevention.

From: Susan Chiat

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Thank you for this opportunity to strengthen a strategy to save Puget Sound.

From: Neil Chrisman

Comment: First and foremost I would like to publicly thank all the people and agencies involved in preparing this 2020 Action Agenda for Puget Sound Recovery (hereafter referred to as the Agenda). I particularly want to recognize the role of Gov. Christine Gregoire and Bill Ruckleshaus in forming the Puget Sound Partnership and mandating that preliminary work be done to create this new agency charged with the vital work of protecting and restoring our essential watersheds that supply Puget Sound as well as the Sound itself. The importance of a healthy ecosystem cannot be overstated in a region so dependent upon it for our quality of life issues for all of the human activities and biologically diverse life forms that depend on Puget Sound for their continued existence.

I encourage all the participants: agencies; businesses; volunteers; scientists; employers; employees; educators; elected or appointed government representatives to approve the Agenda and to work diligently to implement it as quickly and forcefully as possible. I fear there will be tremendous pressures to delay and postpone the meaningful significant expenditures necessary to fulfill the Agenda. I fear the resistance to change the status quo, where people, politicians and business interests will not acknowledge the necessity of implementing the Agenda as it pertains to their current activities and future plans.

The Agenda will require funding now and into the future at the same time as people will argue that we cannot afford it now, in these tough, uncertain economic times with the State of Washington facing an even larger deficit forecast calling for across the board cuts in all government programs and agencies. I would argue it has never been more important than to act now: to stop the degradation of the ecosystem; to lessen the pollution flowing into the Sound; to restore the habitat required by salmon and whales and eagles to name but a few of the life forms dependent on a healthy Puget Sound. We will always face uncertain times and unknown problems will appear inconveniently to sabotage our best efforts, but we must take the actions deemed necessary by our best scientists to avert a true calamity.

What will we be leaving for our children's children? Will there still be fishes swimming in Hood's Canal? Will Orca whales be endangered or extinct? Will we be able to proudly say that we saved the native Chinook salmon from extinction? Will the only salmon available for us to eat be farm-raised Atlantic salmon with artificially added color enhancers and antibiotics included? (Will scientist's reveal to us the true costs associated with fish farms? Can we actually fool ourselves into believing that a farm-raised, or even a fish-hatchery raised salmon is the same as a native salmon?)

At what cost do we destroy the environment for species dependent upon it? What prices are we willing to pay in the future for the opportunities we are unwilling to pay for today? We still have it within our grasp to save numerous species from extinction. Let us not miss the opportunity. We save our selves along with the Puget Sound.

From: Kimberly Christensen

Comment: Dear Puget Sound Partnership,

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Thank you for this opportunity to strengthen a strategy to save Puget Sound.

From: Julie Christoph

Comment: Dear Puget Sound Partnership,

Thank you for tackling the enormous challenge of saving Puget Sound head on. We appreciate your boldness and your efforts to engage the broader community, to listen to us and to base your decisions on science.

Surfrider Foundation is committed to supporting your efforts, primarily by encouraging people to get out in the watershed and into the Sound, to enjoy it, to appreciate it and to take action to protect and restore it. Through projects like Rise Above Plastics, beach clean ups and ocean friendly gardens, we will do our best to promote Sound stewardship practices.

In order to make sure that we reach our goal of a healthy Puget Sound by 2020, we ask that you strengthen the Action Agenda by incorporating the following recommendations:

- Be stronger on water quality measures by offering a comprehensive and robust program to prevent all sources of stormwater pollution and strengthening the list of actions for toxic pollution prevention.

- Develop different indicators for human well-being to include more opportunity for quality water-based recreation through increased shoreline access, clean beaches, and clean water.

- Be stronger on accountability by incorporating clear benchmarks to get us to a healthy Puget Sound by 2020.

- Create more opportunities and stronger protection programs to improve the public's interaction with the shoreline and achieve enough water quality improvement and habitat restoration to inspire the public to go to the water's edge more frequently.

- Ensure that there is enough funding for Puget Sound to achieve the goals laid out in this

ambitious agenda.

Thank you for your hard work to develop a draft Action Agenda to restore, protect and recover Puget Sound to health by 2020.

From: Benjamin Cody

Comment: Dear Leadership Council,

Thank you for the opportunity to comment on the Puget Sound Partnership Draft Action Agenda. I appreciate the tremendous amount of work that has gone into developing it and I support the strong list of measures that, if implemented, will go a long way toward recovering Puget Sound by 2020.

The draft plan includes a few omissions. The final plan should include Outstanding Resource Water (ORW) designation under the Clean Water Act as a tool to help protect rivers and other aquatic habitat. While I strongly support the inclusion of Wild and Scenic designation as a similar tool, in some cases ORW designation will likely prove to be a better, more immediate way for the state to ensure the protection of high quality rivers and other waters. Therefore, I urge the Partnership to include support for the Outstanding Resource Water designation as one of its "Near Term Actions." ORW designations permanently protect high quality waters that are ecologically significant, provide cold water refuges for fish, and/or support important recreational values. Many rivers in the Puget Sound region are eligible for ORW designation. I would also like to encourage you to include funds to move up the removal of the two dams on the Elwha from 2012 to 2010. Removal of the Elwha dams is one of the best chances for salmon and steelhead recovery in the region as it will open up over 70 miles of prime spawning habitat. Removing these dams has also been as a key action to recover our Puget Sound's orca population, which is malnourished thanks to a lack of chinook salmon.

Especially during difficult financial times, finding opportunities for economic benefit and job creation is important. Removing the Elwha dams provides a tremendous opportunity for creating "green jobs" and numerous other economic benefits.

Thank you for taking my comments into consideration.

From: Lori Coletti

Comment: Dear Puget Sound Partnership,

Thank you for your commitment to developing an Action Agenda for a healthy Puget Sound. From struggling orcas to toxic chemicals in our water, the Sound needs quick and decisive action today. I want to make sure we pass a thriving Puget Sound on to future generations.

I urge the Partnership to incorporate accountability, benchmarks of success, and ample funding into this Agenda.

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-Identify adequate and sustained funding for Plan implementation;

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-Accelerate the restoration of the Elwha River.

Thank you for your hard work to develop a draft Action Agenda to restore, protect and recover Puget Sound to health by 2020.

On behalf of everything from eelgrass to orcas.

From: William Collins

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interaction with the shoreline and achieve enough water quality improvement and habitat restoration to inspire the public to go to the water's edge more frequently.

- Ensure that there is enough funding for Puget Sound to achieve the goals laid out in this ambitious agenda.

Thank you for your hard work to develop a draft Action Agenda to restore, protect and recover Puget Sound to health by 2020.

Whatever the fiscal challenges are today, they pale in comparison to the cost of allowing Puget Sound to continue to

detoriate- not only in lost financial opportunities for the future, but, more importantly, in lost species and destroyed habitat. You can't put a price tag on what is both irreplacable AND priceless. Please act now to protect and restore this precious gift...we simply can't afford not to.

From: Stephanie Colony

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Thank you for your commitment to developing an Action Agenda for a healthy Puget Sound. From struggling orcas to toxic chemicals in our water, the Sound needs quick and decisive action today. I want to make sure we pass a thriving Puget Sound on to future generations.

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The draft Action Agenda includes many of the essential elements that need to be accomplished, but in addition, the final Action Agenda must also:

-Amend the Cruise Ship MOU to ban all cruise ship discharges in Puget Sound;

-Prioritize the protection and restoration of the State's forage fish spawning beds;

-Complete the Management Plan for the Cherry Point Aquatic Reserve;

-Identify adequate and sustained funding for Plan implementation;

-Update the guidance for open water dredge disposal of PCBs;

-Expand the indicator species to include forage fish abundance and harbor seal toxics loading; and

-Accelerate the restoration of the Elwha River.

Thank you for your hard work to develop a draft Action Agenda to restore, protect and recover Puget Sound to health by 2020.

On behalf of everything from eelgrass to orcas.

From: Jeff Compton

Comment: Thank you for your efforts to meet the charge of the Governor and Legislature and develop a roadmap for recovering Puget Sound. I wish to convey my support, and stress that, as a resident of the Puget Sound area, I hope the state and federal governments will take this effort seriously. We must take meaningful steps right away to begin the recovery process. I recognize that your work to convene many parties and coalesce lots of information is complex and time-consuming. More research certainly is needed to inform Puget Sound preservation. And while I expect the Action Agenda to morph and improve over time, I recognize that it isn't likely to be perfect in anyone's eyes. As you move forward and have to chose a balance, I urge you to be swayed by experienced advocates and academics and sound your trumpet for what will be needed to responsibly recover the Sound - rather than continue our tradition of "compromise" that results in delays and a slow decline in Puget Sound health. It is time to turn things around in Puget Sound. I support a bold vision and decisive action, with accountability and priority funding. Let us seize the opportunity to take strong steps right away. And let us keep the Sound in the spotlight, steadily and confidently working for its sustainable health.

From: Mike Conlan

Comment: Dear Puget Sound Partnership,

I am writing to urge you to improve your action agendas recommendations on pollution prevention.

From: Patricia Connell

Comment: I have lived in the area only 2 years and am very cognizant of the need to protect the Puget Sound Area. I do all I can personally, not use toxic fertilizers, use electronic mowing equipment, garden organically, pick up dog poop, etc. However we need a plan in place to clean up what is damaged already and preserve what is not for future generations.

From: Rebecca Connors

Comment: Dear Puget Sound Partnership,,

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On behalf of everything from eelgrass to orcas.

From: Jennifer Cordsen

Comment: Dear Puget Sound Partnership,

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On behalf of everything from eelgrass to orcas.

From: Tamara Cowles

Comment: I would like to see three issues addressed that affect our waterways, fertilizing yards, septic systems and county enforcement of the Shoreline Management Act. I live on Cranberry Creek at Lake Limerick outside of Shelton. Two years ago the property next to me was illegally logged down to the creek (salmon run this creek). I fought with the county to enforce the law with on this property. The Department of Ecology came out several times and contacted the county, but the county still ignored the problem. The owner refused to obey the law and the creek paid for it. He is finally in complaince after a almost a year of badgering the county. I would like to see all counties that are in control of enforcing these laws make sure that they employees are trained in the laws. I would also like to see more education for the public of what makes our waterways healthy. Most people don't even realize the need for clean water or what clean water really is. Thank you

From: Allen Cox

Comment: Dear Leadership Council,

Thank you for the opportunity to comment on the Puget Sound Partnership Draft Action Agenda. I appreciate the tremendous amount of work that has gone into developing it and I support the strong list of measures that, if implemented, will go a long way toward recovering Puget Sound by 2020.

The draft plan includes a few omissions. The final plan should include Outstanding Resource Water (ORW) designation under the Clean Water Act as a tool to help protect rivers and other aquatic habitat. While I strongly support the inclusion of Wild and Scenic designation as a similar tool, in some cases ORW designation will likely prove to be a better, more immediate way for the state to ensure the protection of high quality rivers and other waters. Therefore, I urge the Partnership to include support for the Outstanding Resource Water designation as one of its "Near Term Actions." ORW designations permanently protect high quality waters that are ecologically significant, provide cold water refuges for fish, and/or support important recreational values. Many rivers in the Puget Sound region are eligible for ORW designation. I would also like to encourage you to include funds to move up the removal of the two dams on the Elwha from 2012 to 2010. Removal of the Elwha dams is one of the best chances for salmon and steelhead recovery in the region as it will open up over 70 miles of prime spawning habitat. Removing these dams has also been as a key action to recover our Puget Sound's orca population, which is malnourished thanks to a lack of chinook salmon.

Especially during difficult financial times, finding opportunities for economic benefit and job creation is important. Removing the Elwha dams provides a tremendous opportunity for

creating "green jobs" and numerous other economic benefits.

Thank you for taking my comments into consideration.

From: Emily Crandall

Comment: Dear Puget Sound Partnership,

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On behalf of everything from eelgrass to orcas.

From: Al Craney

Comment: I strongly support the Action Items A.4.4. Skagit County is 67% forests. Our forest store 8 to 10 metric tons of C02 per acre per year, (source: Department of Forestry and Natural Resources, Purdue University,Extension Bulletin FNR-228-W, 2008). Puget Sound will NOT recover without our forest lands. Thank You.

PugetSoundPartnership
our sound, our community, our challenge

From: Amanda Creager

Comment: Dear Leadership Council,

Thank you for the opportunity to comment on the Puget Sound Partnership Draft Action Agenda. I appreciate the tremendous amount of work that has gone into developing it and I support the strong list of measures that, if implemented, will go a long way toward recovering Puget Sound by 2020.

The draft plan includes a few omissions. The final plan should include Outstanding Resource Water (ORW) designation under the Clean Water Act as a tool to help protect rivers and other aquatic habitat. While I strongly support the inclusion of Wild and Scenic designation as a similar tool, in some cases ORW designation will likely prove to be a better, more immediate way for the state to ensure the protection of high quality rivers and other waters. Therefore, I urge the Partnership to include support for the Outstanding Resource Water designation as one of its "Near Term Actions." ORW designations permanently protect high quality waters that are ecologically significant, provide cold water refuges for fish, and/or support important recreational values. Many rivers in the Puget Sound region are eligible for ORW designation.

I would also like to encourage you to include funds to move up the removal of the two dams on the Elwha from 2012 to 2010. Removal of the Elwha dams is one of the best chances for salmon and steelhead recovery in the region as it will open up over 70 miles of prime spawning habitat. Removing these dams has also been as a key action to recover our Puget Sound's orca population, which is malnourished thanks to a lack of chinook salmon.

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and numerous other economic benefits.

Thank you for taking my comments into consideration.

From: Cynthia Creel

Comment: Dear Puget Sound Partnership,

I am writing to urge you to improve your action agenda's recommendations on pollution prevention. We need to get to the source of the contamination or we are just wasteing time and money and the problem will not be solved. The source of the problem is the businesses that use the toxic chemicals that end up in Puget Sound.

From: Dulane Crist

Comment: Dear Puget Sound Partnership,

Thank you for your commitment to developing an Action Agenda for a healthy Puget Sound. From struggling orcas to toxic chemicals in our water, the Sound needs quick and decisive action today. I want to make sure we pass a thriving Puget Sound on to future generations.

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-Accelerate the restoration of the Elwha River.

Thank you for your hard work to develop a draft Action Agenda to restore, protect and recover Puget Sound to health by 2020.

On behalf of everything from eelgrass to orcas.

From: Steven Cristol

Comment: Dear Puget Sound Partnership,

The draft Action Agenda is a terrific start. But far more than a nature or environmental initiative, saving the Sound also has major public health implications. Pesticides, and the neurotoxins they contain, are a huge part of the problem -- not only as they affect sea life when draining to the Sound, but as the affect human life around the Sound -- increasing rates of cancer, Parkinson's, and multiple chemical sensitivities (MCS). The Action Agenda must address pesticides -- reducing their use around the sound and using less toxic alternatives that are available -- to be effective and deliver on its full potential. The Partnership must create a real 2020 Action Agenda, not just a 2-year plan that clearly identifies the specific actions that are needed over the next 12 years and the HOW and WHO and BY WHEN each action must be completed. All the actions, including specifics about toxic pesticides reduction, need to be tied together into a comprehensive whole through

measurable benchmarks that must be accomplished in order to achieve recovery by 2020.

Thank you for this opportunity to strengthen a strategy to save Puget Sound.

From: Carolyn Crombie

Comment: Dear Puget Sound Partnership,

I am writing to urge you to improve your action agendas recommendations on pollution prevention.

From: Connie Crosby

Comment: Dear Puget Sound Partnership,

The Partnership staff, the Leadership Council, Ecosystem Coordinating Board, Science Panel and stakeholders throughout the Sound deserve praise for the monumental effort involved in producing the draft Action Agenda. The next step is to finalize a plan that is accountable, transparent, effective and have dedicated new funding sources to the recovery of Puget Sound by 2020.

The Partnership must create a real 2020 Action Agenda, not just a 2-year plan that clearly identifies the specific actions that are needed over the next 12 years and the HOW and WHO and BY WHEN each action must be completed. All the actions need to be tied together into a comprehensive whole through measurable benchmarks that must be accomplished in order to achieve recovery by 2020.

Thank you for this opportunity to strengthen a strategy to save Puget Sound.

From: Cara Cruickshank

Comment: Dear Puget Sound Partnership,

Everyone worked hard to get it done. Your Partnership staff, the Leadership Council, Ecosystem Coordinating Board, Science Panel and stakeholders throughout the Sound deserve a lot of praise for the enormous effort it took to produce the draft Action Agenda. It's ambitious and full of important goals that need to be met. But I don't see any plans of HOW it'll get done, nor any mandates or regulations that will need to be put into place in order for the goals to actually be met. This concerns me greatly. With no "teeth" in this plan, what will it become? With so much work being done on it, I really hope that there will be some added mandates that are funded, for municipalities to do the right things for cleaning up our precious Sound.

The next step is to finalize a plan that holds people or places accountable, is fully transparent, and has dedicated new funding sources to the recovery of Puget Sound by

2020.

The Partnership must create a real 2020 Action Agenda that clearly identifies the specific actions that are needed over the next 12 years, including HOW it'll get done, WHO will do it, and BY WHEN each action must be completed.

Finally, all the actions need to be tied together into a comprehensive whole through benchmarks that are measurable, and that must be accomplished by certain dates in order to achieve recovery by 2020.

I hope you won't mind some honest feedback here. I am working hard on Bainbridge Island, t protect our waters and our shorelines. Tonight I will try to save our only water quality program from the ax of City-wide budget cuts. These municipalities will cry poor and not do what it takes for Puget Sound, unless they have to. Therefore, PLEASE strengthen your strategy with some actual regulations to be followed, in order to ensure all of our efforts to save Puget Sound. Otherwise, it's a lot of great talk, with not enough action backing it up. Let us be realistic about this. Municipalities will not just volunteer to take many of the steps you want them to take, unless they have some funded mandates to follow, and time parameters to complete them by. (Especially with this sagging economy and the budget crunches that are likely to happen).

Thank you for this opportunity to give you feedback and appreciation for all your hard work. I hope we can discuss this more in person at the Aquarium celebration.

From: Erica Crytzer

Comment: Dear Puget Sound Partnership,

I am writing to urge you to improve your action agenda's recommendations on pollution prevention. I want a healthy Puget Sound to be part of the legacy we leave our children.

Many Washington manufacturers continue to use harmful chemicals without any plans to switch to chemicals that are safer for Puget Sound. To protect public health and the environment, Washington's industry must begin phasing out of the worst toxic chemicals and developing plans to switch to safer alternatives.

Please include recommendations to help move Washington's businesses toward safer alternatives and away from chemicals known to be harmful to Puget Sound. These proposals should include

-Increasing the availability of technical assistance to help businesses reduce chemical use.

-Developing a state program to focus on researching safer chemicals and materials.

-Requiring better industry reporting to Ecology of the chemicals currently being used.

From: Herbert Curl, Jr

Comment: Dear Puget Sound Partnership,

Thanks to all for producing the draft Action Agenda. It appears highly unlikely that a plan can be formulated and funded in time to "save" Puget Sound by 2020. It's more likely that only the highest priority actions will be initiated by 2020, given the current economic climate.

The Partnership needs to create more than a 2-year plan. And it needs to clearly identify specific actions that are required over the next 12 years, and beyond, with associated timelines, deadlines, responsibilities and funding.

It is regrettable that there is not yet a conceptual model of the strategic plan components nor a conceptual model of the functioning of the Sound. It's also unfortunate that the focus to date has been on the top of food webs and on anthropogenic forcing of the system, with little or no understanding of intermediate processes.

Nonetheless, it's encouraging that the Partnership has made a good faith start to slowing or stopping the decline of the health of the Sound. Thank you for this opportunity to strengthen a strategy to save Puget Sound.

From: Russell Daggatt

Comment: Dear Leadership Council,

Thank you for the opportunity to comment on the Puget Sound Partnership Draft Action Agenda. I appreciate the tremendous amount of work that has gone into developing it and I support the strong list of measures that, if implemented, will go a long way toward recovering Puget Sound by 2020.

The draft plan includes a few omissions. The final plan should include Outstanding Resource Water (ORW) designation under the Clean Water Act as a tool to help protect rivers and other aquatic habitat. While I strongly support the inclusion of Wild and Scenic designation as a similar tool, in some cases ORW designation will likely prove to be a better, more immediate way for the state to ensure the protection of high quality rivers and other waters. Therefore, I urge the Partnership to include support for the Outstanding Resource Water designation as one of its "Near Term Actions." ORW designations permanently protect high quality waters that are ecologically significant, provide cold water refuges for fish, and/or support important recreational values. Many rivers in the Puget Sound region are eligible for ORW designation. I would also like to encourage you to include funds to move up the removal of the two dams on the Elwha from 2012 to 2010. Removal of the Elwha dams is one of the best chances for salmon and steelhead recovery in the region as it will open up over 70 miles of prime spawning habitat. Removing these dams has also been as a key action to recover our Puget Sound's orca population, which is malnourished thanks to a lack of chinook salmon.

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creating "green jobs" and numerous other economic benefits.

Thank you for taking my comments into consideration.

From: Judy D'Amore

Comment: Dear Puget Sound Partnership,

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-Accelerate the restoration of the Elwha River.

Thank you for your hard work to develop a draft Action Agenda to restore, protect and recover Puget Sound to health by 2020.

On behalf of everything from eelgrass to orcas.

From: Marc Daniel

Comment: Dear Puget Sound Partnership,

I am writing to urge you to improve your action agenda's recommendations on pollution prevention.

From: John D'Antoni

Comment: Dear Puget Sound Partnership,

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The Partnership must create a real 2020 Action Agenda, not just a 2-year plan that clearly identifies the specific actions that are needed over the next 12 years and the HOW and WHO and BY WHEN each action must be completed. All the actions need to be tied together into a comprehensive whole through measurable benchmarks that must be accomplished in order to achieve recovery by 2020.

Thank you for this opportunity to strengthen a strategy to save Puget Sound.

From: Viana Daven

Comment: Dear Puget Sound Partnership,

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Thank you for this opportunity to strengthen a strategy to save Puget Sound.

From: Barbara Davidson

Comment: Dear Puget Sound Partnership,

Thank you for your hard work to develop a draft Action Agenda to restore, protect and recover Puget Sound to health by 2020. When it comes to restoring the health of the Puget Sound, where and how we grow matters. Especially in light of the one million new residents the state expects to welcome by 2020. It's more crucial than ever to focus that growth inside our urban areas so that we can preserve our farm and forest land and protect our rural areas to restore critical habitats and watersheds of the Sound.

While I applaud your effort thus far, the Action Agenda can and must go farther. We need a twenty year plan, not a two year plan. All the actions need to be tied together into a comprehensive plan with measurable benchmarks and timelines in order to achieve recovery by 2020.

As you finalize the final Action Agenda, please:

-Balance regulatory change with land acquisition to accomplish long term recovery goals;

-Take advantage of the region's recent vote to build 34 miles of new light rail - we must capitalize on this investment by requiring more intense development near these station areas that are pedestrian, bicycle and transit friendly;

-Identify adequate and sustained funding for the long haul;

-Clearly identify timelines and responsibilities;

-Be based on science;

-Set meaningful standards for habitat protection.

The Partnership staff, the Leadership Council, Ecosystem Coordinating Board, Science Panel and stakeholders throughout the Sound deserve praise for the monumental effort involved in producing the draft Action Agenda. The next step is secure much needed funding. The 2009 legislature must adopt new funding sources dedicated to the recovery of Puget Sound by 2020.

For Puget Sound!

From: Anna Davis

Comment: Dear Puget Sound Partnership,

I am writing to urge you to improve your action agenda's recommendations on pollution prevention.

Its ridiculous that we allow chemicals known to be highly toxic to people and the environment to be used in industry at all since we also know that they are impossible to contain.

These proposals should include increases in the availability of technical assistance to help businesses reduce chemical use, developing a state program to focus on researching safer chemicals and materials, and requiring better industry reporting of the chemicals currently being used.

Please consider improving your recommendations to support stronger prevention measures.

PugetSoundPartnership
our Sound, our community, our choice

From: Galen Davis

Comment: Dear Puget Sound Partnership,,

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On behalf of everything from eelgrass to orcas.

From: Rose De Dan

Comment: Dear Puget Sound Partnership,

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From: Nancy Dean

Comment: Dear Puget Sound Partnership,

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Thank you for this opportunity to strengthen a strategy to save Puget Sound.

From: Jeanne Deller

Comment: Dear Puget Sound Partnership,

Thank you for your hard work to develop a draft Action Agenda to restore, protect and recover Puget Sound to health by 2020. It could not come at a more pressing time, especially for the Sound's iconic and endangered orca whale. Just this month, researchers reported seven orcas "10% of the Puget Sound population" are missing and believed to be dead. Some experts say dwindling populations of endangered Chinook salmon are at least partly to blame. Is this a sign that our ecosystem is on the verge of collapsing?

The urgency of restoring the Sound to health is at a tipping point and missing orcas are the Sound's "canaries in the coal mine," telling us we are running out of time. But there is hope for the orca, as there was hope for the bald eagle, the California Condor and others on the verge of extinction. The Puget Sound Partnership's Action Agenda is a golden opportunity to do what has not been done for over 20 years- develop and implement a recovery plan that is accountable, effective, transparent and decisive with sustained funding to restore this national treasure to health by 2020.

The draft Action Agenda includes many of the essential elements that need to be done:

-Require low-impact development to reduce stormwater pollution;

-Prohibit new bulkheads near feeder bluffs and forage fish spawning beaches;

-Fund local governments to develop and carry out shoreline master programs;

-Fund enforcement staff at state agencies and local governments;

-Implement specific, aggressive cleanup plans for polluted waters, including TMDLs;

-Fully fund a permanent year-round rescue tug at Neah Bay for oil spill prevention;

-Acquire critical intact parcels for habitat protection and conservation;

-Set strong requirements for water quantity, such as setting in-stream flow for all major rivers.

BUT, more than a list of Soundwide and Action Area-specific actions, the Partnership must create a real 2020 Action Agenda, not just a 2-year plan, that clearly identifies the specific

actions that are needed over the next 12 years and the HOW and WHO and BY WHEN each action must be completed. All the actions need to be tied together into a comprehensive plan with measurable benchmarks and timelines in order to achieve recovery by 2020. The final Action Agenda must:

-Clearly identify timelines and responsibilities;

-Identify adequate and sustained funding for the long haul;

-Be a visionary and long term plan;

-Be based on science;

-Offer a comprehensive and robust program to prevent all sources of stormwater pollution, not just municipal stormwater;

-Strengthen the list of actions for toxic pollution prevention;

-Set meaningful standards for habitat protection;

-Balance regulatory change with land acquisition to accomplish long term recovery goals;

-Expand the indicator species to include more than just salmon, i.e. forage fish, harbor seals, etc.

The Partnership staff, the Leadership Council, Ecosystem Coordinating Board, Science Panel and stakeholders throughout the Sound deserve praise for the monumental effort involved in producing the draft Action Agenda. The next step is secure much needed funding. The 2009 legislature must adopt new funding sources dedicated to the recovery of Puget Sound by 2020.

For Puget Sound!

From: Della Demerjian

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For Puget Sound!

From: Dylan DePaulo

Comment: Dear Leadership Council,

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The draft plan includes a few omissions. The final plan should include Outstanding Resource Water (ORW) designation under the Clean Water Act as a tool to help protect rivers and other aquatic habitat. While I strongly support the inclusion of Wild and Scenic designation as a similar tool, in some cases ORW designation will likely prove to be a better, more immediate way for the state to ensure the protection of high quality rivers and other waters. Therefore, I urge the Partnership to include support for the Outstanding Resource Water designation as one of its "Near Term Actions." ORW designations permanently protect high quality waters that are ecologically significant, provide cold water refuges for fish, and/or support important recreational values. Many rivers in the Puget Sound region are eligible for ORW designation. I would also like to encourage you to include funds to move up the removal of the two dams on the Elwha from 2012 to 2010. Removal of the Elwha dams is one of the best chances for salmon and steelhead recovery in the region as it will open up over 70 miles of prime spawning habitat. Removing these dams has also been as a key action to recover our Puget Sound's orca population, which is malnourished thanks to a lack of chinook salmon.

Especially during difficult financial times, finding opportunities for economic benefit and job creation is important. Removing the Elwha dams provides a tremendous opportunity for creating "green jobs" and numerous other economic benefits.

Thank you for taking my comments into consideration.

From: Tom Des Brisay

Comment: Dear Puget Sound Partnership,

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-Accelerate the restoration of the Elwha River.

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On behalf of everything from eelgrass to orcas.

From: Stephanie Develle

Comment: Dear Puget Sound Partnership,

I am writing to urge you to improve your action agendas recommendations on pollution prevention. Please include provisions that will help move Washington's businesses toward safer alternatives and away from chemicals known to be harmful. These proposals should include increasing the availability of technical assistance to help businesses reduce chemical use, developing a state program to focus on researching safer chemicals and materials, and

requiring better industry reporting of the chemicals currently being used.

From: Shelley Dillon

Comment: Dear Puget Sound Partnership,

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The urgency of restoring the Sound to health is at a tipping point and missing orcas are the Sound's "canaries in the coal mine," telling us we are running out of time. But there is hope for the orca, as there was hope for the bald eagle, the California Condor and others on the verge of extinction. The Puget Sound Partnership's Action Agenda is a golden opportunity to do what has not been done for over 20 years- develop and implement a recovery plan that is accountable, effective, transparent and decisive with sustained funding to restore this national treasure to health by 2020.

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-Expand the indicator species to include more than just salmon, i.e. forage fish, harbor seals, etc.

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For Puget Sound!

From: Dan and Sharon Dodge

Comment: Dear Puget Sound Partnership,

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Many Washington manufacturers continue to use harmful chemicals without any plans to switch to chemicals that are safer for Puget Sound. To protect public health and the environment, Washington's industry must begin phasing out of the worst toxic chemicals and developing plans to switch to safer alternatives.

Please include recommendations to help move Washington's businesses toward safer alternatives and away from chemicals known to be harmful to Puget Sound. These proposals should include:

Increasing the availability of technical assistance to help businesses reduce chemical use.

Developing a state program to focus on researching safer chemicals and materials.

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From: Eric Dolpin

Comment: Dear Puget Sound Partnership,

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On behalf of everything from eelgrass to orcas.

From: Peter Domoto

Comment: Thank you for your efforts in producing the Draft Action Agenda. The participants generated a thoughtful and comprehensive narrative. However, I was disappointed to note the lack of quantifiable outcome measures e.g. Regarding Puget Sound water quality: Temperature, dissolved oxygen, pH, phosphate and nitrate levels, anionic detergent levels, fecal coliform levels, petroleum levels, salinity/conductivity. Additionally, I feel that references to existing EPA standards and legislation (Clean Air and Water) would provide useful indicators and outcome measures for monitoring the health of the sound. Thanks again and keep up the good work.

PugetSoundPartnership
our Sound, our commitment, our chance

From: Robin and Tom Donnelly

Comment: There is no greater local environmental priority than reestablishing the health of the Salish Sea and the tributaries which flow into it. The closings of shellfish beaches and the population drops of salmon and orca are just the tip of the iceberg. It's time to put some funding behind the science and the doing. As a child who experienced a different environmental benchmark here in the fifties and sixties, when wildlife were more prevalent, and as a Beachwatcher now, it is a critical time to act. Thank you for your efforts. We will continue ours.

From: Alison Doyle

Comment: Dear Puget Sound Partnership,

Thank you for your hard work to develop a draft Action Agenda to restore, protect and recover Puget Sound to health by 2020. It could not come at a more pressing time, especially for the Sound's iconic and endangered orca whale. Just this month, researchers reported seven orcas "10% of the Puget Sound population" are missing and believed to be dead. Some experts say dwindling populations of endangered Chinook salmon are at least partly to blame. Is this a sign that our ecosystem is on the verge of collapsing?

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For Puget Sound!

From: Steven Drevecky

Comment: I am currently a college student with a focus in environmental science. While reading the Action Agenda for the Puget Sound and was impressed with the amount of detail and as well with what your priorities were for cleaning up with sound. I have more of a question to ask, the agenda states that there are at least 230,000 gallons of oil and hazardous waste that has been dumped into Puget Sound, with the fines that would be applied with that would potentially cause some larger companies to go out of business (depending if the situation were to get there.) If those companies were to close down from not being able to pay these fines, would there be a ruling for the CEO's of those companies from re-starting another company under a different name just to do the same thing? Well thank you for taking your time to read this, the Action Agenda hits on alot of key points that are essential for the balance of the Puget Sound ecosystem. Thanks!

From: Carolann Driver

Comment: Dear Puget Sound Partnership,

In addition to the letter below, I propose that the use of sonar testing by military and others, as it has been shown to damage marine mammals such as orcas and dolphins, be banned from Puget Sound!

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From: Rene Dubay

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Thank you for this opportunity to strengthen a strategy to save Puget Sound.

From: Suzanne Duley

Comment: Dear Puget Sound Partnership,

I am writing to urge you to improve your action agendas recommendations on pollution

prevention.

From: Logan Dunphy

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From: Randy Dutton

Comment: 27.4 million pounds of aerosola pollutants drift over North America every day from East Asia per NASA. If even 1% precipitates into Puget Sound, it amounts to 274,000 pounds of pollutants. The study was published in April 2008 and is available at http://www.agu.org/pubs/crossref/2008/2007JD009349.shtml

The point is that you may be focusing on the wrong problem. The uncontrolled emissions in China are a result of production shifting overseas due to high cost of production in the US. And our high cost partly is attributed to pollution controls we have in place. You need to get Congress to demand air pollution control in East Asia as a condition to Most Favored Nation status (or similar). Abstract of the study says: "It has been well documented that pollution and dust from east Asia can be transported across the North Pacific basin, reaching North America and beyond. In this study, we assess the transpacific transport of pollution aerosol (defined as a mixture of aerosols from urban/industrial pollution and biomass burning) by taking advantage of the much improved measurement accuracy and enhanced new capabilities of satellite sensors in recent years.

A 4-year (2002 to 2005) climatology of optical depth for pollution aerosol was generated from Moderate Resolution Imaging Spectroradiometer (MODIS) observations of fine- and coarse-mode aerosol optical depths. The pollution aerosol mass loading and fluxes were then calculated using measurements of the dependence of aerosol mass extinction efficiency on relative humidity and of aerosol vertical distributions from field campaigns and available satellite observations in the region. We estimated that about 18 Tg/a pollution aerosol is exported from east Asia to the northwestern Pacific Ocean, of which about 25% reaches the west coast of North America. The imported flux of 4.4 Tg/a to North America is equivalent to about 15% of local emissions from the United States and Canada. The pollution fluxes are

largest in spring and smallest in summer. For the period we have examined the strongest export and import of pollution particulates occurred in 2003, largely because of record intense Eurasia boreal forest fires in spring and summer. The overall uncertainty of pollution fluxes is estimated at a factor of 2. Simulations by the Goddard Chemistry Aerosol Radiation and Transport (GOCART) and Global Modeling Initiative (GMI) models agree quite well with the satellite-based estimates of annual and latitude-integrated fluxes, with larger model-satellite differences in latitudinal and seasonal variations of fluxes."

From: Jackie Easley

Comment: Dear Puget Sound Partnership,

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From: Jennifer Easley

Comment: Dear Puget Sound Partnership,

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Developing a state program to focus on researching safer chemicals and materials.

Requiring better industry reporting to Ecology of the chemicals currently being used.

From: Ronald Eber

Comment: Dear Puget Sound Partnership,

A comprehensive action plan is a sound approach but must be specific and require all parties to participate and meet clear and object targets. Voluntary efforts will not do.

All new building must comply and all construction and improvement projects must be brought into compliance with appropriate water quality standards.

An overall regional commission is needed to quide, oversee and enforce the plan.

From: Keith Edgerton

Comment: Dear Puget Sound Partnership,

I am writing to urge you to improve your action agenda's recommendations on pollution prevention.

Please for the sake of our children and the quality of their lives and ones to follow. Not to mention the entire ecosystem that is a part of Puget Sound.

My young girls are not even allowed to STAND in the water at Budd Inlet per the city of

Olympia due to pollution. Please act now! thanks!

From: Stephanie Edwards

Comment: Dear Puget Sound Partnership,

I am writing to urge you to improve your action agenda's recommendations on pollution prevention.

From: Chris Eggen

Comment: Dear People,

I read the draft action agenda and have a couple of brief comments.

1. In the list of what people can do to help in the Introduction on page 6, I noticed NO mention of reducing pesticide use. Is this because overuse of pesticides in yards is not an issue for recovery of Puget Sound? In any case, I would add a comment that pesticides use should be minimized.

2. In the introduction on Page 7, I noticed no no comment on supporting local city and county efforts on cleanup. I would add a section:

"Support local City and County Efforts at Clean Up", with subbullets "Speak out at Council Mettings"

"Support reasonable Regulation to implement Action Agenda", and "Volunteer to clean up parks and natural areas"

3. On Question 3, Page 6, Aection A.1. I recommend that we add the word "livable" after "... dense, compact". There is no chance to get people into denser communities unless we make them livable and make the construction have high quality.

4. On Question 3, page 18. I have a question: Are small scale projects in urban areas of any value? If so, they are not mentioned.

From: Claire Egtvedt

Comment: Dear Puget Sound Partnership,

Thank you for your hard work to develop a draft Action Agenda to restore, protect and recover Puget Sound to health by 2020. When it comes to restoring the health of the Puget Sound, where and how we grow matters. Especially in light of the one million new residents the state expects to welcome by 2020. It's more crucial than ever to focus that growth inside our urban areas so that we can preserve our farm and forest land and protect our rural areas to restore critical habitats and watersheds of the Sound.

While I applaud your effort thus far, the Action Agenda can and must go farther. We need a twenty year plan, not a two year plan. All the actions need to be tied together into a comprehensive plan with measurable benchmarks and timelines in order to achieve recovery by 2020.

As you finalize the final Action Agenda, please:

-Balance regulatory change with land acquisition to accomplish long term recovery goals;

-Take advantage of the region's recent vote to build 34 miles of new light rail - we must capitalize on this investment by requiring more intense development near these station areas that are pedestrian, bicycle and transit friendly;

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From: Susan Ehler

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our home, our community, our choice

From: Maia Eisen

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From: Sandra Elder

Comment: Dear Puget Sound Partnership,

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Accelerate the restoration of the Elwha River.

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On behalf of everything from eelgrass to orcas.

From: Laura Elfline

Comment: Dear Puget Sound Partnership,

I am writing to urge you to improve your action agendas recommendations on pollution

prevention.

From: Christine Ellis

Comment: Dear Puget Sound Partnership,

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From: Scott Ellis

Comment: Dear Puget Sound Partnership,

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From: Richard Ellison

Comment: Dear Puget Sound Partnership,

As a biologist and community college professor, I urge you to finalize an action plan .

The Plan must effectively reduce urban and farm non-point source pollutants and point source industrial wastes. It must vastly reduce the pesticides and herbicides used by homeowners and landscape prefessionals. It must restore the lost freshwater, brackish, and saltwater wetlands critical to salmon recovery. It must stop development of shorelines, and improve existing habitats.

These actions must be accountable, transparent, effective and have dedicated new funding sources to the recovery of Puget Sound by 2020.

The Partnership must create a real 2020 Action Agenda, not just a 2-year plan that clearly identifies the specific actions that are needed over the next 12 years. Its all in the details, and they should be spelled out and committed to.

Thank you.

From: Christine Emmel

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From: Helen Engle

Comment: Dear Puget Sound Partnership,

I am writing to urge you to improve your action agendas recommendations on pollution prevention.

The Orcas are telling us something -- I hope their message isn't, "It's Too Late Guys!"

No more studying, no more research, let's do things!

From: Pamela Engler

Comment: Dear Puget Sound Partnership,

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BUT, more than a list of Soundwide and Action Area-specific actions, the Partnership must create a real 2020 Action Agenda, not just a 2-year plan, that clearly identifies the specific actions that are needed over the next 12 years and the HOW and WHO and BY WHEN each action must be completed. All the actions need to be tied together into a comprehensive plan with measurable benchmarks and timelines in order to achieve recovery by 2020. The final Action Agenda must:

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-Be based on science;

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-Strengthen the list of actions for toxic pollution prevention;

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-Expand the indicator species to include more than just salmon, i.e. forage fish, harbor seals, etc.

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For Puget Sound!

From: Anne Engstrom

Comment: Dear Puget Sound Partnership,

I am writing to urge you to improve your action agendas recommendations on pollution prevention.

Cap and invest. Cap the polluters, tax them and invest in ways to clean up puget sound or prevent more pollution. Same as the Co2s. Cap and Invest. Take care of our sound and our future.

From: Sylvia Ericson

Comment: Dear Puget Sound Partnership,

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Thank you for this opportunity to strengthen a strategy to save Puget Sound.

From: Dan Estabrook

Comment: I agree with your plan to restore the property along our water ways to their original state, but first start with Seattle. Then once you have clean up and restored those shore lines to their original state you can move to Tacoma and Olympia. By restoring these areas first you will be leading by example and be cleaning up the most severe areas, other whys this is just another land grab using government regulation to control land without purchasing it. If you wish to stop gross pollution in the San Juan Islands then mandate those individuals and families to dispose of their refuse properly. I know for a fact that those who live and vacation on islands that are mostly accessible by private craft dump their waste in our waters. Ask them where and how they dispose of the garbage and follow it up with how much does it cost. If you find that this would be too difficult to police than just add additional fees to their property taxes for clean water.

If the Orcas are starving to death then stop the inland commercial fishing, thats right Tribal fishing. We had lots of fish prior to Judge Bolts decision and now with so many Casinos the tribes have another source of existence. You should also dredge the rivers instead of raising the levels around them. This will speed up the flow of the river thus clean up spawning areas that have silted in creating more habitat for fish. You claim your study is based on science this may be so, however you continue to keep your head buried in the sand on several issues. You also stop development which punishes property owners. With the existing regulations future development will be save to our environment as well as adding additional revenue to the State. There needs to be a fair balance and stop the "all or none approach" private property rights should be protected.

From: Alice Evans

Comment: Dear Puget Sound Partnership,

Thank you for your hard work to develop a draft Action Agenda to restore, protect and recover Puget Sound to health by 2020. When it comes to restoring the health of the Puget Sound, where and how we grow matters. Especially in light of the one million new residents the state expects to welcome by 2020. It's more crucial than ever to focus that growth inside our urban areas so that we can preserve our farm and forest land and protect our rural areas to restore critical habitats and watersheds of the Sound.

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As you finalize the final Action Agenda, please:

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For Puget Sound!

From: Joe Evans

Comment: Dear Puget Sound Partnership,

I am writing to urge you to improve your action agenda's recommendations on pollution prevention. I want a healthy Puget Sound to be part of the legacy we leave our children.

Many Washington manufacturers continue to use harmful chemicals without any plans to switch to chemicals that are safer for Puget Sound. To protect public health and the environment, Washington's industry must begin phasing out of the worst toxic chemicals and developing plans to switch to safer alternatives.

Please include recommendations to help move Washington's businesses toward safer alternatives and away from chemicals known to be harmful to Puget Sound. These proposals should include

-Increasing the availability of technical assistance to help businesses reduce chemical use.

-Developing a state program to focus on researching safer chemicals and materials.

-Requiring better industry reporting to Ecology of the chemicals currently being used.

From: John Evans

Comment: Generally very professional and well done. I offer the following suggestions specific to your report on San Juan County.

Under Community and Economy I suggest that you include three additional bullets; Quality of life for island residents, eco tourism and home construction. The last two, tourism and construction are the life blood of our economy and tax base. Conservation of our natural

resources and environment are the foundation of why most of us choose to live here.

Under Harvest, I would include herring and surf smelt. It makes little sense to put additional restrictions on shoreline property owners and allow someone to net the fish as they come in to spawn.

From: Susan Evans

Comment: Dear Puget Sound Partnership,

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For Puget Sound!

From: Franklin Eventoff

Comment: Dear Puget Sound Partnership,

Along with the agenda issues below, an area that has been overlooked is the Chunkanut Mountains, and including Blanchard Mountain. We're in the middle of a law suit to protect Blanchard Mountain, and have come up against special interests in opposition to the Chuckanut Mountains Park District, a citizendriven petition dedicated to conservation and recreation. The initiative was shot down for unreasonable political circumstances.

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From: Mark Everard

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From: Jennifer Eveskcige

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Please include recommendations to help move Washington's businesses toward safer alternatives and away from chemicals known to be harmful to Puget Sound. These proposals should include:

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Developing a state program to focus on researching safer chemicals and materials.

Requiring better industry reporting to Ecology of the chemicals currently being used.

From: Stephen Ewall

Comment: Dear Puget Sound Partnership,

I am writing to urge you to improve your action agendas recommendations on pollution prevention.

From: Nicole Faghin

Comment: Thank you for the opportunity to comment on the Puget Sound Action Team. Please consider the following:

Add to Near Term Actions B.3. the following Action: 2. Implement "Green Shores" certification procedure. The Green Shores voluntary certification procedure for coastal developers, contractors and landowners is designed to encourage sustainable use of coastal ecosystems through planning and design that recognizes the ecological features and functions of coastal systems. The certification system is based on the Green Shores principles and the Green Building rating model. This tool is intended for use by designers, builders and owners to guide Green Shores design and assess design performance.

From: Anna Fahey

Comment: Dear Puget Sound Partnership,

I am writing to urge you to improve your action agenda's recommendations on pollution prevention.

From: Patti Fairbanks

Comment: Dear Puget Sound Partnership,

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PugetSoundPartnership
our community, our chance

From: Adriana Faria

Comment: Dear Puget Sound Partnership,

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I urge the Partnership to incorporate accountability, benchmarks of success, and ample funding into this Agenda.

The draft Action Agenda includes many of the essential elements that need to be accomplished, but in addition, the final Action Agenda must also:

-Amend the Cruise Ship MOU to ban all cruise ship discharges in Puget Sound;

-Prioritize the protection and restoration of the State's forage fish spawning beds;

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-Update the guidance for open water dredge disposal of PCBs;

-Expand the indicator species to include forage fish abundance and harbor seal toxics loading; and

-Accelerate the restoration of the Elwha River.

Thank you for your hard work to develop a draft Action Agenda to restore, protect and recover Puget Sound to health by 2020.

On behalf of everything from eelgrass to orcas.

From: Andrea Faste

Comment: Dear Puget Sound Partnership,

I am writing to urge you to improve your action agenda's recommendations on pollution prevention. The loss of orcas is a sure sign that things are not right with Puget Sound.

From: Jim Faulstich

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For Puget Sound!

From: Carol Faust

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From: Daniel Feduff

Comment: Dear Puget Sound Partnership,

Thank you for tackling the enormous challenge of saving Puget Sound head on. We appreciate your boldness and your efforts to engage the broader community, to listen to us and to base your decisions on science.

Surfrider Foundation is committed to supporting your efforts, primarily by encouraging people to get out in the watershed and into the Sound, to enjoy it, to appreciate it and to take action to protect and restore it. Through projects like Rise Above Plastics, beach clean ups and ocean friendly gardens, we will do our best to promote Sound stewardship practices.

In order to make sure that we reach our goal of a healthy Puget Sound by 2020, we ask that you strengthen the Action Agenda by incorporating the following recommendations:

- Be stronger on water quality measures by offering a comprehensive and robust program to prevent all sources of stormwater pollution and strengthening the list of actions for toxic pollution prevention.

- Develop different indicators for human well-being to include more opportunity for quality water-based recreation through increased shoreline access, clean beaches, and clean water.

- Be stronger on accountability by incorporating clear benchmarks to get us to a healthy Puget Sound by 2020.

- Create more opportunities and stronger protection programs to improve the public's interaction with the shoreline and achieve enough water quality improvement and habitat restoration to inspire the public to go to the water's edge more frequently.

- Ensure that there is enough funding for Puget Sound to achieve the goals laid out in this ambitious agenda.

Thank you for your hard work to develop a draft Action Agenda to restore, protect and recover Puget Sound to health by 2020.

From: Richard Feely

Comment: Dear Partnership Members:

After reading the action plan I was quite surprised that there was very little discussion of the important role that ocean acidification might have on Puget Sound ecosystems. Our recent research that was published in Science In June demonstrated that coastal upwelling along the Washington-Oregon-California coasts brings ocean acidified "corrosive" waters up onto

the continental shelf in the spring and summer months. It its these same waters and fills the bottom waters of Puget Sound in the mid- and late summer. The naturally high amounts of biological activity in the Sound will probably cause the deep waters to become even more corrosive to the indigenous shellfish species, particularly clams and oysters. Since ocean acidification can also affect the chemistry of many toxic compounds in seawater, it may can also affect other marine species. I would be have to discuss these issues in detail with your Science Panel.

From: W Feguson

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From: Alissa Ferrell

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From: Malcolm Ferrier

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Our Sound, our community, our chance

From: Ellen Fillion

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On behalf of everything from eelgrass to orcas.

From: Sheree Fisher

Comment: I am writing to urge you to improve your action agendas recommendations on pollution prevention. If this were your grandmother who was sick, you would not want the doctors to hold back on any necessary treatment. Our Pudget sound is gravely ill. Treat mother nature as well as you would want a doctor to treat your family and we will see that the results are much more effective. The current draft of the action plan does not include provisions that will help move Washington's businesses toward safer alternatives and away from chemicals known to be harmful. These proposals should include increasing the availability of technical assistance to help businesses reduce chemical use, developing a state program to focus on researching safer chemicals and materials, and requiring better industry reporting of the chemicals currently being used. Our Environment is the issue that led me to vote for our Governor twice. Please do your best to clean up our Sound.

PugetSoundPartnership
our Sound, our commitment, our chance

From: Heather Flanigan

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PugetSoundPartnership
our sound, our community, our c

From: Gail Fligstein

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From: Courtney Flora

Comment: Dear Puget Sound Partnership,

The Partnership staff, the Leadership Council, Ecosystem Coordinating Board, Science Panel and stakeholders throughout the Sound deserve praise for the monumental effort involved in producing the draft Action Agenda. The next step is to finalize a plan that is accountable, transparent, effective and have dedicated new funding sources to the recovery of Puget Sound by 2020.

The Partnership must create a real 2020 Action Agenda, not just a 2-year plan that clearly identifies the specific actions that are needed over the next 12 years and the HOW and WHO and BY WHEN each action must be completed. All the actions need to be tied together into a comprehensive whole through measurable benchmarks that must be accomplished in order to achieve recovery by 2020.

Thank you for this opportunity to strengthen a strategy to save Puget Sound.

PugetSoundPartnership
our sound, our community, our chance

From: Keith Folkerts

Comment: I submit these comments on my own behalf, not that of my employer.

I have worked for 15 years in local government at the forefront of many of the region's central environmental issues. I have been on that "bleeding" edge of trying to help society do things better. I have firsthand experience trying to put into place many state, federal, and local environmental initiatives; all too often these initiatives have not achieved their intent. Based on their overall effectiveness, here's how I'd grade several of the major effort I've been personally involved with:

-2496 salmon recovery processes: B+ (technically sound prioritization of recovery projects, would be more effective with more staff to implement projects, do monitoring)

-2514 watershed planning: D+ (vetoed, effort to plan & implement water resource solutions on a regional basis has evaporated due to a lack of regional mandate to collaborate and no staffing)

-Alternative futures planning: C (excellent public involvement, excellent technical support; not implemented in the end due to staff limitations—limited benefits realized)

-Comprehensive Plan update: C (disregarded most environmental analysis; the document is so comprehensive that it provides no real guidance/prioritization; it sits on the shelf and is ignored)

-Critical Areas Ordinance revision: C (one-size-fits-all buffers, aquifer recharge restrictions for water quality only—not water quantity)

-ESA 4(d) exemption for land use: D- (scrapped when political landscape changed (Bush election))

-Habitat acquisition efforts: C+ (good while it lasted—1,000+ acres purchased by WDFW, now the effort has ceased because no entity wants to own the land)

-Habitat restoration projects: B+ (accomplishing meaningful projects, needs more staff)

-Purchase of development rights efforts: B (success this coming this fall?, needs more $ and staff)

-Salmonid refugia study: B (great information, has not been utilized in land use plans)

-Shoreline assessment: A- (in progress, score will drop if info not used in SMP update and restoration project prioritization & scoping)

-Stream Team volunteer monitoring/restoration program: B+ (involves, educates citizens)

-Transfer of Development Rights program: D+ (on hold, doesn't account for land's ecosystem importance, needs staff)

-WAC 400-12 non-point pollution plans: B+ (involved citizens, resulted in a great SSWM program)

-Water reclamation program (regional): C- (lacks a regional view and emphasis on using water for environmental applications, no staff)

-Wetland mitigation bank program: F (dropped, opportunities lost)

In general, these initiatives have been well-intentioned, and in some ways each has helped move the ball forward, but all too often we end up fumbling that ball before we score. Examples:

-On behalf of a county and four cities, our county negotiated a land use ESA 4(d) exemption which was very close to being accepted by NMFS. The plan was scrapped as political realities (Bush's election) lowered the incentive for locals to take action. Result: continued habitat degradation from inappropriate development/stormwater management; local government lack of support for habitat/open space protection; continued reliance on one-size-fits-all stream buffers.

-Our county led the effort to establish our 2514 Planning Unit (3 counties, 3 tribes, 5 cities, 4 purveyors as Initiating Governments; many stakeholders on Planning Unit) and led the process through to its completion. The plan was vetoed by one entity which didn't like the process to start with.

-After the demise of the 2514 Watershed Planning process, our county led a follow on effort to implement a high priority recommendation: reclaimed water. After success in conceptualizing several innovative applications and attracting state grants, the regional effort has been derailed due to a lack of clarity about whose job it is to coordinate the regional effort (waste water utility?, water purveyor?, natural resource/planning department?).

Result: the benefits of a regional approach to the issue are lost, individual efforts are on-again-off-again and lack an emphasis of using the reclaimed water for environmental applications.

-Our county, with significant state and federal support, helped craft an alternative futures planning process which engaged the community and stakeholders, incorporated technical analysis by top-notch scientists, developed a preferred scenario and list of guidelines for a watershed-based sub-area land use plan, and created a process which could be replicated elsewhere. The sub-area plan was never adopted; the process is not being replicated. Result: the UGA was expanded into an area contrary to the preferred alternative; we continue with sub-area plans which are based on political boundaries not watersheds.

-A year ago our salmon recovery lead entity was on the verge of maturing into a capable regional organization, but efforts to solidify the organization with an MOU by the counties, tribe and cities has stalled (for a year) due to concerns of one elected official about how the organization is structured. Result: we lack a regional organization with buy in from electeds and participation by front-line staff which can accomplish the many tasks needed for us all to re-tool our efforts to address ecosystem needs. The lead entity is understaffed for its current responsibilities; if more duties were to be added the organization would require more staff.

-After working very hard to receive grant funds to purchase from a willing seller high quality habitat within the largest Priority Conservation Area in the Puget Trough-Willamette Valley-Georgia Basin ecoregion, our consortium of county, state, tribal and non-profit groups lacked the wherewithal to make a land purchase because no entity wanted to own the land. Result: $1M in acquisition funds were turned back to the state.

-After receiving positive indications from the state regarding a very innovative grant application to develop a wetland mitigation bank that involved using reclaimed water to enhance a wetland in what could become a public park, our county withdrew the application over a concern about who would manage the effort (Wastewater?, Planning Dept? Parks?). Result: the wetland was sold to a developer; the least expensive and most environmentally beneficial place to use reclaimed water is likely lost.

-After creating a 3-member natural resources staff in the Commissioners' Office to help address ESA issues of the early 2000s, a new board decided to place the staffers within the planning department, supposedly to improve interaction between natural resource issues and long-range and current planning. Result: lack of policy-level attention to environmental issues, lack of coordination with Public Works and Parks departments; no significant improvement in influence of natural resources staff in long range planning and permitting decisions.

We are witnessing a failure of support for front line efforts to implement the many great ideas that come down to the local level from on high.

Implementation of good ideas always includes more complexity than anticipated. It's not that we don't know what needs doing—for the most part we do—what we need is more people on the front lines to implement and sustain initiatives. A poor plan executed well is better than an excellent plan executed poorly. Currently we're executing plans poorly.

We are experiencing profound lack of ability of our agencies to resolve ecological issues because they are not organized around ecosystems. For example, if habitat preservation is the highest ecological need, some regional entity or local entities in all areas must be willing and able to purchase and hold land. If county commissioners and mayor/city councils have staff to provide advice and direction for economic development issues but not for natural resource issues, our communities will not turn the corner on saving the Sound. Each county should have a natural resources department on par with planning, public works, and parks departments.

DNR operates on behalf of trusts to provide sustained support of schools and other institutions. Similarly, PSP should be given a legal trust mandate to operate on behalf of the Sound (as determined by the ecosystem indicators). This would remove the agency from direct political influence. The agency should establish in each action area (or as appropriate) a local entity to fulfill at least two roles: (1) do monitoring in support of Sound-wide ecosystem indicators, and (2) act as an "environmental auditor" to ensure items for which state agencies, counties, cities, tribes, etc. are accountable are happening as reported. These local entities may also be the most appropriate place to house other functions (e.g., habitat conservation, restoration efforts, assisting small jurisdictions with many implementation issues).

To create organizations which are up to the task of implementing these things, I would recommend the PSP have local organizations established using the tenants of "Policy Governance" as developed by John Carver (Boards that Make a Difference, 1997). The PSP could exert appropriate guidance over the local organizations by requiring they adopt specific policies, while allowing the local governing body overseeing the effort to add their own policies (as long as they don't contradict the regional policies).

To frame issues regarding Puget Sound recovery in a way that makes sense to liberals and conservatives, I recommend the Leadership Council consult with George Lakoff, Berkeley professor of cognitive linguistics. To help think about how to effectively describe PSP's efforts to the public, I recommend the Leadership Council consult with John Reutten of Resource Trends, Inc. in southern California.

The Action Agenda will be a success to the extent that it focuses attention on implementing key items well. To accomplish that there must be sufficient staff on the front lines.

From: Mary Lou Francis

Comment: Dear Puget Sound Partnership,

I am writing to urge you to improve your action agenda's recommendations on pollution prevention.

From: Andrea Frank

Comment: Overall, the Action Agenda is extremely organized and it provides specific details on the actions that must occur to reach the conservation goals that the Partnership is so passionate about.

Looking specifically at the section dealing with protection of already existing ecosystems, the focus of preserving these important habitats is crucial in a landscape scale conservation strategy. The scarce floodplains and wetlands around Puget Sound were initially highly developed due to their proximity of transportation access, but ironically these are the areas that need to be preserved most aggressively. The wide range of species that these floodplains support is the primary reason why they need protection.

Also the draft later states that it is much cheaper to restore existing habitat than it is to convert already developed areas back to natural functions. I think that is why the Partnership chose to address the protection of intact ecosystems first in their discussion.

As for solutions to gaining critical land back to state ownership for preservation poses a great challenge. This is mainly due to the fact that when large tracts are needed the ownership is scattered, in rare cases it is so extreme that the land has a checkerboard pattern of private ownership. So acquisition of wildlife conservation areas in large amounts is slow, and no major ecosystem functions will change if slow acquisition occurs. The Agenda describes the current situation that, "protection measures are intended to protect individual pieces of systems typically at a site scale" (5), rather than relationships and processes between

ecosystems across the larger Puget Sound region.

Looking at some possible solutions to the problem of intact ecosystems, the transfer of development rights would conserve rural areas, and with more transfers comes more coordination between habitats simply because more area is protected from development in critical areas. The specific strategies and measures that the Partnership lays out in section A and throughout the draft are crucial in tracking improvements of habitats.

Another important factor that the Agenda considers is the opportunity for adaptive management which is the vital point in habitat conservation. As the process of transferring development rights proceeds, adaptive management will be required to ensure that the most essential lands are conserved and that the landowner is fully compensated for his or her rights. The fact that the Puget Sound Partnership realizes how important comprehensive and region wide strategies are in dealing with land conservation assures me that their plan can be extremely success ful as long as counties cooperatively implement the outlined approach. I look forward to seeing how these changes will affect the region in both the short and long term. Thanks for the opportunity to provide feedback!

From: Polly Freeman

Comment: Dear Puget Sound Partnership,

Thank you for your commitment to developing an Action Agenda for a healthy Puget Sound. From struggling orcas to toxic chemicals in our water, the Sound needs quick and decisive action today. I want to make sure we pass a thriving Puget Sound on to future generations.

I urge the Partnership to incorporate accountability, benchmarks of success, and ample funding into this Agenda.

The draft Action Agenda includes many of the essential elements that need to be accomplished, but in addition, the final Action Agenda must also:

-Amend the Cruise Ship MOU to ban all cruise ship discharges in Puget Sound;

-Prioritize the protection and restoration of the State's forage fish spawning beds;

-Complete the Management Plan for the Cherry Point Aquatic Reserve;

-Identify adequate and sustained funding for Plan implementation;

-Update the guidance for open water dredge disposal of PCBs;

-Expand the indicator species to include forage fish abundance and harbor seal toxics loading; and

-Accelerate the restoration of the Elwha River.

Thank you for your hard work to develop a draft Action Agenda to restore, protect and recover Puget Sound to health by 2020.

On behalf of everything from eelgrass to orcas.

From: Rona Frimmer

Comment: Dear Puget Sound Partnership,

I am writing to urge you to improve your action agenda's recommendations on pollution prevention.

From: Brian Frost

Comment: Dear Puget Sound Partnership,

Thank you for tackling the enormous challenge of saving Puget Sound head on. We appreciate your boldness and your efforts to engage the broader community, to listen to us and to base your decisions on science.

Surfrider Foundation is committed to supporting your efforts, primarily by encouraging people to get out in the watershed and into the Sound, to enjoy it, to appreciate it and to take action to protect and restore it. Through projects like Rise Above Plastics, beach clean ups and ocean friendly gardens, we will do our best to promote Sound stewardship practices.

In order to make sure that we reach our goal of a healthy Puget Sound by 2020, we ask that you strengthen the Action Agenda by incorporating the following recommendations:

- Be stronger on water quality measures by offering a comprehensive and robust program to prevent all sources of stormwater pollution and strengthening the list of actions for toxic pollution prevention.

- Develop different indicators for human well-being to include more opportunity for quality water-based recreation through increased shoreline access, clean beaches, and clean water.

- Be stronger on accountability by incorporating clear benchmarks to get us to a healthy Puget Sound by 2020.

- Create more opportunities and stronger protection programs to improve the public's interaction with the shoreline and achieve enough water quality improvement and habitat restoration to inspire the public to go to the water's edge more frequently.

- Ensure that there is enough funding for Puget Sound to achieve the goals laid out in this ambitious agenda.

Thank you for your hard work to develop a draft Action Agenda to restore, protect and recover Puget Sound to health by 2020.

From: Bob Fuerstenberg

Comment: Despite a few disagreements and some clarifications, you all did a fine job.

Well done. I appreciate the work you have done in drafting this agenda. Guess you have abit more work to do, eh?

PugetSoundPartnership
our sound, our community, our chance

Draft Puget Sound Action Plan
Comments from Robert Fuerstenberg
Ecologist
November 17th, 2008

Question 1.

The accountability discussion is quite well done. I appreciate the effort toward developing indicators and benchmarks, necessary measures for assessing the trends and outcomes of recovery efforts. I have just a couple concerns, however.

1. In the land cover target and benchmark, there is a tacit assumption that further loss of forest cover is inevitable and without significant effect on recovery (is that true? If so, where are the mitigative actions related to this decline?). A further 10% loss of forest cover (from the 2001 baseline) is unlikely to signal effective recovery, especially for terrestrial biodiversity in the lands below 1000 feet. Furthermore, further forest loss will reduce the storage of carbon at a time when sequestration is probably critical for ecosystem resilience. Attaining biodiversity and climate change goals in the Puget Lowlands will more likely require an increase in forested acreage each year rather than a further decrease.
2. All forests are not equal, whether for biodiversity benefits, hydrologic benefits, or climate change benefits. The historic condition across much (if not most) of the Puget Lowland reflected dominance by conifers rather than by the deciduous forests that dominate the region today. The indicator and benchmark should reflect (but not necessarily mimic) the historic condition under which we must assume that the Puget Sound ecosystem was sustainable and ecologically healthy. At some point, indicators should probably be set for more specific goals such as biodiversity.

Question 2.

<u>How healthy is PS?</u>

Under the human well-being category, why is there no indicator for a reduction in environmental threats such as flooding, for example, or climate change that could be related to successful ecosystem management? Moreover, there is little acknowledgement of the role of biodiversity in human well being either.

Under the species and food webs category, terrestrial food webs have no specific indicators or benchmarks. We cannot assume that our terrestrial food webs are any better off than our freshwater and marine ones.

In the land use and habitat category, there are no landscape indicators and no habitat type indicators other than eelgrass. Yet, old forests, prairies, and marshes are called out as equally imperiled. Again, if biodiversity is a goal of the PSP, then there must be

indicators and benchmarks for other landscape types and ecosystems other than forests and eelgrass. While the historic condition may not be achievable, some status and trend measures for these ecosystems should be developed. Some could be derived from the Washington Biodiversity Strategy or from the work of TNC and King County, for example.

For freshwater resources, the attainment of minimum instream flows is a useful provisional indicator but a set of indicators reflective of a more natural flow approach will be necessary if ecosystem processes and functions are to be sustained. It would be worth looking through the PSTRT's guidance on VSP and flow (PSTRT 2008, draft).

Guiding principles for Ecosystem management in Puget Sound.

These are excellent principles for development and implementation of the action agenda. However, they seem to be a mixed set of criteria for choosing and implementing activities with some few guiding principles for ecosystem management. Ecosystem management principles are rooted in the behavior of ecosystems and recognize attributes of scale, levels of organization, and the relationship among process, structure, and function. There are many useful discussions of ecosystem management that could provide a basis for evaluation of strategies developed through the principles and criteria you have listed here. A few of them are:

> Jorgenson and Muller, eds. 2000. Handbook of Ecosystem Theory and Management. CRC Press.
>
> Grumbine, E. 1994. What is ecosystem management? Conservation Biology 8 (1): 27-38.
>
> Spence, B.C., G.A. Lomnicky et al. (1996). An Ecosystem Approach to Salmonid Conservation. TR-4501-96-6057. ManTech Environmental Research Services Corp., Corvallis, OR.

Still, here are few of my favorites that could inform the work of ecosystem management:

1. The ecosystem is an appropriate target level for conservation planning and for integrating concerns from larger and smaller scales and levels of organization. This does not exclude habitats or species from consideration as conservation objectives; it implies that single species or single habitat conservation is unlikely to be successful. Ecosystems integrate process, structure and function at a useful scale for conservation.
2. Conservation of a single level of organization (a single species for example) or at a single spatial scale (a reach in a river or a habitat patch in a terrestrial environment) is unlikely to be successful;
3. Conservation of entire functioning landscapes and their associated processes must be addressed;

4. The resilience of systems (the ability to recover after a disturbance) is a critical attribute of sustainability. Multiple representations of systems across the landscape are necessary.
5. The units of conservation should be based on the boundaries described by the interaction of the processes and structures that control system function and maintain mosaic integrity (minimum dynamic areas): forests and fires, floodplains and floods, riparian forests and large woody debris recruitment, etc. Single habitats or habitat features are not useful targets for conservation.
6. Conservation must recognize the timing and duration of ecological cycles and the variability inherent in ecological systems;

Question 3.

Priority A. Protect intact ecosystem processes, structures, and functions

This discussion could benefit from a brief introduction to ecosystem attributes, perhaps with a few examples and some definitions of process, structure and function. Several terms are used that have distinct meanings in ecosystem management but seem to be used almost interchangeably here. First, recognize that landscapes, ecosystems and habitats are not equivalent ecological units. Concomitant with geographic scale are temporal scale and, often, levels of ecological and biological organization (sub-populations > populations > species). We should be as clear as we can about these fundamentals that support the work of the action agenda. The most recent work in landscape and ecosystem ecology recognizes these hierarchical units across the land and water system beginning with the small unit of habitat or patch:

Habitat (patch) > ecosystem > landscape > eco-region

A focus on the ecosystem, while appropriate, does not neglect larger and smaller units of the system and recognizes time scales associated with process and function at each geographic scale (the hierarchy principle of ecosystems).

I agree that the region lacks an integrative habitat protection strategy but it seems to me that even with such a strategy focused on habitats, we would still miss our recovery targets. The focus for most protection should be on the ecosystem level of the hierarchy, with other work directed at whole landscapes and rare and unusual habitats. Working at the ecosystem level is, in itself an integrated approach to habitat sometimes, the development of a framework that recognizes appropriate units of conservation (the ecosystem) is the crucial first step to integration.

Rationale for action

This section confused me a bit. Some of that confusion arises from the conflation of “ecosystems” with “resources”, and the inclusion of resource lands in this section. If we are looking to protect intact ecosystems, we must first know what and where they occur,

and we should understand how other parts of the landscape—the agro-ecosystems (including working forests and farms) affects ecosystem function. To toss the working lands into this section make some assumptions about system integrity that are likely unfounded. I suggest a separate section on the services provided by working lands, similar to Priority A: *Protect and manage working resource lands in a manner that adds to the integrity of Puget Sound.* Like in section A.4. Probably where this belongs.

Omitted here are the rare and unique ecosystems of the Sound and its environs: remnant old growth forests, prairies, rocky shoreline, saltwater marshes. While I agree that protecting those ecosystems that are generally intact is a fine approach, we must remember that the rare ecosystems add richness and diversity to the landscape. Moreover, it will be the management of lands and waters surrounding the protected areas that will ultimately determine the fate of these protected areas. Furthermore, the protected areas must be part of a system that lends resilience and support to species and ecosystem sustainability.

Improving strategies over time.

While I am heartened to see the proposed studies in this section, there should be further components focused on landscapes and ecosystems in the terrestrial and marine environments. Many of the questions posed in the watershed studies have parallels for ecological units that are not watersheds. Critical to this work (and perhaps even to the watershed work), is the mapping of ecological units below the eco-region level: eco-districts, for example, hat have been used in Europe and Canada. Such work recognizes the differential sensitivity and susceptibility of the units to land use and management. In addition, such analysis can also inform the suitability of the land and water units for particular uses—important for forecasting and evaluating effects in the region.

Section A.1

A.1.1—Turn the sentence around: "Build on and coordinate existing efforts to implement a Sound-wide vision for protecting the Puget Sound Ecosystem while accommodating population and economic growth."

More to the point, however, is that the statement as written is a classic example of "goal dissonance". Two competing and sometimes mutually exclusive goals in a single sentence that often make one or both of the goals virtually unattainable. This section is not the place to include population and economic growth objectives set against ecological ones.

A.1.2. This is an excellent idea but it should be focused on ecosystem protection rather than habitat protection. Some useful decision support systems already exist and have been used by federal and state agencies, and by private conservation groups such as TNC and the TPL.

A1.3. Nice work. Much of the work from the Chinook recovery planning effort can and should be used here.

A.1. Near-term actions

#2 Give the same weight to protection as you have given to growth and economic planning.

"Convene a regional scientific and planning forum to create a coordinated vision, criteria for selection, and a decision-making framework for acquiring, protecting, and managing high-value ecosystems."

A.2
Permanent protection is a laudable and necessary objective for ecologically important lands. Just a couple comments:

1. Even the protection of intact habitat (characteristics of?) is unlikely to result in a "system" of protected areas unless the system can be envisioned beforehand. Without such a system perspective (a hallmark of the ecosystem approach), most acquisitions will tend to be opportunistic, isolated and generally too small to be self-sustaining. A systems approach can identify both the lands and waters worthy of protection and those that must be restored or managed to provide linkages among protected areas and buffer the protected areas from external harm. A systems approach is particularly critical to marine areas. The current approach has tended to be largely idiosyncratic and habitat-based resulting in widely dispersed units that are generally too small and too isolated to reflect controlling processes and provide sufficient protection to internal, much less to larger scale functions. A systems approach is critical to provide some assurance of ecosystem resilience in the face of continued use and especially, climate change. This approach is necessary for terrestrial, freshwater, and marine ecosystems. Developing such an approach should rely on the three "Rs" of conservation: Replication, representation and resilience as articulated in "Biodiversity of the United States" by the TNC and others.
2. Regulations are a poor tool for permanent protection of ecologically important areas. Generally, a variety of variances and exceptions are applied to address property rights issues. These variances result in a steady chipping away at the areas followed by a reduction in ecological function. Generally, only federal statutory rules offer sufficient protections and, as we have seen recently, even those can be rather easily compromised.

A2.2. These recommended actions seem to be a bit too general to be useful.
A further attempt to specify what the agenda means by "assist", "work with FEMA", and "resolve" is appropriate here. It would also be useful to indicate Which jurisdictions will be the targets of this assistance?

A.3.
Flow management based on maintaining ecosystem process, structure, and function is a necessary corollary to the institutional changes called for in this section. If the ecosystem approach is the fundamental framework of the PSP action agenda, then that statement should be made in this section. This will make the revision of state water rules and regulations more complex and difficult but ultimately bring the law into alignment with ecological principles.

I suggest that the PSP investigate the many integrated watershed management programs in place throughout Europe, Africa and Australia. These programs seek to place water supply, flood management, and ecological function within a single conceptual framework that can be used as a touchstone by the many and varied agencies and users of the water resource. Working off a common understanding of the overarching goals of water management, and within a common decision system, even agencies with seemingly distinct objectives are forced to evaluate and implement their activities to achieve positive ecological outcomes (rather than just reduce harm).

A.4.

I am concerned that direct financial incentives for working lands may not be particularly effective in the face of declining markets and increasing competition from other regions and areas of the US and the world. Moreover, working lands that produce ecological value and economic value tend to require considerable labor by landowners in order to avoid the effects associated with industrial forestry and agriculture. Expectations of landowners may not be resonant with this level of effort or the returns from the effort. A larger effort to open regional markets to local products will be required to achieve the desired outcome. This will likely require subsidies and price supports to make local products attractive to the general consumer rather than those who can afford to pay the entire cost of such products (small farmer markets such as the one on Vashon Island are a case in point).
Furthermore, persistent stewardship depends less on economic incentives (the stewardship tends to decline along with the incentive) than it does on education and moral indignation at harmful practices. Creating the “ecological citizen” described by Aldo Leopold is necessary, in my estimation, to provide a basis for sorting right actions from wrong actions and developing an ethical approach to land management to replace the economic one that dominates the sector today. There are some excellent—though small—examples of this community-based approach in other areas of the nation: the Healing Harvest Forest Foundation of Virginia (some practitioners here in Washington), the Malpaso Borderlands Group in New Mexico, and the Clearwater Foundation on the Hudson River. Each of these depends, not on incentives as a first line of attack, but on appeals to community and sustainability, both firmer brick in the foundation of ecological citizenship than financial incentives.

A.4. Near-term actions

The use of an ecosystem framework can go a long way to resolving apparent conflicts between economic\ uses of land and ecological benefits. For example, in action # 2, the partitioning of land into agricultural activities and critical areas at a site scale will always result in conflicts due to the binary nature of the issue at this scale. By enlarging the question to an ecosystem or landscape scale, other questions emerge such as "in this ecosystem, what effects are likely to follow from this kind of agricultural activity? " This could be followed with further questions about the location and type of activity, or by altering the form of the activity or the management practices (of which the designation of a critical area is one type).

Priority B. Restore…

It is worth remembering in any restoration strategy or program of activities, that the ultimate goal of restoration is not simply aesthetic or physical or chemical, but rather biological. We restore in order to provide suitable ecological conditions for ourselves and for our fellow creatures into the future. This work has considerable importance for our (and their) evolutionary future. This requires that any restoration strategy have the necessary components of location, timing, magnitude, and sequence. It also requires that we have clear goals, objectives, and targets for the work, and that our evaluative criteria be equally clear. Ultimately the scale of restoration required to recover Puget Sound as a resilient ecosystem is probably greater than we imagine, even in this action agenda. The goal of this agenda that I find commensurate with that task is to organize restoration around community rebuilding. This may have had a parallel in the WPA and CCC of the '30s but it seems a suitable model for the work today, partly because it completes a circle of responsibility to ourselves and to the living world.

One word of caution, even in an ecosystem approach to restoration and protection, we should recognize the critical components of the ecosystem in need of work. We may be able, by dint of a bit more reflection, to find those ecosystem components that will start a cascade of outcomes that will carry through the system altering other structure, function and process as they go without further intervention from us. Salmon are one such component. Rather than consider salmon and the recovery plans as single species management plans, it is worth recalling the important role of salmon in the riverine ecosystem of the PNW and in the estuaries and marine ecosystem as well. Salmon recovery, if successful, is ecosystem restoration and is likely to cause a ripple of effects that we may be unable to predict precisely but should welcome.

Priority D.

D.1. Perhaps a first step in crafting an integrated planning and implementation framework is to provide a common basis for applying planning and implementation decisions. By this I mean taking the ecosystem approach called for and making the principles understandable and explicit to all participants. Like any coherent framework, some actions and activities fall within the framework while others clearly fall outside. The framework should instruct us about both kinds of actions. Developing a common understanding will go a long way toward integration. Next, craft a common view of the

ecosystems of interest so that all are working across a common landscape. The watershed analysis called for will be helpful here but not sufficient. A common geography of ecosystem types and characteristics will be necessary also. Third, even though the goals and objectives of each participant are likely to be different, a set of over arching goals and principles will help to avoid conflict over primacy of individual goals. For example, the goals to recover Puget Sound should form the basis for all activities and actions by planning and implementation agencies. This does not mean simply a reduction in harm or the simple avoidance of harm, but a demonstration of the recovery content of actions. Furthermore, use of guiding principles such as the Precautionary Principle is equally necessary. This will require a clarification of values and an acceptance of a common culture of recovery by the various agencies and institutions involved, not a task for the faint-hearted.

D.1.4. This action should be reduced to its most basic form without the subversive compromises of the current sentence*:"…fishing and hunting harvest rates based on ecosystem needs."* Further qualifications will only reduce ecosystem sustainability over time and is little different from the current approach.

D1.6. I suggest "Manage hatcheries and other artificial propagation methods in a way that is consistent with ecosystem and evolutionary principles."

D2.3. Climate adaptation strategies owe no particular allegiance to the watershed assessment as it is presently envisioned. If anything, climate strategies might use an eco-regional geography coupled with landscape geography as a basis for adaptive and mitigative strategies. A further component of any credible climate strategy should be carbon sequestration. This will run hand in hand with protection and restoration strategies, especially in terrestrial landscapes but also in riverine and wetland ecosystems. Many public lands throughout Puget Sound, having been modified through decades of forestry and agriculture, are quite suitable for soil and vegetation enhancements that could store significant amounts of carbon.

D.3. In this section, it is important not to fall for a kind of unity fallacy that envisions all agencies working together seamlessly for the good of Puget Sound. The clarification of roles in this effort cannot proceed *a priori* but rather must be developed based on the authorities, responsibilities, and interest of each participating party. One cannot ask, for example, for a tribe to assume the same position in decision-making as a county or a city, or for a federal agency charged with endangered species protections to assign that authority to another non-federal institution. Some responsibilities and authorities are established by law and are unequal and undeniable. The first step to forming an integrated institutional approach to Puget Sound work is to understand the reach and breadth of the such authorities and responsibilities and form roles from that cloth.

D.4. I agree that the regulatory system is fragmented and inconsistent. But the institutional failures, as great as they are, have often grown out of competing and inconsistent goals rather than the unwillingness of agencies to take a large view. Once again, a common ecologic framework, overarching goals and principles that are

consistent and embedded in the higher level authority will go a long way to making a coherent system despite the idiosyncrasies of each agency. As an example, having national biodiversity and ecological goals into which regional and state goals, and local goals fit would help this problem. Perhaps the Partnership can act as an intermediary in creating some coherence out of chaos here.

However, the current regulatory system tends to be inadequate, in large part, because it does not recognize the spatial and temporal variation across landscapes and ecosystems. A system of "context-sensitive" regulations, tailored to ecosystem characteristics, suitability, and sensitivity, and reflective of the effects of the landowner's proposed actions would be far more capable of handling the variation in ecological characteristics and providing greater assurances than the existing system that, while administratively easy, is not robust to ecological process and function in most cases.

D.4.1.6. Reconciling flood management with ecosystem management at the scale of levee maintenance is too little too late. It is the nature of a levee to alter, modify, and otherwise halt a particular process or suite of processes of the river upon which the ecosystem depends for its sustainability. No amount of re-vegetation, or woody debris placement along the modified reach will address the fundamental alteration of the larger scale process and function that has been lost. In order to achieve some reconciliation, we should use the watershed analysis and the salmon recovery plans to understand the spatial arrangement and extent of the processes and functions necessary for Puget Sound recovery, and then use other tools such as buyouts or setbacks to achieve the ecosystem ends. Failing that, we must recognize that the ecosystem has been compromised and will lose some function. The importance of that function to recovery will have to be determined, ideally prior to taking the action. Moreover, we should use the analyses at the PS scale to determine where such modifications to rivers (and shorelines) is too damaging for ecosystem protection and maintenance, and use other tools to reach our socio-ecological goals in those places.

To always assume that such actions are mitigatable and therefore without consequence is to misapprehend ecosystem management and allow for further degradation and the further erosion of sustainability. Such trade-offs are almost without fail damaging to the ecosystem. A simple trade-off approach invariably leads us to accept a damaged outcome, telling ourselves that it is "better than it would have been". But ecosystem management is not a win-win proposition. When we make decisions that extract or modify an ecosystem and reduce its resilience, we are doing our descendents and ourselves no favors.

D.4.2.3. Be cautious of fee-in lieu programs. Most do not recognize the non-transferability of process and function across ecosystems, except in rare cases. There are always spatial components to ecological process, structure and function and, in most cases; a transfer of that function is unlikely to result in an equal ecological benefit. In many cases, the fees from such programs have been used to purchase other habitats or lands of ecological value that were at risk. Nevertheless, as useful as that seems, there

will still be a net loss of ecological function. The assumption that seems to drive such programs is that the loss of the ecosystem or habitat is inevitable and that we might as well get something more “valuable” for it. Not a reliable assumption in my estimation.

D.5. I would add to these an action to increase the number of field agents with management knowledge to act as advisors and technical support staff for landowners, much like the Conservation District agents or the NRCS (old SCS) agents. There should be no charge for such advice and these field staff, through their contact with citizens, would likely increase trust and compliance better than almost any other remedy. This should be modeled on the original SCS formula during the years just after the Dust Bowl.

D.5.3. Although customer service has become a watchword for government, there is no evidence that training employees in customer service leads to an increase in compliance or effectiveness of regulations. What evidence there is that seems well grounded, is that knowledgeable employees, well trained in the goals, objectives and requirements of the regulatory framework are far more effective at meeting the demands of citizens when it comes to regulations. If the provisions for education and training are considered customer service, then I’m all for it.

E. The management system.

E.2. In any funding strategy robust to ecosystem management, a contingency fund must be established to account for the inevitable surprises that occur when working in ecosystems. Too rigid a funding strategy cannot adequately account for the rescue of a population that has been struck by an unanticipated event whether natural or man-made. There will always be unanticipated accidents that scuttle the best-laid plans and there must be some method to account for them in a funding strategy.

E.3. To the agenda, I would add a mapping item to define and describe the ecosystem units, their attributes, and the ecosystem and landscape boundaries of interest to the particular questions posed. One should not assume that an ecosystem measure is robust across so large an area as Puget Sound; more attribute-based measures may tell more than general measures. Context is important, both spatial and temporal, in ecosystems and landscapes.

E.4. You have omitted some useful and important programs and institutions from you education strategy. The Seattle Aquarium has considerable experience in Puget Sound education and outreach and commands a much larger audience through its attendance than any other program or institution listed. The Beach Naturalist Program has been quite successful as well, along with th3e Cedar River Naturalists; both are worthy of emulation, I think.

But you will need far more than the programs and activities you have listed here just to get the message of Puget Sound out to the citizens who live in this ecosystem. For that you will need a savvy PR firm who can craft a message of immediacy and hope at the same time.

As for the near term actions, I see no need to produce any “pilot” programs such as the one envisioned for the Washington State Ferry system. There are considerable and varied programs, posters, educational materials, etc. that could be placed on the ferry system immediately. There is no reason to wait or proceed cautiously with the message about Puget Sound. Education is our best and brightest hope for this work, get on with it.

PugetSoundPartnership
our sound, our community, our chance

From: John Gagnon

Comment: Dear Puget Sound Partnership,

Thank you for your hard work to develop a draft Action Agenda to restore, protect and recover Puget Sound to health by 2020. It could not come at a more pressing time, especially for the Sound's iconic and endangered orca whale. Just this month, researchers reported seven orcas "10% of the Puget Sound population" are missing and believed to be dead. Some experts say dwindling populations of endangered Chinook salmon are at least partly to blame. Is this a sign that our ecosystem is on the verge of collapsing?

The urgency of restoring the Sound to health is at a tipping point and missing orcas are the Sound's "canaries in the coal mine," telling us we are running out of time. But there is hope for the orca, as there was hope for the bald eagle, the California Condor and others on the verge of extinction. The Puget Sound Partnership's Action Agenda is a golden opportunity to do what has not been done for over 20 years- develop and implement a recovery plan that is accountable, effective, transparent and decisive with sustained funding to restore this national treasure to health by 2020.

The draft Action Agenda includes many of the essential elements that need to be done:

-Require low-impact development to reduce stormwater pollution;

-Prohibit new bulkheads near feeder bluffs and forage fish spawning beaches;

-Fund local governments to develop and carry out shoreline master programs;

-Fund enforcement staff at state agencies and local governments;

-Implement specific, aggressive cleanup plans for polluted waters, including TMDLs;

-Fully fund a permanent year-round rescue tug at Neah Bay for oil spill prevention;

-Acquire critical intact parcels for habitat protection and conservation;

-Set strong requirements for water quantity, such as setting in-stream flow for all major rivers.

BUT, more than a list of Soundwide and Action Area-specific actions, the Partnership must create a real 2020 Action Agenda, not just a 2-year plan, that clearly identifies the specific actions that are needed over the next 12 years and the HOW and WHO and BY WHEN each action must be completed. All the actions need to be tied together into a comprehensive plan with measurable benchmarks and timelines in order to achieve recovery by 2020. The final Action Agenda must:

-Clearly identify timelines and responsibilities;

-Identify adequate and sustained funding for the long haul;

-Be a visionary and long term plan;

-Be based on science;

-Offer a comprehensive and robust program to prevent all sources of stormwater pollution, not just municipal stormwater;

-Strengthen the list of actions for toxic pollution prevention;

-Set meaningful standards for habitat protection;

-Balance regulatory change with land acquisition to accomplish long term recovery goals;

-Expand the indicator species to include more than just salmon, i.e. forage fish, harbor seals, etc.

The Partnership staff, the Leadership Council, Ecosystem Coordinating Board, Science Panel and stakeholders throughout the Sound deserve praise for the monumental effort involved in producing the draft Action Agenda. The next step is secure much needed funding. The 2009 legislature must adopt new funding sources dedicated to the recovery of Puget Sound by 2020.

For Puget Sound!

From: Theresa Gandhi

Comment: Thank you Action Team and all those who have put in thousands of hours to bring forth the Action Agenda, vision and goals of the Puget Sound Partnership. It is obvious that many people, organizations and governmental agencies have put a great deal of thought and work to bring it to this point. Now the real work will begin.

Our intimate experience of working to lessen and or eliminate the toxic chemicals that WSDOT applies next to wetlands, headwaters, streams and bogs along SR525 and SR20 on Whidbey and Camano Islands have exposed us to the mentality that “this is just the way it is”. The use and stopping the use of these chemicals are not addressed in your Action Agenda.

This means there is a huge dinosaur in the middle of Puget Sound that no one has addressed. WSDOT, WSDOA and permitted by WSDOE hundreds of thousands of gallons of toxic chemicals are being put uphill, up stream and directly into Puget Sound by these State Agencies. Additionally Puget Sound Counties apply RoundUp® and other toxic formulations for roadside vegetation control. I have several years of spray records for WSDOT routes in the Counties surrounding Puget Sound but no volume of what the Counties are doing. Farm chemicals promoted by WSDOA also find their way into Puget Sound and Hood Canal. In combination with phosphates these decrease oxygen.

Additionally hundreds of thousands of gallons of these chemicals are sold for use with the permission of WSDOA for farm and home use to control noxious weeds, make lawns green, moss free and eliminate any bugs that interfere with perfect plants. I have seen store bought chemicals applied at the water edge of streams less than 100 feet from Puget Sound.

My concern is that major issues that I have brought up have not been addressed by the Action Agenda of the Puget Sound Partnership especially when I have put them to Governor Gregoire in a letter dated January 17, 2006 with no response and a second letter, no response. And again at a Puget Sound Forum on Toxins in Puget Sound at Town Hall April 5, 2006 where I spoke at the microphone with my oxygen tank in tow to Jay Manning, Directory, Department of Ecology and Co-Chair of the Partnership asking a question and raising an issue that is no where to be found in your proposed agenda. There was no response on how to decrease and or eliminate this practice from Jay Manning or DOE.

This does not cover the hundreds of thousands of gallons or pounds, depending upon formulation, of herbicides that are applied by WSDOT for roadside vegetation control next to Hood Canal, along rivers, bays, lakes and on the roadsides along Puget Sound.

Just before April 1, 2002 when all three Island County Commissioners voted to end herbicide use in Island County I spoke with Doug MacDonald, Secretary of WSDOT. As requested I sent him a packet with a cover letter, three page abstract, three page bibliography, 2,000+ signatures on a petition to end spray and 175+ pages of peer review scientific documents showing the "gender bending" properties of RoundUp® and other toxic chemicals that WSDOT uses on all state routes. When Ray Willard commissioned an EIS of the chemicals WSDOT got all of their input directly from the chemical corporations and did not address the issues of "gender bending" aspects raised in the studies submitted.

Explaining to DOT that guard rails above steep slopes were most often above Critical Areas and that their chemicals migrated down hill, down stream and into Puget Sound was dismissed as the alternative being too costly. Because of our work here in Island County educating WSDOT they have greatly reduced that amount of herbicides used on our islands. Additionally Ray Willard tells me that WSDOT has stopped applying RoundUp® to the pavement edge on all state routes.

Demark has banned RoundUp® from their Country as the chemical has been found in their drinking water migrating much faster than Monsanto said it would. New York State has banned advertisement of any Monsanto product in their state because of false advertising. This list of diseases directly linked with these chemicals affects aquatic life and human life. The primary problem with them and other classes of chemicals is that they are "gender benders" affecting all life that hopes to reproduce. Endocrine disruptors change parts of the sexual reproductive organs of multiple species.

DOE authorizes chemicals to be applied into the waters of Puget Sound and its supporting watersheds in accordance with the Aquatic Noxious Weed Control NPDES General Permit. Under this umbrella there are seven permits that cover the use of pesticides (used to also mean herbicides) in and around water. These permits are:

• Aquatic Noxious Weed Control General Permit

• Aquatic Plant and Algae Management General Permit

• Aquatic Mosquito Control General Permit

• Irrigation System Aquatic Weed Control Permit

• Invasive Moth Permit

• Fish Management Permit (mass kill of unwanted fish to plant wanted ones)

• Oyster Growers Permit.

DOE provides DOA (Department of Agriculture) and DOT (Department of

Transportation; neither was on Acronyms list.) with permit coverage under both the Aquatic Plant and Algae Management General Permit and the Aquatic Noxious Weed Control General Permit.

The assumption of DOE and County Noxious Weed Control Boards is that the only way to eliminate, as an example, Spartina is to yearly apply Rodeo® and now Imazapyr® to low flow exchange bays. If it worked it should be a one time application but it does not work and every year the toxic chemicals are put into our water ways and we wonder why reproduction among crabs, herring and other key food chain aquatic life is down.

Hand digging Spartina and the roots at low summer tides does work as we have shown here on Whidbey Island at Scatchet Head.

November 21, 2006 in a letter from David C. Peeler, Water Quality Program Manager at DOE I was informed that a risk assessment is updated every five to seven years and that their was no mention of the "gender bending" properties of the chemicals they use that my 175 pages of peer review scientific studies has shown to be true. I can understand how this came to be.

Unless and until these laws that mandate toxic chemical use are changed aquatic life will continue to diminish until it is no more. I know of no way to remove glyphosates and the 87% to 97% of the volume of the so called "inert" ingredients in the formulations that are more toxic than the "active" ingredient.

The Environmental Impact Studies that WSDOT and WSDOE have performed should be rules null and void as neither looked at the science on the "gender bender" aspect of the chemicals used in key parts of the Puget Sound Basin, its watersheds, waterways, roadsides and Puget Sound itself. Any idiot should know by now that chemical corporations are not in the business of revealing that their chemicals might cause harm. It is less than responsible for WSDOE, WSDOA and especially WSDOT, who had in hand the scientific studies proving this harm does in deed happen to multiple life forms especially salmon.

The Puget Sound Partnership's Action Agenda needs to include ways to stop this major source of pollution and life threatening practices by what ever agency, governmental department or individual by changing the law that mandates it and find alternatives. To not do so will see a dead Puget Sound within fifty years. The oceans have been given a death sentence time of forty years.

Another aspect of the Action Agenda that was not addressed is the individual Counties creating and adopting their own Growth Management Act, Critical Areas Ordnance and Wetland Regulations. If Island County is an example then the preservation of existing wetland is doomed to failure. If watersheds and wetlands are not intact and healthy then

Puget Sound will die.

For the past decade and more republican developer minded County Commissioners have had as the person who wrote the Critical Areas Ordnance and Wetlands Regulations a former developer named Keith Dearborn. In challenging the Growth Management Act as written by the county through the Hearings Board, courts and when the Court of Appeals ruled the County out of compliance they went to the Supreme Court that referred the County back to the Court of Appeals ruling. This cost the tax payers over $2 million and could not have been done if not for the Whidbey Environment Action Network's ability to raise huge amounts of money to go through all of these courts to get a GMA that was not written so developers could do what ever they wanted.

Keith Dearborn then wrote the Wetlands Regulations that he is quoted as saying in the South Whidbey Record, "All wetland buffers will shrink in size." In the regulations is a statement: "No development will be disallowed because of a wetland." Included in the regulations the terms "Practical" and "Reasonable" will guide all decisions. What is "Practical" and "Reasonable" for a clear cutting timber baron is not what is "Practical and Reasonable" for a Chinook salmon. The near shore of Whidbey Island is Chinook salmon habitat.

One proposal that has been winding its way into getting approval is a floating pontoon bridge floating upon the Maxwelton creek and wetland so that 64 homes can be built upon a slight hill surrounded by wetlands and unable to support any other form of roadway. The regulations as written could allow this if the "reasonable and practical" for the developer justification is used.

Besides the Planning Department pushing this through the big insult was when a Commissioner (Mac) spoke with the Governor who spoke with someone at the Department of Community Trade and Development – CTED who wrote a letter praising Island County's new Wetland Regulations. Any government body that has the words TRADE AND DEVELOPMENT in it should not be the agency signing off on preserving wetlands and watersheds. The approval system in place is wrong headed and will see wetlands shrink and salmon disappear. This is an Action that needs to be taken to change the process.

I'm sure that other counties where they do not have the focused work of a group like Whidbey Environmental Action Network – WEAN have less than effective Critical Areas and Wetlands regulations. Especially when CTED holds Island County up as an example of well written Wetlands Regulations. The Wetlands Regulations and Critical Areas Ordinance are not written to be in line with the Action Agenda's call that all remaining wetlands not shrink or be diminished.

The Legislature and the Governor agreed upon six goals for the Partnership to achieve by 2020. Goal number d or 4 if numbered, calls for: A healthy Puget Sound where freshwater, estuary, near shore, marine, and upland habitats are protected, restored and sustained will not be achievable if toxic chemicals continue to be put into the near shore, next to estuaries and into upland habitats. And goal number f or 6, …….waters in the region are safe for drinking, swimming, shellfish harvest and consumption……..and are not harmful to the native marine mammals, etc. of the region. Can not be achieved as long as state law mandates toxic chemicals to be used that reduce reproduction ability of multiple species, salmon and

humans included.

Asking the question: “How healthy is Puget Sound?” without testing for the presence of persistent pollutants such as pesticides and herbicides and their “Trade Secret” ingredients that last longer than the active ingredient, gives false hope and leaves in the waters unseen and not smelled life killing chemicals.

These is now and has been for the past decade scientific documentation of the connection between pesticides/herbicides that disrupt the endocrine system (hormone system) of salmon, wildlife and humans resulting in: testicular atrophy, penile dysfunction, elimination of male genital and lower sperm counts, non-Hodgkin lymphoma, asthma, Lymphoma, congenital anomalies, miscarriages, Attention Deficit Hyperactivity Disorder, Parkinson’s disease, Multiple Sclerosis, Multiple Chemical Sensitivity (MCS), depression and violent behavior in children. These chemicals are referred to a being “gender benders”. This is what DOE and DOT ignored when they commissioned an EIS on the chemicals being used.

Under question 2 in an Action Agenda measure for restoring eelgrass beds by 2020 will need to see the elimination of toxic chemicals used on Spartina clumps where crabs and others make their homes. More long term damage will result by the repeated use of these persistent pollutants. The continued and repeated use with not a satisfactory result or they would not have to be used year after year after year is a Primary threat to the health of Puget Sound.

A major portion of my life these past seven years has been focused upon the science that proves harm, communicating to alert others of the danger, organizing a community to stop their use by our County and to decrease the amount used by WSDOT in Island County and across the state.

I spent my childhood in the waters of Puget Sound swimming within 300 feet of the fuel depot at Manchester, as an adult sailing Puget Sound, the San Juan and Gulf Islands of British Columbia. In 1980 I prepared a bibliography of the Economic Vialability of the Marine Resources as an alternative to the Northern Tier Underwater Oil Pipeline. The value of our marine resources has only increased in value and we are on the edge of losing it forever. Hood Canal’s dead zone is a huge alarm bell we must respond to.

Sailing without a motor I learned of the speed and force of the tides. This knowledge along with learning that Victoria, B.C. discharges into the Strait of Juan de Fuca 34 million gallons of untreated sewage per day has me greatly alarmed. The tides rip into Puget Sound from the Strait at eight knots which makes Victoria up stream of Puget Sound. No where is this addressed and it must be or fecal coliform will continue to affect the life in and around Puget Sound.

Under “Guiding Principles for Ecosystem Management in Puget Sound” Sections A. 3 – A. 4, speak to the need to implement and coordinate watershed based water management strategies. I could not find any mention of sole source aquifers such as exist in Island and San Juan Counties. Island County has over 15,000 well water districts where individual wells or community wells are managed by residents. The aquifer beneath the island has not been mapped as to its capacity and development minded Planning Department and Commissioners have approved many McMansions, even one in a historical preserve with strict rules against such buildings. Over 150 known wetlands have been paved over or filled

and built upon in Island County. We have the list.

Under A.4 Near-term Actions # 3. “Support Conservation District’s efforts to protect productive agricultural areas consistent with the Action Agenda priorities.” There is a problem with this in Island County (long history of commissioners slandering and putting farmers against conservationists to punish those who would challenge their “development dream” GMA) because the county and then Senator Haugen at the request of a commissioner (Mac again) got a law made that made all actions and farm plans secret and not available for public review. This allows farmers to violate the GMA, Critical Areas Ordnance and Wetlands Regulations without anyone finding out about it as it only needs to be reported to the now secret Conservation District.

Under B.3 Near-term Actions to reduce the sources of water pollution are silent on the toxic chemicals applied by WSDOA, WSDOT and permitted by WSDOE. The laws that make this possible need to be changed and new ways of eliminating noxious weeds aquatic or land based need to change.

Under C.2.3.2 Near term Actions. “Fund and implement voluntary incentive, stewardship and technical assistance programs……..” One of the great challenges in Saving Salmon as the Salmon Plan for WIRA 6 (Island Co. + I believe is 6) states that the developer and land owner are the ones responsible to Save the Salmon. But there are no funds or methods to inform those of their responsibility.

There is a program and process that I have been involved in that could be adapted for educational and enrollment of the population to have “ownership” is seeing positive changes envisioned by the Partnership to come about.

I believe that the format, a yearly newsprint workbook outlining eight topics to be discussed over eight months with background material and questions for discussion laid out for use in small groups gathered in libraries, community halls, granges, etc., could educate and motivate the public to have ownership in saving Puget Sound. There is a way provided to write up the suggestions and answers to the questions and submit them to a central place, like the Action Agenda, to be summarized. Then the hundreds of these summaries can be combined and reported back to the groups the next year when they meet to begin again with eight additional topics.

The Great Decisions Study Groups were run by Universities and the Foreign Affairs Council. Just Google to find the complete info.

Please work to get a law made to eliminate all plastic ropes and fishing nets. These have created “ghost reefs” that kill marine life. It used to be a crime to not grown hemp for ropes when our republic was first formed.

I have a few more things to write about and I would love to edit what I have written and include supporting documentation but it is now 4:48PM on November 20, 2008 and by the time I e-mail this it will be deadline time.

Thank you for this opportunity to contribute. I would have done more in person but as a health challenged Hanford downwinder I live as a hermit as my immune system is not strong. I care deeply about Puget Sound and all of its supporting water ways and preserving it in

good healthy working order for our seventh generation.

I have six + file drawers plus hundreds of files on my computer that support what I have submitted. I am a resource please use me.

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What is Great Decisions?

Great Decisions, a program that includes an annual briefing book and discussion groups, engages citizens in learning about their world. The program is arranged each year by the Foreign Policy Association and offered through IRC.

How Does It Work?

The program model is based on participants developing an informed opinion by reading the text in the briefing book and sharing those opinions in a discussion group forum. Each discussion is lead by a Discussion Group Leader. However, participants play the most important role, and their interest, enthusiasm and commitment ultimately determine the success of the group. Participants should consider this discussion group as a "safe" environment because it provides everyone with the opportunity to speak. Each participant's point of view carries equal weight and everyone is encouraged to share opinions and ideas.

Where Do Groups Meet?

Meetings take place at homes, schools, community centers, churches and libraries. Any individual with an interest in expanding his/her knowledge of international relations as well as engaging in active discussion of crucial global issues is welcome to join. IRC facilitates several groups throughout the Kansas City area. View 2008 groups here. Updated information for 2009 is coming soon.

What Are the 2009 Great Decisions Topics?

The 2009 topics are: The U.S. and Rising Powers, Afghanistan and Pakistan, Energy and the Global Economy, The Arctic Age, Egypt in the 21st Century, Global Food Supply, Cuba After Castro and Universal Human Rights. For more detailed descriptions of the topics, visit the Foreign Policy Association's website. You can also preview the topic "Egypt in the 21st Century" by reading the Foreign Policy Association's Egypt blog.

How Do I Purchase a Book?

Great Decisions books are available through IRC. The 2009 briefing books will be $16 without delivery (pick up in the IRC office) or $19 with delivery. IRC will also offer Great Decisions 2009 DVDs ($40) and Teacher's Guides ($28).

Questions? Contact Sarah Bader at irc@irckc.org or 816-221-4204.

THE INTERNATIONAL RELATIONS COUNCIL, 911 MAIN STREET, SUITE 2226, KANSAS CITY, MO 64105 816-221-4204 phone, 816-221-4206 fax

Wetland's Salmon Mitigated Away

I'm a fish out of a wetland, my children will die
with no stream water to grow my fry.
Salmonid, my babies, can't live downstream
if wetlands are bulldozed away.

Gone by way of development stamped okay.
Practical you say, reasonable okay
to kill my kind, you pave and slay.
Do you not know the cost to you, under the ESA?
$15,000 - $25,000 for each salmonid, without habitat
protected today by Federal law, the ESA
is the cost to progress, so the law says.

Progress paved over, the sources that fed
so many streams, that are now dead.
In the past Island County shorelines were fed
as uphill wetlands fed the streams
that are lost to memory – now a Dairy Queen.

So King Salmon, Chinook my kind
are an Endangered Species, because development holds sway
over stewardship of what, was our birth ways.
These regulations you would codify
will kill us faster than you do today.

Your planning process has ignored the call
from our Governor to save Marine life for a future day
by saving existing wetlands, no matter the cost
or Puget Sound and all who live in it will die and be lost
no salmon, no herring, no whales, no way
if the source of our lives, your wetlands
are mitigated away.

I spoke the above poem on behalf of salmon to the Island County Commissioners January 7, 2008 holding a cloth stuffed Chinook salmon. Chinook's habitats are the shores, streams and wetlands of Island County that are sustained by viable wetlands. Chinook are listed as an Endangered Species. The proposed wetland regulations will adversely affect the salmon and its habitat. This is a violation of the ESA.

Island County's WIRA 6 Salmon Plan makes the County, developers and landowners responsible to save our salmon. No program or funds are designated to do so.

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www.tmgandhi.com www.tmgandhi.blogspot.com

From: Ray Gardner

Comment: Dear Leadership Council,

Thank you for the opportunity to comment on the Puget Sound Partnership Draft Action Agenda. I appreciate the tremendous amount of work that has gone into developing it and I support the strong list of measures that, if implemented, will go a long way toward recovering Puget Sound by 2020.

The draft plan includes a few omissions. The final plan should include Outstanding Resource Water (ORW) designation under the Clean Water Act as a tool to help protect rivers and other aquatic habitat. While I strongly support the inclusion of Wild and Scenic designation as a similar tool, in some cases ORW designation will likely prove to be a better, more immediate way for the state to ensure the protection of high quality rivers and other waters. Therefore, I urge the Partnership to include support for the Outstanding Resource Water designation as one of its "Near Term Actions." ORW designations permanently protect high quality waters that are ecologically significant, provide cold water refuges for fish, and/or support important recreational values. Many rivers in the Puget Sound region are eligible for ORW designation.

I would also like to encourage you to include funds to move up the removal of the two dams on the Elwha from 2012 to 2010. Removal of the

Elwha dams is one of the best chances for salmon and steelhead recovery in the region as it will open up over 70 miles of prime spawning habitat. Removing these dams has also been as a key action to recover our Puget Sound's orca population, which is malnourished thanks to a lack of chinook salmon.

Especially during difficult financial times, finding opportunities for economic benefit and job creation is important. Removing the Elwha dams provides a tremendous opportunity for creating "green jobs" and numerous other economic benefits.

Thank you for taking my comments into consideration.

From: Michael Garrity

Comment: Dear Leadership Council,

Thank you for the opportunity to comment on the Puget Sound Partnership Draft Action Agenda. I appreciate the tremendous amount of work that has gone into developing it and I support the strong list of measures that, if implemented, will go a long way toward recovering Puget Sound by 2020.

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Especially during difficult financial times, finding opportunities for economic benefit and job creation is important. Removing the Elwha dams provides a tremendous opportunity for creating "green jobs" and numerous other economic benefits.

Thank you for taking my comments into consideration.

From: Julie Garrod

Comment: I commend your efforts and the willingness to find a solution for our sick Puget Sound! However, if you want the citizens of our great nation to respond to the issues of our sick waters, you must touch their hearts on issues that hit closer to home. The Orca is very important! But, the average individual does not see how that affects them. We must include in our discussion how our sports, our fishing, our swimming and transportation of goods, could be at risk! And the sea off limits! If measures are not taken to stop the poisoning of our most valuable resource, Water. It can not be stressed enough that The Puget Sound could become off limits for us to enjoy, for recreation and for our livelihood. Education must be employed in our school system. There is no better place to teach the next generations how to take care of the land, so the Waters are not destroyed! A curriculum must be brought into the public school systems at once, to teach this agenda. With the help of our fish and wildlife experts and the many environment groups already in place, that have teaching resources, I feel this is a very doable task we can take on.

From: Sam Garst

Comment: Dear Puget Sound Partnership,

I am writing to urge you to improve your action agendas recommendations on pollution prevention.

From: Lydia Garvey

Comment: Dear Puget Sound Partnership,

Thank you for your hard work to develop a draft Action Agenda to restore, protect and recover Puget Sound to health by 2020. It could not come at a more pressing time, especially for the Sound's iconic and endangered orca whale. Just this month, researchers reported seven orcas "10% of the Puget Sound population" are missing and believed to be dead. Some experts say dwindling populations of endangered Chinook salmon are at least partly to blame. Is this a sign that our ecosystem is on the verge of collapsing?

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The draft Action Agenda includes many of the essential elements that need to be done:

-Require low-impact development to reduce stormwater pollution;

-Prohibit new bulkheads near feeder bluffs and forage fish spawning beaches;

-Fund local governments to develop and carry out shoreline master programs;

-Fund enforcement staff at state agencies and local governments;

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-Fully fund a permanent year-round rescue tug at Neah Bay for oil spill prevention;

-Acquire critical intact parcels for habitat protection and conservation;

-Set strong requirements for water quantity, such as setting in-stream flow for all major rivers.

BUT, more than a list of Soundwide and Action Area-specific actions, the Partnership must create a real 2020 Action Agenda, not just a 2-year plan, that clearly identifies the specific actions that are needed over the next 12 years and the HOW and WHO and BY WHEN each action must be completed. All the actions need to be tied together into a comprehensive plan with measurable benchmarks and timelines in order to achieve recovery by 2020. The final Action Agenda must:

-Clearly identify timelines and responsibilities;

-Identify adequate and sustained funding for the long haul;

-Be a visionary and long term plan;

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-Be based on science;

-Offer a comprehensive and robust program to prevent all sources of stormwater pollution, not just municipal stormwater;

-Strengthen the list of actions for toxic pollution prevention;

-Set meaningful standards for habitat protection;

-Balance regulatory change with land acquisition to accomplish long term recovery goals;

-Expand the indicator species to include more than just salmon, i.e. forage fish, harbor seals, etc.

The Partnership staff, the Leadership Council, Ecosystem Coordinating Board, Science Panel and stakeholders throughout the Sound deserve praise for the monumental effort involved in producing the draft Action Agenda. The next step is secure much needed funding. The 2009 legislature must adopt new funding sources dedicated to the recovery of Puget Sound by 2020.

For Puget Sound!

From: Rochelle Gause

Comment: Dear Puget Sound Partnership,

I am writing to urge you to improve your action agenda's recommendations on pollution prevention. I want a healthy Puget Sound to be part of the legacy we leave our children.

Many Washington manufacturers continue to use harmful chemicals without any plans to switch to chemicals that are safer for Puget Sound. To protect public health and the environment, Washington's industry must begin phasing out of the worst toxic chemicals and developing plans to switch to safer alternatives.

Please include recommendations to help move Washington's businesses toward safer alternatives and away from chemicals known to be harmful to Puget Sound. These proposals should include:

Increasing the availability of technical assistance to help businesses reduce chemical use.

Developing a state program to focus on researching safer chemicals and materials.

Requiring better industry reporting to Ecology of the chemicals currently being used.

From: Dawn Gauthier

Comment: Dear Puget Sound Partnership,

The Partnership staff, the Leadership Council, Ecosystem Coordinating Board, Science Panel and stakeholders throughout the Sound deserve praise for the monumental effort involved in producing the draft Action Agenda. The next step is to finalize a plan that is accountable, transparent, effective and have dedicated new funding sources to the recovery of Puget Sound by 2020.

The Partnership must create a real 2020 Action Agenda, not just a 2-year plan that clearly identifies the specific actions that are needed over the next 12 years and the HOW and WHO and BY WHEN each action must be completed. All the actions need to be tied together into a comprehensive whole through measurable benchmarks that must be accomplished in order to achieve recovery by 2020.

Thank you for this opportunity to strengthen a strategy to save Puget Sound.

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From: Leslie Geller

Comment: Dear Puget Sound Partnership,

Thank you for your hard work to develop a draft Action Agenda to restore, protect and recover Puget Sound to health by 2020. When it comes to restoring the health of the Puget Sound, where and how we grow matters. Especially in light of the one million new residents the state expects to welcome by 2020. It's more crucial than ever to focus that growth inside

our urban areas so that we can preserve our farm and forest land and protect our rural areas to restore critical habitats and watersheds of the Sound.

While I applaud your effort thus far, the Action Agenda can and must go farther. We need a twenty year plan, not a two year plan. All the actions need to be tied together into a comprehensive plan with measurable benchmarks and timelines in order to achieve recovery by 2020.

As you finalize the final Action Agenda, please:

Balance regulatory change with land acquisition to accomplish long term recovery goals;

Take advantage of the region's recent vote to build 34 miles of new light rail - we must capitalize on this investment by requiring more intense development near these station areas that are pedestrian, bicycle and transit friendly;

Identify adequate and sustained funding for the long haul;

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For Puget Sound!

From: Maria Gerrald

Comment: Dear Puget Sound Partnership,

I've lived in Puget Sound area for 20 years. Over the years I have scuba dived and kayaked in the sound. Ive vacationed on the hood canal and enjoyed many of our beautiful beaches. The wildlife and ecosystems that make this such a special place need immediate attention. Please continue to protect this treasure.

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our sound, our community, our science

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For Puget Sound!

From: D Giles

Comment: Longterm and significant funding for the Soundwatch boater education program is essential for orca recovery. Soundwatch's mandate to promote responsible boating practices for vessels in the presence of orcas and other marine mammals allows specially trained Soundwatch personnel to interact with and educate thousands of people every year. Soundwatch also has the most extensive dataset describing trends in vessel densities and activities within the Southern Resident killer whale's core summer range, an invaluable source of knowledge that has been used to inform policy at the local, state and hopefully soon federal level. Public acceptance of and adherence to current and future boating guidelines will help minimize disturbance to killer whales in their summer range. Soundwatch is the best organization to promote best practices guidelines to the public both on the water and on land to, but to do so they will need guaranteed funding for the foreseeable future. Thank you for taking my comments and for taking on this huge endeavourer.

From: Greg Gille

Comment: Dear Puget Sound Partnership,

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For Puget Sound!

From: Tom Giske

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our sound, our community, our chance

Hi Bill,

I spoke to you at the public meeting of the Partnership in Kingston when the focus was on Hood Canal. I expressed my concern that the primary need for education and enforcement activities appeared to be lost in the structure of the priorities being set by the Partnership, and I agreed that I would send you a proposal outlining my ideas. So, here it is!

I am hopeful that much of what I suggest is already on the drawing board, and I'm sure it can be improved by more experienced minds than mine, but please remember the essence of my belief … the public must be educated … awareness that we have a problem is needed, but is not enough … people must know what they need to do – and not do.

But, educating the general public is NOT easy, as you well know. It must have a solid scientific base, and ask for reasonable sacrifice … and the return must be obvious from the outset. Such a program must also be common across the region … avoiding discontinuity among those doing the teaching – and the materials being used. Therefore, the Partnership is the natural vehicle for taking accountability to design, build and deliver an aggressive public education program.

I believe that the same is true for enforcement … so I have included some similar ideas in that area. In both cases, I believe the Partnership should take responsibility for creating the programs and funding the delivery, but that the actual delivery be undertaken by local teams … the Marine Resources Committees and Beach Watchers groups may be well positioned to deliver these programs, if they are given the materials and funding to do so.

I understand that the Partnership is creating a non-profit organization, which may very well be the right place for the Education Action Board I propose, and I realize that legislation would be required to create the Enforcement Action Board, but I strongly believe that enforcement without such a coordinating group will be ineffective.

In the midst of the wide range of things we can do, let's make sure we keep education and enforcement at the top of our priority list … the basic two **e**'s of saving our sound!

Thanks for taking your time to listen … and for your continued commitment to this vital effort.

Tom

To: Puget Sound Partnership

A Proposal for Education and Enforcement

Premise: It is reasonable to expect that 80% of the people who inhabit the Puget Sound region want to do the right thing ... the basic question is: "Do they know what is the right thing to do?" As for the other 20%, a lack of enforcement or the threat thereof, encourages continued damage to the sound. There is no need to debate whether these numbers are correct – only a need to agree that both segments must be addressed with vigor. Given that the primary threat to the sound is people, and their everyday actions; it is incumbent on any effort to save the sound that "education and enforcement' become the action agenda of highest priority.

Goal: To ensure that every citizen and business who might impact the quality of Puget Sound understands what actions will damage the sound and what actions will preserve or restore the natural habitat of its waters ... and to provide the means for local government to enforce existing regulations that protect the sound.

Objectives:

1. Launch a continuing public awareness and outreach program that combines TV, radio, and printed news releases with local community workshops supported by trained discussion leaders to alert people that we really do have a problem, and that they must be part of the solution.

2. Develop and implement a two-level comprehensive education program that:

   - Level 1: For everyone, simply but scientifically clarifies the issues with personal actions to take, and personal actions to avoid. (Focus on behavioral changes.)

   - Level 2: For those who are about to take significant impactful actions, at the point of action, supplies the details of the impacts, both harmful and beneficial, that will likely result from the choice of action taken.

   NOTE: The same two-level approach must be implemented for the business community, as well ... with appropriate variances by type of industry.

3. Create a Puget Sound Enforcement Fund, from which local governments can seek matching grants to finance the enforcement of existing laws and regulations.

Approach: Two 'Action Boards' will be established and funded by the Puget Sound Partnership, each with the delegated authority to create and implement regional programs, one focused on education and the other on enforcement.

The Education Action Board: This group of appointed citizens shall be supported be a staff of education and communications experts who will create and outsource programs to educate the public. These programs shall include, but not be limited to:

1. A clear set of guidelines for education development that specifies the format and level of content that must be used for all education to be funded by the Partnership.

2. A delineation of categories that, when combined, form a comprehensive view of what a citizen needs to know, and individually offer the opportunity for an in-depth understanding of the critical issues that must be addressed to restore and preserve the quality of the sound.

3. A Long Range Plan for educating the general public that addresses each of the delineated categories, including a strategy for meeting the education goals and objectives set forth by the Partnership, a list of program elements to implement that strategy, and the selection of education media for each such element.

4. The creation and publication of educational materials to implement the Long Range Plan, including self-study modules that can be easily obtained or accessed over the Internet.

5. An extension of the Marine Resources Committees as the execution vehicle for implementing the Long Range Plan and conducting educational programs at the local level.

6. A packaged meeting agenda, including notes on how to run the meeting and all the educational material required, for any local organization to run a "Save our Sound" workshop.

7. An assessment of the local government permitting process to identify "Action Points" where education is needed at the time of the action for citizens and developers to make the right choice … and the subsequent development of education material to distribute at each "Point of Action."

8. A list of authorized vendors for education development and a process for bidding requests for content proposals.

9. A process for local government and citizen groups to suggest or request, and to gain funding for educational content to address specific needs.

10. Creation of a "This Sound is YOUR Sound" web site with multi-media education material that motivates people to do the right thing, and includes simplified ways for people to spread the word among their neighbors (a la the Obama campaign and mudup.org), with appropriate links to other sites that add educational content for the user.

11. A publicized list of the "Top Ten Must Do" activities that individuals can do to positively impact the future of Puget Sound. (Publish a separate list for businesses.)

12. Creation of a "Sound Stamp" program to identify products at the point of sale that can be used without endangering the sound ... accompanied by a program to persuade local manufacturers and leading retailers to add the "Sound Stamp" to such products of choice.

The Enforcement Action Board: This group of appointed citizens shall be supported be a staff of enforcement experts who will help local governments obtain and train the resources necessary to assure appropriate enforcement of the laws and regulations in place to protect our sound. This program shall include, but not be limited to:

1. An index of all laws and regulations, organized by function and by geography, that have been put in place to restore and/or preserve the sound, published in a way to simplify enforcement activities.

2. A statewide training program for local government planners and enforcement personnel that highlights areas that need the greatest attention and motivates local officials to strengthen their enforcement activities.

3. Funding available, based on published criteria, to support matching grants to local governments who are prepared to execute pro-active enforcement programs.

4. Support and extension of the "Beach Watchers" program to cover all geographies of the sound and to identify violations that require enforcement action.

5. A training and outreach program to industry and trade organizations that clarifies which regulations will be enforced and how developers/builders can best adhere to those regulations.

6. An annual "Save the Sound" awards program that recognizes businesses who have 'led the way' toward practices that protect and preserve the sound.

From: Fred Giorgi

Comment: Dear Puget Sound Partnership,

Thank you for your hard work to develop a draft Action Agenda to restore, protect and recover Puget Sound to health by 2020. Although I do some restoration work for People for Puget Sound and have attended one of partnership workshops I the have not included their standard letter because I think your plan (which I did read) may be advocating spending money in the wrong places. Certaimly the immediate threats need funding to be contolled but the rest reads like a build up of science for the sake of science. There are several things i could say but to keep your interest I'll only include one.

I believe the plan does not significantly and directly influence change to the culture that caused the current condition.

Athough all scientific and stewartship efforts are good intentioned I see a big diconnect between this comunity and the general area population. That disconnect is one of the primary reasons the sound is in the shape it is. The general public does not understand the ecosystem or how their activities effect it. The industrial-sound relationship has either been one of exploitation of the waters, plants, animals and mineral resources without recourse or minimal regulatory compliance.

Each project should have its own systematic ability to effect change rather than projects acting as grants and allocation of responsibility to secondary organizations.

For example:

If we want communities to use organic fertilizers and pesticides there needs to be incentive for all involved. So say, kids get community service points for achiving an organic, invasive free certification in their neighborhood. They would be armed with coupons and tax rebates that residents can redeem for discount on recommended products and services. This would force the stores to carry such products and prevent the other stuff from entering the puget sound area in the first place. It would force landscapers to provide the proper services. People will naturally try to improve the quality of their homesites. All they need is a push in the right direction. Moreover the cost of a fully thoughout systematic solution is low compared to its potential effect.

Many of the systems this plan attemps to effect change in are way to big and complicated to fix with a few million bucks. Yes do the science but dont forget the social science!!

From: David Gladstone

Comment: Dear Puget Sound Partnership,

My wife and I are writing to urge you to improve your action agendas recommendations on pollution prevention, especially to provide greater protections for orca.

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For Puget Sound!

From: Marie Gladwish

Comment: Dear Puget Sound Partnership,

Thank you for your commitment to developing an Action Agenda for a healthy Puget Sound. From struggling orcas to toxic chemicals in our water, the Sound needs quick and decisive action today. I want to make sure we pass a thriving Puget Sound on to future generations.

I urge the Partnership to incorporate accountability, benchmarks of success, and ample funding into this Agenda.

The draft Action Agenda includes many of the essential elements that need to be accomplished, but in addition, the final Action Agenda must also:

-Amend the Cruise Ship MOU to ban all cruise ship discharges in Puget Sound;

-Prioritize the protection and restoration of the State's forage fish spawning beds;

-Complete the Management Plan for the Cherry Point Aquatic Reserve;

-Identify adequate and sustained funding for Plan implementation;

-Update the guidance for open water dredge disposal of PCBs;

-Expand the indicator species to include forage fish abundance and harbor seal toxics loading; and

-Accelerate the restoration of the Elwha River.

Thank you for your hard work to develop a draft Action Agenda to restore, protect and recover Puget Sound to health by 2020.

On behalf of everything from eelgrass to orcas.

From: Jim Gleckler

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From: Julia Glover

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From: Marcia Glover

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For Puget Sound!

From: Marcy Golde

Comment: Comments of Draft Puget Sound Action Agenda

1. This plan is too vague and needs more short term specific, measurable commitments.

2. Bioassessment needs to be added to the State's Water Quality Standards. The measurements of progress must be biologic, chemical and physical and must have deadlines for reaching those numbers in both the short term as well as longer term measurements. Depending on measurements in fish is a lagging indicator and must be supplemented by short term indicators of progress.

3. Stormwater discharges must be controlled and gradually eliminated. An aggressive timetable for this in the short term is necessary. LID must also become the standard in all new developments, and again annual reporting by counties and municipalities on the implementation is vital.

4. Wetlands and wetland functions must be protected and enhanced. Aggressive enforcement of all existing wetland regulations by federal, state and local jurisdictions would greatly reduce the level of losses. Each such jurisdiction needs to report to the Partnership annually, showing full implementation.

5. Existing exempt wells must be phased out, and all new ones prohibited. State and local jurisdictions need to report to the Partnership annually, showing their progress on eliminating existing wells, and that they have not permitted new wells without full review of water impacts.

6. Septic systems must be repaired and serviced, especially where nitrates have caused

reduced oxygen concentrations in marine waters. An annual progress report here is also needed.

From: Eleanor Goodall

Comment: Dear Puget Sound Partnership,

I am writing to urge you to improve your action agenda's recommendations on pollution prevention. I want a healthy Puget Sound to be part of the legacy we leave our children.

Many Washington manufacturers continue to use harmful chemicals without any plans to switch to chemicals that are safer for Puget Sound. To protect public health and the environment, Washington's industry must begin phasing out of the worst toxic chemicals and developing plans to switch to safer alternatives.

Please include recommendations to help move Washington's businesses toward safer alternatives and away from chemicals known to be harmful to Puget Sound. These proposals should include:

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Developing a state program to focus on researching safer chemicals and materials.

Requiring better industry reporting to Ecology of the chemicals currently being used.

From: Erin Gordon

Comment: Dear Puget Sound Partnership,

Thank you for tackling the enormous challenge of saving Puget Sound head on. We appreciate your boldness and your efforts to engage the broader community, to listen to us and to base your decisions on science.

Surfrider Foundation is committed to supporting your efforts, primarily by encouraging people to get out in the watershed and into the Sound, to enjoy it, to appreciate it and to take action to protect and restore it. Through projects like Rise Above Plastics, beach clean ups and ocean friendly gardens, we will do our best to promote Sound stewardship practices.

In order to make sure that we reach our goal of a healthy Puget Sound by 2020, we ask that you strengthen the Action Agenda by incorporating the following recommendations:

- Be stronger on water quality measures by offering a comprehensive and robust program to prevent all sources of stormwater pollution and strengthening the list of actions for toxic pollution prevention.

- Develop different indicators for human well-being to include more opportunity for quality water-based recreation through increased shoreline access, clean beaches, and clean water.

- Be stronger on accountability by incorporating clear benchmarks to get us to a healthy Puget Sound by 2020.

- Create more opportunities and stronger protection programs to improve the public's interaction with the shoreline and achieve enough water quality improvement and habitat restoration to inspire the public to go to the water's edge more frequently.

- Ensure that there is enough funding for Puget Sound to achieve the goals laid out in this ambitious agenda.

Thank you for your hard work to develop a draft Action Agenda to restore, protect and recover Puget Sound to health by 2020.

From: Slade Gorton

Comment: What great news!

From: Joan Gould

Comment: Dear Puget Sound Partnership,

I am writing to urge you to improve your action agenda's recommendations on pollution prevention.

From: S Gould

Comment: I am writing to urge you to improve your action agenda's recommendations on pollution prevention.

PugetSoundPartnership
our sound, our community, our choice

From: S Gould

Comment: Dear Puget Sound Partnership,

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The urgency of restoring the Sound to health is at a tipping point and missing orcas are the Sound's "canaries in the coal mine," telling us we are running out of time. But there is hope for the orca, as there was hope for the bald eagle, the California Condor and others on the verge of extinction. The Puget Sound Partnership's Action Agenda is a golden opportunity to do what has not been done for over 20 years- develop and implement a recovery plan that is accountable, effective, transparent and decisive with sustained funding to restore this national treasure to health by 2020.

The draft Action Agenda includes many of the essential elements that need to be done:

-Require low-impact development to reduce stormwater pollution;

-Prohibit new bulkheads near feeder bluffs and forage fish spawning beaches;

-Fund local governments to develop and carry out shoreline master programs;

-Fund enforcement staff at state agencies and local governments;

-Implement specific, aggressive cleanup plans for polluted waters, including TMDLs;

-Fully fund a permanent year-round rescue tug at Neah Bay for oil spill prevention;

-Acquire critical intact parcels for habitat protection and conservation;

-Set strong requirements for water quantity, such as setting in-stream flow for all major rivers.

BUT, more than a list of Soundwide and Action Area-specific actions, the Partnership must create a real 2020 Action Agenda, not just a 2-year plan, that clearly identifies the specific actions that are needed over the next 12 years and the HOW and WHO and BY WHEN each action must be completed. All the actions need to be tied together into a comprehensive plan with measurable benchmarks and timelines in order to achieve recovery by 2020. The final Action Agenda must:

-Clearly identify timelines and responsibilities;

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-Expand the indicator species to include more than just salmon, i.e. forage fish, harbor seals, etc.

The Partnership staff, the Leadership Council, Ecosystem Coordinating Board, Science Panel and stakeholders throughout the Sound deserve praise for the monumental effort involved in producing the draft Action Agenda. The next step is secure much needed funding. The 2009 legislature must adopt new funding sources dedicated to the recovery of Puget Sound by 2020.

For Puget Sound!

From: Sharon Grace

Comment: Dear PSP:

Attached are my comments to the Puget Sound Partnership Draft 2020 Action Agenda for Puget Sound.

PugetSoundPartnership
our sound, our community, our chance

SHARON GRACE
175 Gretchen Way
Friday Harbor, WA 98250
360-378-3377 Phone
360-378-6498 Fax
parons@rockisland.com

November 20, 2008

David Dicks
Puget Sound Partnership
Executive Director
P.O. Box 40900
Olympia, WA 98504

Re: Puget Sound Partnership Draft 2020 Action Agenda Comments

Dear Mr. Dicks:

Thank you and the Puget Sound Partnership for the opportunity to provide comments on the Partnership Puget Sound Draft 2020 Action Agenda. The proposed Action Agenda reflects a well done, integrated approach to restoring the Puget Sound/Salish Sea ecosystem. The major flaws I can discern in the Action Agenda can be attributed to recent events that occurred after most of the work on the Action Agenda had been done. These events are:

- the collapse of the salmon fisheries on the West Coast in 2008;
- the deaths of seven Southern Resident Killer Whales and one neonate calf in 2008, some of which appear to be due to starvation; and,
- the collapse of the national economy in 2008 and its effect on government budgets.

The collapse of the salmon fisheries and the deaths of the seven Southern Resident Killer Whales and a neonate calf this year are likely interrelated and are of the utmost importance. I urge the PSP to raise salmon recovery projects that can be accomplished the fastest to the highest strategic priority in all regions. These projects include removing creek, stream and river obstructions and barriers as soon as possible; banning salmon fishing until the fisheries are restored; and mass media education (TV, radio, Internet) of individuals and businesses about the unhealthy state of the Puget Sound/Salish Sea ecosystem to promote individuals to take immediate action on simple steps to eliminate toxics from their households and businesses, such as eliminating herbicides, pesticides, fertilizers, hazardous household cleaners and plastics from ordinary consumption.

To promote the immediate and long term survival of the Southern Resident Killer Whales, I urge the PSP to raise projects that can mitigate the threats to the whales the fastest, to the highest strategic priority in all regions. These projects include:

- ensuring strict enforcement by governmental agencies of existing orca viewing laws and increasing on the water boater education and patrols to protect the Southern Resident Killer Whales, and providing sufficient and sustained funding to accomplish each;

- supporting the enactment of a 200 yard vessel "no go" zone around the orcas;

- supporting the enactment of a one-half mile "no go" zone along the entire west side of San Juan Island and other congested areas such as Active Pass, when whales are present; and,

- supporting a fishing ban on Chinook and chum salmon in the entire Salish Sea until the counts are sufficiently high that the Southern Resident Killer Whales are no longer threatened by lack of prey,

Due to the collapse of the national economy and the high likelihood of fewer government dollars being available to fund the Action Plan, I urge the PSP to add a private funding plan component to the draft funding plan. The private plan should consist of obtaining corporate and individual donations on a recurring basis. The health of the ecosystem relates to the health of our economy. The orcas are indicator species that the ecosystem is unhealthy. Humans cannot be far behind in the effect that toxics are having on our bodies. The greater Seattle area has a good number of wealthy corporations and donors that have a high stake in having a healthy ecosystem. In addition, each individual citizen has a substantial stake in restoring the Puget Sound/Salish Sea environment to health. For the private funding plan to be successful, the low state of public awareness about the unhealthy plight of the Puget Sound/Salish Sea ecosystem must be raised significantly through education.

As a final comment I urge the PSP to work collaboratively with Canada, to the extent cooperating and collaborating with Canada does not impede implementation of the Action Plan. The Puget Sound/Salish Sea ecosystem does not recognize national boundaries. Canada's cooperation in cleaning up the ecosystem is essential.

Sincerely,

/s/

Sharon Grace

From: Jeremy Graham

Comment: Because I do not have enough time to put my thoughts out in an organized manner some of my statements may be fragmented and incomplete. Though at the same time this should help you understand my requests, suggestions, and argument.

First off, I am very concerned with the amount of time allowed for comments. This Action Agenda came out on Nov. 6th or 7th, and comments are to be made within a short 14 days. I am not sure, maybe this 14 days was chosen because of the SEPA comment requirements per the Administrative process. I am concerned with the alloted time due to the state that the State and country is in. We are in the middle of a major recession, people to the left and right of me are being laid off from Private, Corporate, and Government Jobs. Within the last two days two of my good friends in gov. have been let go. The puget sound partnership had 18 months to draft this action agenda and now when the public citizens are losing their jobs and panic mode is beinning to set in, we are only given a short 14 days to review the entire 97 page action agenda and 30-some page science plan and get comments in. I myself am very bogged down with an ever increasing work load and ever decreasing staff. I have spent two days reviewing the Agenda and feel it is a lot to get my head around while at the same time worrying I may be laid-off any day, at any time. I believe many others may feel the same. Please just take this into consideration.

Secondly, now that Gov. Gregoires State Deficit came out at a whopping $4.6 billion dollars ($4.6BILLION!!!!!!) and revenues continue to stay stagnant as consumer spending is falling. What is the true reality of this plan? On to of that another $700 billion Federal dollars being thrown toward a raging bon-fire. Where is the money going to come from to make this Action Agenda a reality. I whole heartedly argree that this Action Agenda needs to be pushed through, maybe this is a way to create more jobs and bring the economy back into the correct path.

Third, Why was this document made without a table of contents. Because I have been pressed for time it has made it hard to go directly to to the facts that affect me or my beliefs. It would have made some sense to create a table of contents so we didn't have to read through the entire draft agenda, but just hit the highlights.

Because of these issues I feel the public deserves some intent from the PSP showing that the PSP does care about the people that are trying to make this a reality, the public! I[We] don't want to be blown over by this, I[We] want to feel that I[We] have been allowed to be a part of it, just as it reads throughout the Agenda. I[We] deserve some time to make a thoughful well read comment. To be heard, to be listened to. Thanks for taking these comments into recommendation. I am sure you will do what is right.

From: Ruth Grant

Comment: Dear Puget Sound Partnership,

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The urgency of restoring the Sound to health is at a tipping point and missing orcas are the Sound's "canaries in the coal mine," telling us we are running out of time. But there is hope for the orca, as there was hope for the bald eagle, the California Condor and others on the verge of extinction. The Puget Sound Partnership's Action Agenda is a golden opportunity to do what has not been done for over 20 years- develop and implement a recovery plan that is accountable, effective, transparent and decisive with sustained funding to restore this national treasure to health by 2020.

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BUT, more than a list of Soundwide and Action Area-specific actions, the Partnership must create a real 2020 Action Agenda, not just a 2-year plan, that clearly identifies the specific actions that are needed over the next 12 years and the HOW and WHO and BY WHEN each action must be completed. All the actions need to be tied together into a comprehensive plan with measurable benchmarks and timelines in order to achieve recovery by 2020. The final Action Agenda must:

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The Partnership staff, the Leadership Council, Ecosystem Coordinating Board, Science Panel and stakeholders throughout the Sound deserve praise for the monumental effort involved in producing the draft Action Agenda. The next step is secure much needed funding. The 2009 legislature must adopt new funding sources dedicated to the recovery of Puget Sound by 2020.

For Puget Sound!

From: Harrison Grathwohl

Comment: Dear Leadership Council,

PROBABLY THE MOST IMPORTANT ACTION TO RESTORE SALMON IS TO GET RID OF THE DAMS ON THE ELWHA AS SOON AS POSSIBLE.

Thank you for the opportunity to comment on the Puget Sound Partnership Draft Action Agenda. I appreciate the tremendous amount of work that has gone into developing it and I support the strong list of measures that, if implemented, will go a long way toward recovering Puget Sound by 2020.

The draft plan includes a few omissions. The final plan should include Outstanding Resource Water (ORW) designation under the Clean Water Act as a tool to help protect rivers and other aquatic habitat. While I strongly support the inclusion of Wild and Scenic designation as a similar tool, in some cases ORW designation will likely prove to be a better, more immediate way for the state to ensure the protection of high quality rivers and other waters. Therefore, I urge the Partnership to include support for the Outstanding Resource Water designation as one of its "Near Term Actions." ORW designations permanently protect high quality waters that are ecologically significant, provide cold water refuges for fish, and/or support important recreational values. Many rivers in the Puget Sound region are eligible for ORW designation.

I would also like to encourage you to include funds to move up the removal of the two dams on the Elwha from 2012 to 2010. Removal of the

Elwha dams is one of the best chances for salmon and steelhead recovery in the region as it

will open up over 70 miles of prime spawning habitat. Removing these dams has also been as a key action to recover our Puget Sound's orca population, which is malnourished thanks to a lack of chinook salmon.

Especially during difficult financial times, finding opportunities for

economic benefit and job creation is important. Removing the Elwha dams provides a tremendous opportunity for creating "green jobs"

and numerous other economic benefits.

Thank you for taking my comments into consideration.

From: Marita Graube

Comment: Dear Puget Sound Partnership,

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For Puget Sound!

From: Craig Green

Comment: 1. Moved here about 18 months ago. Garage contained significant amounts of old paint, solvents and unindentifiable chemicals. I wanted to get rid of these in a responsible way. Turns out that on San Juan Island the opportunity to dispose of 'hazardous' waste occurs only once, (ONCE!), yearly...one time in April 'Hazardous Helen' appears and manages the ritual. Rather than flushing, dumping, burning or burying the material I waited 7 months to dump it. The line up at the dump that day was very long and it cost fifty bucks. Guy in front of me paid over a hundred. Helen was a hoot! Very pleasant, very efficient, no complaints there. Nevertheless, this is not user friendly and is not conducive to the behaviour which you wish to inspire. Hmmm....I own a backhoe and have ten acres... easier and cheaper for me to bury it next time. How many others are saying the same? On a related note, styrofoam is,

here, considered garbage and not recycylable. As such there is a fee...minimum $7.50 per trip to dump it. Again, not user friendly. On the positive side, the dump does offer tasty dog biscuits. 2. Seems curious to me that S.J. County is focused on individual spetic systems which might be leaking while the entire Victoria Metro area dumps raw sewage into the sound. Sure, we need to do what we can to clean up our own issues but our backyard includes Canada and they appear to be growing too and to be fouling the Sound all out of proportion to our population an to theoretically problematic private septic systems. And, BTW, the backlog to get into a required septic 'course' is measured in many months. 3. There are many citizens that are willing to help. We just need direction. Thanks for caring,

From: Alex and Harvey Greenberg

Comment: Dear Puget Sound Partnership,

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The Partnership must create a real 2020 Action Agenda, not just a 2-year plan that clearly identifies the specific actions that are needed over the next 12 years and the HOW and WHO and BY WHEN each action must be completed. All the actions need to be tied together into a comprehensive whole through measurable benchmarks that must be accomplished in order to achieve recovery by 2020.

Thank you for this opportunity to strengthen a strategy to save Puget Sound.

From: Holly Greenspoon

Comment: I appreciate all the work you have completed on this action plan. As for my specific comments and suggestions, as a King County Trustee for the Cascade Land Conservancy, I would ask that the plan calls for immediate implementation of incentives (such as TDR) to promote concentrated population growth in the urban areas. Other programs such as those that address rural growth must be sensitive to property owners but addresses the issues of large scale growth that is occuring in the region. As a general comment, please make sure restoration efforts have solid monitoring/maintenance components. Any land based project that is not showing signs of immediate success need to be scrapped or revised. As you know, wetland restoration projects aren't always successful. Money should not be spent on projects that don't have a likelihood of success. Better to use the money elsewhere and stop the removal of any wetland areas. The larger community needs constant messaging on the top x number of actions they can do to save the sound. Don't just talk about attending volunteer events-- many people cannot participate but still want to do something. Our area has a reputation of people willing to do their part. We also have people moving in who observe our natural beautiful environment but don't have much of a clue about what it takes to preserve it. The transfer of information is not occurring from longterm residents with that

knowledge to recent arrivals. so, consistent longterm messaging is necessary for success in winning over the public and gaining support for this long term effort.

From: Virginia Greenwood-Warner

Comment: Dear Puget Sound Partnership,

I am writing to urge you to improve your action agenda's recommendations on pollution prevention.

From: Tom Gries

Comment: I am writing, as an informed citizen, to offer the following comments, somewhat rough order of priority, on the Puget Sound Partnership's DRAFT Action Agenda.

1. The Draft Action Agenda is evidence of an admirable effort to determine how to reverse a long-term trend of only limited progress made to protect and restore Puget Sound region ecosystems. Evidence for this includes contaminant loading from stormwater discharges that has likely increased during past decades (although agencies do not collect adequate data to confirm or refute this).

2. The Draft Action Agenda appears to be the result of a carefully-planned (albeit a bit hurried) process to gather information and opinions on what actions may be needed from a broad audience. The four priorities and many of the recommended actions are very similar to ones suggested by many experts for the past 20 years. On the other hand, some of the detailed, near-term action items show a lot of creative thinking.

3. The Draft Action Agenda recognizes the needs for:

a. better coordination and cooperation among governmental entities

b. increased enforcement of exisitng regulations

c. funding of existing government programs

d. development of new government programs

e. measures of government agency performance that are ecologically meaningful

However, the Puget Sound Partnership and the Draft Action Agenda do not appear to have explored possible explanations for why Puget Sound ecosystems are in their present state - deteriorated in many ways. The reasons for previous failures must be understood and acknowledged or else history will repeat itself. One factor that has limited the "successes", in my opinion, is that most managers within government agencies work within a paradigm that rewards "safe" decisions and avoids controversy, instead of a paradigm rewards those who assertively seek to accomplish the overarching agency mission(s). I (and many colleagues) have observed that many programs and managers within public agencies often –do not cooperate –"pass the buck" to other programs and managers if they believe a

program/project or task will make them “look bad” –are held accountable for performance measures that are chosen to ensure that they will “look good” or succeed –are NOT held accountable for performance measures that are ecologically meaningful. [How important is tracking the number of reports reviewed each month versus the number of discharge permits issued, the current number of individuals in a depleted population of resident fish, or the number of tideland acres newly remediated and now being monitoring for success]. The Draft Action Agenda recommends little to change these existing paradigms in regulatory agencies. Some performance measures that are ecologically-significant are recommended, but there needs to be far more accountability for program performance that is ecologically meaningful.

4. Action Agenda clearly emphasizes that the projected growth in the Puget Sound regional population over the next 12 years MUST be “smart growth”. Thus, it correctly prioritizes the need for and suggests many actions associated with low-impact development. However, it does not seem to recognize that the GMA has been in place for 18 years (and other well-intentioned laws and regulations have long been in place) and yet Puget Sound basin ecosystems have mainly deteriorated (with some notable exceptions).

Except for the identification, purchase, and protection of ecologically significant parcels, recommended action items in “A1 and A2” do not seem new and do seem largely rhetorical. The Action Agenda understandably avoids the controversial notion of needing to slow down the absolute rate of population growth in the region, but accommodating the projected population growth, even if done carefully, just may not be enough to “save the Sound”. The likelihood of overall success in protecting and restoring Puget Sound ecosystems is almost certain to be indirectly proportional to the magnitude of projected population increase.

So, the Action Agenda should consider creative ways to amend the GMA, implement impact fees, discourage the import or start-up of non-green businesses, etc., so as to slow the projected population growth. Chances of success protecting and restoring Puget Sound will greatly increase if, for example, there are only 1 million new residents in the Puget Sound basin in the year 2020 instead of 1.5 million new residents. And the Action Agenda could easily cite any number of articles and study reports that would serve to dispel the myth that a vibrant regional community and economy depends on growth.

5. The Action Agenda places a level of emphasis on protection and restoration of salmon populations that may be a bit too risky. Healthy salmon populations are indeed iconic to the region, and in many ways indicative of healthy regional ecosystems, but their relative demise in recent decades is likely due in part to factors outside the control of regional regulators and stakeholders. For example, general health and reproductive success of salmonids may be tied to levels of toxics in tissues accumulated while living in the open ocean, not accumulated during brief transits through Puget Sound. Neither is the overfishing of Washington salmonids entirely within control of the Washington State Department of Fish and Wildlife.

Thus, it may make more sense to recommend actions aimed at protecting and/or restoring species that are more “resident” within the Sound. Examples might include: –depleted stocks of Pacific herring –sentinel benthic species, such as Dungeness crab, bent-nose clams, native sea stars, etc.

6. I commend the Action Agenda’s emphasis on studying and reducing contaminant/

pollutant loading to Puget Sound from stormwater discharges a clear priority. However, several "workgroups" that date back to the 1990's or earlier recognized stormwater loading as a key issue. Yet relatively little was done in the intervening years, perhaps intentionally, to reduce this source of contaminant/ pollutant loading. Perhaps there needs to be a better understanding of why more was not accomplished during the last 15 years before moving forward with some of the actions recommended in the Draft Action Agenda. One specific action that was not mentioned but should be considered as a near-term action is to initiate a grant and/or loan program that helps local govenrments pay for and maintain a vigorous program of street sweeping/vaccuuming to remove dry material from stormwaters before it reaches storm drains. It is widely accepted that prevention costs far less than treatment to remove contaminants/pollutants once in stormwater.

7. Current regulatory process (federal and state) for evaluating the risks associated with contaminated aquatic lands, as well as the processes for deciding on and taking appropriate and effective remedial actions at aquatic sites must change radically. If it takes a minimum of ten years to complete an aquatic cleanup (start to finish) then relatively few new aquatic site cleanups will be effected between 2009 and 2020.

8. The Draft Action Agenda fails to identify sediment as a medium separate (and quite unique from) water and sediment quality, per se, as worthy of protection. It also underemphasizes the importance of high quality benthic habitats, communities and sentinel species as a vital foundation to the aquatic food webs that support the species identified as highest priority for protection.

9. Recommended action (somewhat discussed in the Draft Action Agenda): Prioritize sediment cleanups according to risk to human health and the environment, using a transparent and scientifically-sound ranking system. This has not been done since the mid-1990s.

Also prioritize cleanup of upland sites in the Puget Sound basin according to the same risks. Some may claim this is being done under the Puget Sound Initiative, but many staff insist prioritization of such cleanup sites in the Puget Sound basin is often based solely on proximity to the shoreline. By this criterion, a zero-discharge facility located on Puget Sound shoreline may rank higher and receive funds for actions long before one that is located a mile away from the shoreline but that discharges substantial pollutants/contaminants directly into the Sound. This needs to change.

10. Recommended action: Initiate comprehensive amendments to Chapter 173-204 (Sediment Management Standards). The triennial review required by the rule has only been formally conducted once or twice in the 17+ years since adoption, thus many of the scientific underpinnings of the rule are now outdated. The rule needs more than "band-aid" revisions that address only the most critical issues and sections. Will remedial actions at aquatic sites be protect benthic communities and habitats, or protect human health if the standards are inadequate or unclear?

11. Recommended action: Create a regional monitoring entity like the Southern California Water Resources Research Program (SCWRRP) that effectively consolidates all PSAMP-like functions "under one roof". Then ensure that staff are appropriately trained and provide a

reliable and adequate source of funding for it to function in a meaningful way.

12. Recommended action (somewhat discussed in the Draft Action Agenda): Create a comprehensive public awareness campaign that results in widely accessible presentations (different formats, highly visual) describing the State of the Sound, actions needed and being taken to protect and restore it. Video-based (e.g., Hudson River example at Liberty Science Center, NJ). CD-based (Planned by interagency "MUDS" project) and mailed to neighborhood associations with offers of various staff to host neighborhood meetings. Increased TV coverage. The limited time made available for citizens to review the Draft Action Agenda and respond with comments prevents has effectively limited my ability to provide more comments or tie my comments to specific passages in the Draft Action Agenda.

From: David Griffin

Comment: Dear Puget Sound Partnership,

The Partnership staff, the Leadership Council, Ecosystem Coordinating Board, Science Panel and stakeholders throughout the Sound deserve praise for the monumental effort involved in producing the draft Action Agenda. The next step is to finalize a plan that is accountable, transparent, effective and have dedicated new funding sources to the recovery of Puget Sound by 2020.

The Partnership must create a real 2020 Action Agenda, not just a 2-year plan that clearly identifies the specific actions that are needed over the next 12 years and the HOW and WHO and BY WHEN each action must be completed. All the actions need to be tied together into a comprehensive whole through measurable benchmarks that must be accomplished in order to achieve recovery by 2020.

Thank you for this opportunity to strengthen a strategy to save Puget Sound.

From: Mike Grijalva

Comment: Dear Leadership Council,

Thank you for the opportunity to comment on the Puget Sound Partnership Draft Action Agenda. I appreciate the tremendous amount of work that has gone into developing it and I support the strong list of measures that, if implemented, will go a long way toward recovering Puget Sound by 2020.

The draft plan includes a few omissions. The final plan should include Outstanding Resource Water (ORW) designation under the Clean Water Act as a tool to help protect rivers and other aquatic habitat. While I strongly support the inclusion of Wild and Scenic designation as a similar tool, in some cases ORW designation will likely prove to be a better, more immediate way for the state to ensure the protection of high quality rivers and other waters. Therefore, I urge the Partnership to include support for the Outstanding Resource Water designation as one of its "Near Term Actions." ORW designations permanently protect high

quality waters that are ecologically significant, provide cold water refuges for fish, and/or support important recreational values. Many rivers in the Puget Sound region are eligible for ORW designation. I would also like to encourage you to include funds to move up the removal of the two dams on the Elwha from 2012 to 2010. Removal of the Elwha dams is one of the best chances for salmon and steelhead recovery in the region as it will open up over 70 miles of prime spawning habitat. Removing these dams has also been as a key action to recover our Puget Sound's orca population, which is malnourished thanks to a lack of chinook salmon.

Especially during difficult financial times, finding opportunities for economic benefit and job creation is important. Removing the Elwha dams provides a tremendous opportunity for creating "green jobs" and numerous other economic benefits.

Thank you for taking my comments into consideration.

From: David Grimes

Comment: Without a mandated requirement to control stormwater runoff from existing development and future, this proposal is seriously flawed. Such a mandate is long overdue. I highly concur with most of the other aspects of the proposal. Now let's see some action!!!

From: Barbara Gross

Comment: Dear Puget Sound Partnership,

I am writing to urge you to improve your action agenda's recommendations on pollution prevention. As long as we keep polluting the ground water and dumping it into the Puget Sound, marine creatures will continue to be adversely affected. Few issues are more important.

From: Ravi Grover

Comment: Dear Puget Sound Partnership,

Thank you for your hard work to develop a draft Action Agenda to restore, protect and recover Puget Sound to health by 2020. It could not come at a more pressing time, especially for the Sound's iconic and endangered orca whale. Just this month, researchers reported seven orcas "10% of the Puget Sound population" are missing and believed to be dead. Some experts say dwindling populations of endangered Chinook salmon are at least partly to blame. Is this a sign that our ecosystem is on the verge of collapsing?

The urgency of restoring the Sound to health is at a tipping point and missing orcas are the Sound's "canaries in the coal mine," telling us we are running out of time. But there is hope for the orca, as there was hope for the bald eagle, the California Condor and others on the verge of extinction. The Puget Sound Partnership's Action Agenda is a golden opportunity to do what has not been done for over 20 years- develop and implement a recovery plan that is

accountable, effective, transparent and decisive with sustained funding to restore this national treasure to health by 2020.

The draft Action Agenda includes many of the essential elements that need to be done:

-Require low-impact development to reduce stormwater pollution;

-Prohibit new bulkheads near feeder bluffs and forage fish spawning beaches;

-Fund local governments to develop and carry out shoreline master programs;

-Fund enforcement staff at state agencies and local governments;

-Implement specific, aggressive cleanup plans for polluted waters, including TMDLs;

-Fully fund a permanent year-round rescue tug at Neah Bay for oil spill prevention;

-Acquire critical intact parcels for habitat protection and conservation;

-Set strong requirements for water quantity, such as setting in-stream flow for all major rivers.

BUT, more than a list of Soundwide and Action Area-specific actions, the Partnership must create a real 2020 Action Agenda, not just a 2-year plan, that clearly identifies the specific actions that are needed over the next 12 years and the HOW and WHO and BY WHEN each action must be completed. All the actions need to be tied together into a comprehensive plan with measurable benchmarks and timelines in order to achieve recovery by 2020. The final Action Agenda must:

-Clearly identify timelines and responsibilities;

-Identify adequate and sustained funding for the long haul;

-Be a visionary and long term plan;

-Be based on science;

-Offer a comprehensive and robust program to prevent all sources of stormwater pollution, not just municipal stormwater;

-Strengthen the list of actions for toxic pollution prevention;

-Set meaningful standards for habitat protection;

-Balance regulatory change with land acquisition to accomplish long term recovery goals;

-Expand the indicator species to include more than just salmon, i.e. forage fish, harbor seals, etc.

The Partnership staff, the Leadership Council, Ecosystem Coordinating Board, Science Panel and stakeholders throughout the Sound deserve praise for the monumental effort involved in producing the draft Action Agenda. The next step is secure much needed

funding. The 2009 legislature must adopt new funding sources dedicated to the recovery of Puget Sound by 2020.

For Puget Sound!

From: Dave Groves

Comment: Dear Puget Sound Partnership,

The Partnership staff, the Leadership Council, Ecosystem Coordinating Board, Science Panel and stakeholders throughout the Sound deserve praise for the monumental effort involved in producing the draft Action Agenda. The next step is to finalize a plan that is accountable, transparent, effective and have dedicated new funding sources to the recovery of Puget Sound by 2020.

The Partnership must create a real 2020 Action Agenda, not just a 2-year plan that clearly identifies the specific actions that are needed over the next 12 years and the HOW and WHO and BY WHEN each action must be completed. All the actions need to be tied together into a comprehensive whole through measurable benchmarks that must be accomplished in order to achieve recovery by 2020.

Thank you for this opportunity to strengthen a strategy to save Puget Sound.

From: Bruce Gundersen

Comment: Dear Puget Sound Partnership,

Thank you for your commitment to developing an Action Agenda for a healthy Puget Sound. From struggling orcas to toxic chemicals in our water, the Sound needs quick and decisive action today. I want to make sure we pass a thriving Puget Sound on to future generations.

I urge the Partnership to incorporate accountability, benchmarks of success, and ample funding into this Agenda.

The draft Action Agenda includes many of the essential elements that need to be accomplished, but in addition, the final Action Agenda must also:

Amend the Cruise Ship MOU to ban all cruise ship discharges in Puget Sound;

Prioritize the protection and restoration of the State?s forage fish spawning beds;

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Identify adequate and sustained funding for Plan implementation;

Update the guidance for open water dredge disposal of PCBs;

Expand the indicator species to include forage fish abundance and harbor seal toxics

loading; and

Accelerate the restoration of the Elwha River.

Thank you for your hard work to develop a draft Action Agenda to restore, protect and recover Puget Sound to health by 2020.

On behalf of everything from eelgrass to orcas.

From: Barbara Guthrie

Comment: Dear Puget Sound Partnership,

Thank you for your hard work to develop a draft Action Agenda to restore, protect and recover Puget Sound to health by 2020. When it comes to restoring the health of the Puget Sound, where and how we grow matters. Especially in light of the one million new residents the state expects to welcome by 2020. It's more crucial than ever to focus that growth inside our urban areas so that we can preserve our farm and forest land and protect our rural areas to restore critical habitats and watersheds of the Sound.

While I applaud your effort thus far, the Action Agenda can and must go farther. We need a twenty year plan, not a two year plan. All the actions need to be tied together into a comprehensive plan with measurable benchmarks and timelines in order to achieve recovery by 2020.

As you finalize the final Action Agenda, please:

-Balance regulatory change with land acquisition to accomplish long term recovery goals;

-Take advantage of the region's recent vote to build 34 miles of new light rail - we must capitalize on this investment by requiring more intense development near these station areas that are pedestrian, bicycle and transit friendly;

-Identify adequate and sustained funding for the long haul;

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From: Brie Gyncild

Comment: Dear Puget Sound Partnership,

I am writing to urge you to improve your action agenda's recommendations on pollution prevention. I want a healthy Puget Sound to be part of the legacy we leave our children.

Many Washington manufacturers continue to use harmful chemicals without any plans to switch to chemicals that are safer for Puget Sound. To protect public health and the environment, Washington's industry must begin phasing out of the worst toxic chemicals and developing plans to switch to safer alternatives.

Please include recommendations to help move Washington's businesses toward safer alternatives and away from chemicals known to be harmful to Puget Sound. These proposals should include:

Increasing the availability of technical assistance to help businesses reduce chemical use.

Developing a state program to focus on researching safer chemicals and materials.

Requiring better industry reporting to Ecology of the chemicals currently being used.

From: Eliza Habegger

Comment: Dear Puget Sound Partership,

Congratulations on the Draft Action Agenda. It is no easy task to attempt this sort of "bottom-up" approach to developing a plan. Your hard work is evident. I confess I have not given the Draft Action Agenda a close and careful read, thought I have paid closer attention to the specific recommendations for San Juan County, where I reside. In general, both the broad and specific recommendations appear to be logical, use good common sense, are based on science, and seem pretty moderate, all of which should be helpful in garnering public support.

My primary comment relates to the issue of population growth. As stated in your Draft: "Population growth and climate change will amplify the current situation. At least another million people will live here in the next 15 to 20 years." All of the 6 six main threats you identify are closely linked to population. As with many other conservation efforts, population growth is identified (or implied) as a major root cause of threats and habitat decline. And yet, population growth is accepted as inevitable and is not mentioned in the actions. I would like to see the conservation community begin to view population growth as something that we have a hope of influencing. I realize that talking publicly about the expected benefits of controlling population growth is extremely sensitive, to say the least! It is a very difficult topic to approach without risking the appearance of casting judgement, or of criticizing cultures that value large families, or of limiting people's freedom. And yet, I believe that conservationists MUST try to begin this discussion with the public. Surely, we are capable of talking about it - in the spirit of education, with compassion, without judgement, without imposing restrictions. In avoiding the issue, we risk losing our hard-earned conservation

gains to the needs of an ever larger population. I'm certainly not suggesting that the Puget Sound Partnership should "take on" population growth. My point is only to urge that you present population growth not as an inevitability, but as an environmental variable that we have the power to talk about and to influence.

Thank you for taking the time to consider my comment, and thank you for your hard work.

From: Stephanie Hagel

Comment: Dear Puget Sound Partnership,

Thank you for your commitment to developing an Action Agenda for a healthy Puget Sound. From struggling orcas to toxic chemicals in our water, the Sound needs quick and decisive action today. I want to make sure we pass a thriving Puget Sound on to future generations.

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-Accelerate the restoration of the Elwha River.

Thank you for your hard work to develop a draft Action Agenda to restore, protect and recover Puget Sound to health by 2020.

On behalf of everything from eelgrass to orcas.

From: Bob Hager

Comment: The attachment contains my comments on the chart containing the Draft Action Area Priorities - Hood Canal Action Area. If there are any questions please contact me.

Comments on Draft of Hood Canal Action Area Chart

The errors in tribes and rivers under Community and Economy were corrected in the latest version. However, none of the communities are listed in this section such as Seabeck, Brinnon, Union, Hoodsport and Belfair and should be added.

Under Local Threats

Pollution

Nutrient loading

Should say "significant low dissolved oxygen in marine water" and include comment on algae/ phytoplankton blooms, and vegetation impacts such as eel grass

Surface water runoff impacts

Should include sediments and pollutants in both freshwater and marine water.

Freshwater Resources

Not aware of any year round low flows in WRIA 14b.

Invasive species

Should include marine Japonica impact on eelgrass

Artificial Propagation

Clarify statement that shellfish production not identified as alocal issue.

Harvest

Needs to be more specific on threats

Localized climate change impacts

Should include changes in rainfall and flow in rivers

Other

Need to identify what are the conflicting use values of marine shorelines

Increase population should be identified for the Hood Canal watershed not for all the three Counties.

Priority Action Area Strategies

A. Protect Intact Ecosystem

Mason County must do more than complete a Critical Areas Ordinance. Need to apply the 2005 Ecology Stormwater manual & LID Ordinance to the Hood Canal Marine Recovery Area watershed. Also update the On-site sewage Ordinance including specific requirements for the Hood Canal MRA.

C. Reduce Sources of Water pollution

Prevent Pollution

TMDL-too general- Be specific on which TMDL's need development & implementation- Marine water? which rivers and streams?

E. Other

(An additional item that is a concern of residents)

Determine the cause of Dungeness crab disappearance in lower Hood Canal

From: Jennifer Hahn

Comment: Dear Puget Sound Partnership,

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For Puget Sound!

PugetSoundPartnership
our Sound, our community, our change

November 20, 2008

To: Puget Sound Partnership
Testimony for the Hearings

From: Martha Hall

I cannot attend a hearing so I'd like to make my comments in person regarding the Action Plan. I visited with my state representatives supporting the Puget Sound Initiative but I feel there has been far too much talk and far too little action. I hope this plan will do more to solve the many problems in Puget Sound.

I feel strongly about the health of Puget Sound. It marks where we live. Its condition says a lot about us. It is our responsibility to have it healthy. It is shocking that our local orca population is the most toxic marine mammal in our world.

I hope the Action Plan will address these concerns I have.

1. Funding. I know our state is short on money. But Puget Sound should be one of our priorities. Funding needs to be sustainable for at least ten years into the future. New sources are needed. One source could be more fines on polluters. I live in Anacortes and our refineries have been out of compliance with regulations many times. Why aren't they paying more in fines?
2. Regulation. To protect Puget Sound we need good and clear regulations.
3. Our Puget Sound is still very toxic. Look at our orcas. How did this happen?
4. We still need a good stormwater plan that applies to all areas on Puget Sound.

I hope you will consider these comments.
There is not a public hearing near my home in Anacortes so I am writing instead.

Martha Hall
Martha Hall
2617 16th St
Anacortes, WA 98221
kingfish@fidalgo.net
360 293 7476

RECEIVED
NOV 21 2008
PUGET SOUND PARTNERSHIP

From: Daniel Halos

Comment: Dear Puget Sound Partnership,

I am writing to urge you to improve your action agenda's recommendations on pollution prevention.

From: Willa Halperin

Comment: Dear Puget Sound Partnership,

I want to tell you that I appreciate your hard work to develop a draft Action Agenda to restore, protect and recover Puget Sound to health by 2020. It could not come at a more pressing time, especially for the Sound?s iconic and endangered orca whale. Just this month, researchers reported seven orcas "10% of the Puget Sound population" are missing and believed to be dead. Some experts say dwindling populations of endangered Chinook salmon are at least partly to blame. Is this a sign that our ecosystem is on the verge of collapsing?

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actions that are needed over the next 12 years and the HOW and WHO and BY WHEN each action must be completed. All the actions need to be tied together into a comprehensive plan with measurable benchmarks and timelines in order to achieve recovery by 2020. The final Action Agenda must:

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-Strengthen the list of actions for toxic pollution prevention;

-Set meaningful standards for habitat protection;

-Balance regulatory change with land acquisition to accomplish long term recovery goals;

-Expand the indicator species to include more than just salmon, i.e. forage fish, harbor seals, etc.

The Partnership staff, the Leadership Council, Ecosystem Coordinating Board, Science Panel and stakeholders throughout the Sound deserve praise for the monumental effort involved in producing the draft Action Agenda. The next step is secure much needed funding. The 2009 legislature must adopt new funding sources dedicated to the recovery of Puget Sound by 2020.

I have traveled all over the world and always know when I come home that I am fortunate to live in the most beautiful place on this planet. I want to protect what we have.

From: Holli Hamilton

Comment: Dear Puget Sound Partnership,

Thank you for your commitment to developing an Action Agenda for a healthy Puget Sound. From struggling orcas to toxic chemicals in our water, the Sound needs quick and decisive action today. I want to make sure we pass a thriving Puget Sound on to future generations.

I urge the Partnership to incorporate accountability, benchmarks of success, and ample funding into this Agenda.

The draft Action Agenda includes many of the essential elements that need to be accomplished, but in addition, the final Action Agenda must also:

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-Update the guidance for open water dredge disposal of PCBs;

-Expand the indicator species to include forage fish abundance and harbor seal toxics loading; and

-Accelerate the restoration of the Elwha River.

Thank you for your hard work to develop a draft Action Agenda to restore, protect and recover Puget Sound to health by 2020.

On behalf of everything from eelgrass to orcas.

From: Diana Hammer

Comment: Dear Puget Sound Partnership,

I am writing to urge you to improve your action agenda's recommendations on pollution prevention. Please protect the health of our sound and its inhabitants.

From: Christie Hammond

Comment: Dear Puget Sound Partnership,

The Partnership staff, the Leadership Council, Ecosystem Coordinating Board, Science Panel and stakeholders throughout the Sound deserve praise for the monumental effort involved in producing the draft Action Agenda. The next step is to finalize a plan that is accountable, transparent, effective and have dedicated new funding sources to the recovery of Puget Sound by 2020.

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Thank you for this opportunity to strengthen a strategy to save Puget Sound.

From: Thomas Hammond

Comment: Dear PSP,

Thanks for opportunity to comment on the draft action agenda--and more importantly, thanks for the great work PSP has done in bringing attention to the plight of Puget Sound, and the actions required to restore this region's natural legacy. Ultimately our quality of life here in the Pacific Northwest results from the natural wonders around us--to restore and protect Puget Sound is to protect our very way of life, now and for generations to come...

I believe the action agenda needs to better emphasize preservation of upstream habitat, as well as ways to mitigate pollutants, especially petroleum products, washing off all roads and in to the Sound. The draft agenda often cites the need to protect intact ecosystems/processes (introduction, page 3, question 2, page 4, question 3, page 1), but I believe it doesn't go far enough in explicitly stating the need for permanent protection of headwaters feeding Puget Sound. Only a passing reference is seen on page 5 of question 3, and other references to "watershed scale study". The agenda should explicitly and repeatedly call for protecting the last remaining roadless areas (federal and state land) in the form of Wilderness or similar state level protections.

The study accurately notes that protecting intact habitat is the most cost-effective means of accomplishing the goal of restoring Puget Sound, but doesn't clearly link what "intact habitat" is, and how we can get the biggest bang for our buck by designating roadless areas under the highest forms of protection (Wilderness). Furthermore, there should be an explicit call for removal of old, sediment-bleeding logging roads throughout the highly productive, low elevation forests across the region. This addresses both habitat, and water quality. The agenda should call for converting some of the areas formerly logged (especially steep slopes, and at headwaters/riparian/watershed areas) to Wilderness/highest forms of protection as well, as many of these areas are suitable for such high-level protection. The study also stresses going after pollution at its source. While this is a good message for all to see, the fact is we can't even get the fleet of trucks working garbage and recycling collection in Seattle to take simple preventative steps. I've sent many letters to the city, and calls to Waste Mgmt to alert them that collection trucks leak petroleum products (mainly gear oil and engine oil), yet it continues. We need to stop such events at the source, but also focus efforts on intercepting such pollutants before they reach streams and bodies of water.

Finally, I note you ask "What region of the Sound do you live in?". I live in Seattle most of the time, but also live (fish, hike. climb, explore, camp, undeveloped land-owner) in the upper reaches of the Puget Sound, from the North Fork Stillaguamish to the Suiattle. From the Dosewallips to the Gray Wolf. The PSP must take a holistic view of the landscape, and the plan must call for the highest levels of protection (Wilderness on federal land) for old clearcut land (Tenas Creek in the North Cascades is a perfect example) and remaining roadless areas.

Thanks again for the opportunity to comment.

From: Cindy Hansen

Comment: Dear Puget Sound Partnership,

Thank you so much for your efforts to restore Puget Sound by the year 2020. The Draft Action Agenda is very thorough and well-written. I only have a few comments and requests.

I would like to suggest that in listing your "six issues that reflect ecosystem health", that you list the health of the indicator species, the killer whale, as one of those issues. The health of the top predator in the region tells you about the health of the entire ecosystem and I feel that the local killer whale population should be added to this list.

Under the section of what people can do now, I have another suggestion. I just recently learned that soaps, cleaners, and anything else containing surfactants can congest the gills of fish and be very detrimental. A recommendation to use the least amount of these products possible in your daily lives will help offset this threat.

Under question 1, page 2, "what defines success" I would like to suggest that you add a paragraph about the top predator, the southern resident killer whales, restored to a healthy viable population.

I believe that education should be a major part of any recovery efforts, so supporting groups like The Whale Museum, Orca Network, People for Puget Sound, Soundwatch, and the Salish Sea Association of Marine Naturalists (SSAMN) who are actively educating the public about issues in the Salish Sea is very important.

I also encourage you to continue working with the Orca Recovery Plan and the Salmon Recovery Plan to implement the action items as quickly as possible. The Southern Resident killer whales have reached a crisis point and something needs to be done immediately in order to prevent the loss of the entire population.

The research and recovery efforts that are underway are great, but we can't afford to wait a few more years for more data to come in. So I thank you for holding meetings to discuss this issue and for giving people the opportunity to suggest actions that may provide immediate help to these animals.

I would also encourage you to continue to find ways to work with California, Oregon, Alaska and British Columbia to find solutions that will benefit the Pacific coastal region as a whole. Thank you for your continued efforts.

From: Rick Harlan

Comment: Dear Puget Sound Partnership,

I am writing to urge you to improve your action agenda's recommendations on pollution prevention.

From: Barb Harmon

Comment: Dear Puget Sound Partnership,

My Comments are below:

-Require low-impact development to reduce stormwater pollution - [comment] Pavers instead of blacktop and concrete for new construction/additions

-Set strong requirements for water quantity and robust program to prevent all sources of stormwater pollution -

[comment]: Suggest regulating yard chemicals to be only those that are environmentally good in the areas within x-miles of the bay and waterways, if we cannot establish it state wide. Another option would be to set up non-profit stores that supply green supplies for the home landscaper. Lower costs than they can get elsewhere with educational information at the store.

Give 6 month to 1 year warning ticket to all vehicles leaking oil (fluids). Proper disposal of the vehicle or physical proof (visual inspection at no charge) of repair being made would cancel all fines. This would demonstrate to the public that caring goes both ways - you care about them and the financial difficulties they may have - but we also care about our waterways and our future health. It would be expensive, but I believe substantially cheaper than large as campaigns and print material.

-A meaningful standard for habitat protection;

-Balance regulatory change with land acquisition to accomplish long term recovery goals [comment]: And future green spaces - we have to think broader based and comprehensive - by not thinking the same way we did.

From: Barbara L Harmon

Comment: Dear Puget Sound Partnership,

I am writing to urge you to improve your action agendas recommendations on pollution prevention.

From: Eric Harmon

Comment: Dear Puget Sound Partnership,

I am writing to urge you to improve your action agenda's recommendations on pollution prevention.

PugetSoundPartnership
our sound, our commitment, our change

From: Joan G Harris

Comment: Dear Puget Sound Partnership,

I am writing to urge you to improve your action agendas recommendations on pollution prevention. The health of Puget Sound is also the health of the people in and around the sound area as well as the wild life. The two go hand in hand.

From: Howard Harrison

Comment: Dear Puget Sound Partnership,

I am writing to urge you to improve your action agenda's recommendations on pollution prevention. I want a healthy Puget Sound to be part of the legacy we leave our children.

Many Washington manufacturers continue to use harmful chemicals without any plans to switch to chemicals that are safer for Puget Sound. To protect public health and the environment, Washington's industry must begin phasing out of the worst toxic chemicals and developing plans to switch to safer alternatives.

Please include recommendations to help move Washington's businesses toward safer alternatives and away from chemicals known to be harmful to Puget Sound. These proposals should include

-Increasing the availability of technical assistance to help businesses reduce chemical use.

-Developing a state program to focus on researching safer chemicals and materials.

-Requiring better industry reporting to Ecology of the chemicals currently being used.

From: Sylvia Hartman

Comment: Dear Puget Sound Partnership,

I am writing to urge you to improve your action agendas recommendations on pollution prevention.

Too much time and effort has been spent on efforts to provide media with supposed actions taken by the government of this state to clean up Puget Sound, and protect the public. Not enough has been accomplished to provide actual cleanup in the Sound.

Require Monsanto and other corpotrations that sell chemical product for agricultural and garden use to provide proof that their products are non toxic to the environment. Ignore their considerable lobbying efforts and media lies about how safe their products are. Only allow sale of products that are proven to be environmentally sound. Stores still sell chemicals that are supposed to be banned in this state! Please do your part, because it's obvious that the citizens of this state care about orcas, salmon, and all components of these waters.

From: Carolyn Hartt

Comment: Dear Puget Sound Partnership,

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On behalf of everything from eelgrass to orcas.

From: Zena Hartung

Comment: Dear Puget Sound Partnership,

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From: Irene Hartzell

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From: Laura Harvell-Spehar

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From: Anne Harvey

Comment: Dear Puget Sound Partnership,

I am writing to urge you to improve your action agendas recommendations on pollution prevention. I am concerned about the health of this marine habitat and we must act now to address the impact of pollution, and to prevent pollution, as we are already looking at a very serious situation which must be reversed.

From: Margie Hatter

Comment: Dear Puget Sound Partnership,

I am writing to urge you to improve your action agendas recommendations on pollution prevention.

From: Lorena Havens

Comment: Dear Puget Sound Partnership,

I am writing to urge you to improve your action agendas recommendations on pollution prevention.

From: Johnnie Hawkins

Comment: Dear Leadership Council,

Thank you for the opportunity to comment on the Puget Sound Partnership Draft Action Agenda. I appreciate the tremendous amount of work that has gone into developing it and I support the strong list of measures that, if implemented, will go a long way toward recovering Puget Sound by 2020.

The draft plan includes a few omissions. The final plan should include Outstanding Resource Water (ORW) designation under the Clean Water Act as a tool to help protect rivers and other aquatic habitat. While I strongly support the inclusion of Wild and Scenic designation as a similar tool, in some cases ORW designation will likely prove to be a better, more immediate way for the state to ensure the protection of high quality rivers and other waters. Therefore, I urge the Partnership to include support for the Outstanding Resource Water designation as one of its "Near Term Actions." ORW designations permanently protect high quality waters that are ecologically significant, provide cold water refuges for fish, and/or support important recreational values. Many rivers in the Puget Sound region are eligible for ORW designation. I would also like to encourage you to include funds to move up the removal of the two dams on the Elwha from 2012 to 2010. Removal of the Elwha dams is one of the best chances for salmon and steelhead recovery in the region as it will open up over 70 miles of prime spawning habitat. Removing these dams has also been as a key action to recover our Puget Sound's orca population, which is malnourished thanks to a lack of chinook salmon.

Especially during difficult financial times, finding opportunities for economic benefit and job creation is important. Removing the Elwha dams provides a tremendous opportunity for creating "green jobs" and numerous other economic benefits.

Thank you for taking my comments into consideration.

From: Jenny Hayes

Comment: Dear Leadership Council,

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Especially during difficult financial times, finding opportunities for economic benefit and job creation is important. Removing the Elwha dams provides a tremendous opportunity for creating "green jobs" and numerous other economic benefits.

Thank you for taking my comments into consideration.

From: Robert Hayes

Comment: Dear Puget Sound Partnership,

Thank you for tackling the enormous challenge of saving Puget Sound head on. We appreciate your boldness and your efforts to engage the broader community, to listen to us and to base your decisions on science.

Surfrider Foundation is committed to supporting your efforts, primarily by encouraging people to get out in the watershed and into the Sound, to enjoy it, to appreciate it and to take action to protect and restore it. Through projects like Rise Above Plastics, beach clean ups and ocean friendly gardens, we will do our best to promote Sound stewardship practices.

In order to make sure that we reach our goal of a healthy Puget Sound by 2020, we ask that you strengthen the Action Agenda by incorporating the following recommendations:

- Be stronger on water quality measures by offering a comprehensive and robust program to

prevent all sources of stormwater pollution and strengthening the list of actions for toxic pollution prevention.

- Develop different indicators for human well-being to include more opportunity for quality water-based recreation through increased shoreline access, clean beaches, and clean water.

- Be stronger on accountability by incorporating clear benchmarks to get us to a healthy Puget Sound by 2020.

- Create more opportunities and stronger protection programs to improve the public's interaction with the shoreline and achieve enough water quality improvement and habitat restoration to inspire the public to go to the water's edge more frequently.

- Ensure that there is enough funding for Puget Sound to achieve the goals laid out in this ambitious agenda.

Thank you for your hard work to develop a draft Action Agenda to restore, protect and recover Puget Sound to health by 2020.

....Hey, surf's up. Years ago,in California,Oceanside, CA,at the beach, by the hotel. I was surfing. There was a mama orcha and her three babies,floating in the ocean water,about 1000 feet off the shore. I did not know they were killer whales. I surfed there about an hour. I'd look at the orchas,the mama would smile at me.

...I was told when I got back to shore by some fisherman there.

That was a killer whale, they thought I was going to get eaten.

.... I thought they were porpuses.

....So, apparently, orchas are surfer friendly.

From: BJ Hedahl

Comment: Dear Puget Sound Partnership,

Yeah, I cut and pasted; but only because I believe in all it says:

Please consider these points:

Benchmarks- Clearly identify benchmarks and sustained funding to get us to a healthy Puget Sound by 2020.

Sustained Funding- Clearly identify sustained funding to get us to a healthy Puget Sound by 2020.

Stormwater- Present a comprehensive program on stormwater that gives the roadmap, with benchmarks, for reducing stormwater pollution enough to achieve recovery of Puget Sound by 2020 and that addresses all sources of stormwater pollution ? municipal, industrial,

construction, roads, etc.;

Toxics- Significantly beef up toxic pollution prevention elements of the Action Agenda; Regulatory Tools- Offer improved regulatory tools for habitat protection, such as habitat standards that will achieve net gains in forest cover, riparian, nearshore and marine vegetation; New Funding- Describe in detail the new funding sources dedicated to Puget Sound that will be needed to fully implement the Action Agenda and achieve recovery by 2020.

Thank you for your hard work to develop a draft Action Agenda to restore, protect and recover Puget Sound to health by 2020. It could not come at a more pressing time, especially for the Sound's iconic and endangered orca whale. Just this month, researchers reported seven orcas "10% of the Puget Sound population" are missing and believed to be dead. Some experts say dwindling populations of endangered Chinook salmon are at least partly to blame. Is this a sign that our ecosystem is on the verge of collapsing?

The urgency of restoring the Sound to health is at a tipping point and missing orcas are the Sound's "canaries in the coal mine," telling us we are running out of time. But there is hope for the orca, as there was hope for the bald eagle, the California Condor and others on the verge of extinction. The Puget Sound Partnership's Action Agenda is a golden opportunity to do what has not been done for over 20 years- develop and implement a recovery plan that is accountable, effective, transparent and decisive with sustained funding to restore this national treasure to health by 2020.

The draft Action Agenda includes many of the essential elements that need to be done:

-Require low-impact development to reduce stormwater pollution;

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-Fund enforcement staff at state agencies and local governments;

-Implement specific, aggressive cleanup plans for polluted waters, including TMDLs;

-Fully fund a permanent year-round rescue tug at Neah Bay for oil spill prevention;

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-Set strong requirements for water quantity, such as setting in-stream flow for all major rivers.

BUT, more than a list of Soundwide and Action Area-specific actions, the Partnership must create a real 2020 Action Agenda, not just a 2-year plan, that clearly identifies the specific actions that are needed over the next 12 years and the HOW and WHO and BY WHEN each action must be completed. All the actions need to be tied together into a comprehensive plan with measurable benchmarks and timelines in order to achieve recovery by 2020. The final Action Agenda must:

-Clearly identify timelines and responsibilities;

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For Puget Sound!

From: Dave Heger

Comment: Dear Puget Sound Partnership,

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-Accelerate the restoration of the Elwha River.

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On behalf of everything from eelgrass to orcas.

From: George Heidorn

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For Puget Sound!

From: David Heimer

Comment: Invasive species- The plan mentions interdicting and combating new invaders, but doesn't do much to address/improve the current control efforts/needs. Although, some weeds (Spartina, knotweed) received the cursory mention, others, like reed canary grass and blackberry impact considerably more acreage along riparian corridors. Weed control/native-benefical plantings should be part of any improvement, restoration, or construction project.

Puget Sound Partnership
our Sound, our community, our choice

From: Rory Henneck

Comment: Dear Puget Sound Partnership,

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The Partnership must create a real 2020 Action Agenda, not just a 2-year plan, but a plan that clearly identifies the specific actions that are needed over the next 12 years and the HOW and WHO and BY WHEN each action must be completed. All the actions need to be tied together into a comprehensive whole through measurable benchmarks that must be accomplished in order to achieve recovery by 2020.

I especially would like to see efforts strengthened to enhance structures that protect water quality - artificial and natural, and regulate or phase out practices that degrade it, especially by offering cities incentives to stop paving at the rate we have been.

Thank you for this opportunity to strengthen a strategy to save Puget Sound. Let's do it right the first time.

From: Bernadette Henzi

Comment: Dear Puget Sound Partnership,

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On behalf of everything from eelgrass to orcas.

From: Wendy Hernandez

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For Puget Sound!

From: Joseph Herrin

Comment: Dear Puget Sound Partnership,

Please, enough of the studies and reports! Orca can't eat reports, they need clean water and plenty of salmon. I urge you to take positive action NOW. We know so much of what needs to be done - what we need is the political will to move forward right away.

From: Greg Herzberg

Comment: Dear Puget Sound Partnership,

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For Puget Sound!

From: B Herzog

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Accelerate the restoration of the Elwha River.

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On behalf of everything from eelgrass to orcas.

From: Judy Heydrick

Comment: I noticed that the Draft does not include Snohomish County foothill towns that are linked to Puget Sound by two category I Rivers-the Skykomish and the Snohomish and the multitude of streams that feed into these rivers. In 2005 the Skykomish River was voted the 4th most endangered river in America. Run away development was cited as the major threat to the river's considerable fish population and water quality. I strongly urge you to include these Cascade Foothill upland terrestrial areas in the Draft not only because they are geographically tied to Puget Sound through their watershed and aquatic habitats but also because they sorely need greater oversight and protections to remain healthy and viable.

From: Judy Heydrick

Comment: Dear Puget Sound Partnership,

Thank you for your hard work to develop a draft Action Agenda to restore, protect and recover Puget Sound to health by 2020. When it comes to restoring the health of the Puget Sound, where and how we grow matters. Especially in light of the one million new residents the state expects to welcome by 2020. It's more crucial than ever to focus that growth inside our urban areas so that we can preserve our farm and forest land and protect our rural areas to restore critical habitats and watersheds of the Sound.

While I applaud your effort thus far, the Action Agenda can and must go farther. We need a twenty year plan, not a two year plan. All the actions need to be tied together into a comprehensive plan with measurable benchmarks and timelines in order to achieve recovery by 2020.

As you finalize the final Action Agenda, please:

-Balance regulatory change with land acquisition to accomplish long term recovery goals;

-Take advantage of the region's recent vote to build 34 miles of new light rail - we must capitalize on this investment by requiring more intense development near these station areas that are pedestrian, bicycle and transit friendly;

-Identify adequate and sustained funding for the long haul;

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-Be based on science;

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involved in producing the draft Action Agenda. The next step is secure much needed funding. The 2009 legislature must adopt new funding sources dedicated to the recovery of Puget Sound by 2020.

For Puget Sound!

From: David Heywood

Comment: Dear Puget Sound Partnership,

I am writing to urge you to improve your action agenda's recommendations on pollution prevention. I want a healthy Puget Sound to be part of the legacy we leave our children.

Many Washington manufacturers continue to use harmful chemicals without any plans to switch to chemicals that are safer for Puget Sound. To protect public health and the environment, Washington's industry must begin phasing out of the worst toxic chemicals and developing plans to switch to safer alternatives.

Please include recommendations to help move Washington's businesses toward safer alternatives and away from chemicals known to be harmful to Puget Sound. These proposals should include:

Increasing the availability of technical assistance to help businesses reduce chemical use.

Developing a state program to focus on researching safer chemicals and materials.

Requiring better industry reporting to Ecology of the chemicals currently being used.

From: Bobbi Hickox

Comment: Dear Puget Sound Partnership,

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From: Carolyn Higgins

Comment: Dear Puget Sound Partnership,

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and BY WHEN each action must be completed. All the actions need to be tied together into a comprehensive whole through measurable benchmarks that must be accomplished in order to achieve recovery by 2020.

Thank you for this opportunity to strengthen a strategy to save Puget Sound.

From: Wade Higgins

Comment: Dear Puget Sound Partnership,

The health of the Sound depends in part on the health of the rivers which flow into the Sound. I am somewhat familiar with the Middle Green River. Despite the fact that salmon and steelhead have to spend parts of their lives in the Duwamish river, one of the northwest's most polluted waterways, anadromous fish populations are relatively healthy in the Middle Green.

I'm convinced that part of the reason for this is that with the exception of Newaukum Creek, much of the inflow to the Middle Green is from groundwater, in particular large magnitude springs in the Green River Gorge as well as spring fed streams downstream of the Gorge such as Crisp Creek,. This water is clean and cold and provides a boost to spawning salmon and steelhead.

The gist of my comment is that the Puget Sound Partnership must pay attention to the importance of preserving and protectiong groundwater resources.

In the Middle Green at least, groundwater is a significant component of river flow. Thus ultimately it affects the ecology of Puget Sound.

From: Thomas Hildebrandt

Comment: Dear Puget Sound Partnership,

Thank you for your commitment to developing an Action Agenda for a healthy Puget Sound. From struggling orcas to toxic chemicals in our water, the Sound needs quick and decisive action today. I want to make sure we pass a thriving Puget Sound on to future generations.

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From: Curtis Hinman

Comment: Comments below are focused on stormwater and application of LID

--Agenda provides some good basic actions.

--Many of the action items are already being implemented in Puget Sound.

--New PCHB decision will direct attention to determining where LID is considered feasible and Phase 1 communities are currently debating that question. Action agenda should include convening a science group to provide guidelines that are scientifically based rather than guidelines primarily driven by existing code, guidelines, and jurisdictional and professional bias.

--The next step for improved stormwater management is applying the LID approach at the watershed scale (can be small watershed scale...i.e. small creek). So, identify developed area pilot and and undeveloped or green field pilot and measure stream or wetlands response to application of LID. Seattle has already started this process, but is lacking funds to continue.

--Encourage the creation of a pilot zone for the application of newest LID technologies to promote demonstration and innovation. Kitsap County and Bremerton have already proposed this and we should support their willingness to innovate.

--Support the continued development of an LID center for research, but also demonstration, outreach and training (WSU is in the process of developing a center in central Puget Sound, but funding is necessary to continue operation). A center can act as a place to test technology and train designers in the latest application and science.

From: Rick Hirschberg

Comment: There is a disconnect between your analysis of the problems and the action agenda. On page 6 of the introduction, you say that "The number one contributor to the decline in Puget Sound is all the harmful and toxic chemicals we add to the water....". Yet, in the action agenda, your number one priority is habitat preservation. Eliminating toxic and harmful chemicals is down the list at number three. The action agenda should match the ranking of the problems.

From: Amie Hirsche

Comment: Nothing on leaking underground storage tanks. The silent problem no one knows about...

From: Eric Hirst

Comment: Dear Puget Sound Partnership,

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From: Jennifer Hisrich

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Many Washington manufacturers continue to use harmful chemicals without any plans to switch to chemicals that are safer for Puget Sound. To protect public health and the environment, Washington's industry must begin phasing out of the worst toxic chemicals and developing plans to switch to safer alternatives.

Please include recommendations to help move Washington's businesses toward safer alternatives and away from chemicals known to be harmful to Puget Sound. These proposals should include:

Increasing the availability of technical assistance to help businesses reduce chemical use.

Developing a state program to focus on researching safer chemicals and materials.

Requiring better industry reporting to Ecology of the chemicals currently being used.

We need to act immediately to save the remaining whales.

From: Jennifer Hisrich

Comment: Dear Puget Sound Partnership,

Thank you for your commitment to developing an Action Agenda for a healthy Puget Sound. From struggling orcas to toxic chemicals in our water, the Sound needs quick and decisive action today. I want to make sure we pass a thriving Puget Sound on to future generations.

I urge the Partnership to incorporate accountability, benchmarks of success, and ample funding into this Agenda.

The draft Action Agenda includes many of the essential elements that need to be accomplished, but in addition, the final Action Agenda must also:

-Amend the Cruise Ship MOU to ban all cruise ship discharges in Puget Sound;

-Prioritize the protection and restoration of the State's forage fish spawning beds;

-Complete the Management Plan for the Cherry Point Aquatic Reserve;

-Identify adequate and sustained funding for Plan implementation;

-Update the guidance for open water dredge disposal of PCBs;

-Expand the indicator species to include forage fish abundance and harbor seal toxics loading; and

-Accelerate the restoration of the Elwha River.

Thank you for your hard work to develop a draft Action Agenda to restore, protect and recover Puget Sound to health by 2020.

On behalf of everything from eelgrass to orcas.

From: Jennifer Hisrich

Comment: Dear Puget Sound Partnership,

Thank you for your hard work to develop a draft Action Agenda to restore, protect and recover Puget Sound to health by 2020. It could not come at a more pressing time, especially for the Sound's iconic and endangered orca whale. Just this month, researchers reported seven orcas "10% of the Puget Sound population" are missing and believed to be dead. Some experts say dwindling populations of endangered Chinook salmon are at least partly to blame. Is this a sign that our ecosystem is on the verge of collapsing?

The urgency of restoring the Sound to health is at a tipping point and missing orcas are the Sound's "canaries in the coal mine," telling us we are running out of time. But there is hope for the orca, as there was hope for the bald eagle, the California Condor and others on the verge of extinction. The Puget Sound Partnership's Action Agenda is a golden opportunity to do what has not been done for over 20 years- develop and implement a recovery plan that is accountable, effective, transparent and decisive with sustained funding to restore this national treasure to health by 2020.

The draft Action Agenda includes many of the essential elements that need to be done:

-Require low-impact development to reduce stormwater pollution;

-Prohibit new bulkheads near feeder bluffs and forage fish spawning beaches;

-Fund local governments to develop and carry out shoreline master programs;

-Fund enforcement staff at state agencies and local governments;

-Implement specific, aggressive cleanup plans for polluted waters, including TMDLs;

-Fully fund a permanent year-round rescue tug at Neah Bay for oil spill prevention;

-Acquire critical intact parcels for habitat protection and conservation;

-Set strong requirements for water quantity, such as setting in-stream flow for all major

rivers.

BUT, more than a list of Soundwide and Action Area-specific actions, the Partnership must create a real 2020 Action Agenda, not just a 2-year plan, that clearly identifies the specific actions that are needed over the next 12 years and the HOW and WHO and BY WHEN each action must be completed. All the actions need to be tied together into a comprehensive plan with measurable benchmarks and timelines in order to achieve recovery by 2020. The final Action Agenda must:

-Clearly identify timelines and responsibilities;

-Identify adequate and sustained funding for the long haul;

-Be a visionary and long term plan;

-Be based on science;

-Offer a comprehensive and robust program to prevent all sources of stormwater pollution, not just municipal stormwater;

-Strengthen the list of actions for toxic pollution prevention;

-Set meaningful standards for habitat protection;

-Balance regulatory change with land acquisition to accomplish long term recovery goals;

-Expand the indicator species to include more than just salmon, i.e. forage fish, harbor seals, etc.

The Partnership staff, the Leadership Council, Ecosystem Coordinating Board, Science Panel and stakeholders throughout the Sound deserve praise for the monumental effort involved in producing the draft Action Agenda. The next step is secure much needed funding. The 2009 legislature must adopt new funding sources dedicated to the recovery of Puget Sound by 2020.

We love to sail the sound and take the ferry and it wouldn't be the same on dead polluted water.

For Puget Sound!

From: Nancy A (Nan) Hogan

Comment: Dear Puget Sound Partnership,

Thank you for your hard work to develop a draft Action Agenda to restore, protect and recover Puget Sound to health by 2020. It could not come at a more pressing time, especially for the Sound's iconic and endangered orca whale. Just this month, researchers reported seven orcas "10% of the Puget Sound population" are missing and believed to be dead. Some experts say dwindling populations of endangered Chinook salmon are at least

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For Puget Sound!

From: Nancy A (Nan) Hogan

Comment: Let's just do it! Now! No more time wasted!

From: Joyce Hoikka

Comment: Dear Puget Sound Partnership,

Thank you for your hard work to develop a draft Action Agenda to restore, protect and recover Puget Sound to health by 2020. When it comes to restoring the health of the Puget Sound, where and how we grow matters. Especially in light of the one million new residents the state expects to welcome by 2020. It's more crucial than ever to focus that growth inside our urban areas so that we can preserve our farm and forest land and protect our rural areas to restore critical habitats and watersheds of the Sound.

While I applaud your effort thus far, the Action Agenda can and must go farther. We need a twenty year plan, not a two year plan. All the actions need to be tied together into a comprehensive plan with measurable benchmarks and timelines in order to achieve recovery by 2020.

As you finalize the final Action Agenda, please:

-Balance regulatory change with land acquisition to accomplish long term recovery goals;

-Take advantage of the region's recent vote to build 34 miles of new light rail - we must capitalize on this investment by requiring more intense development near these station areas that are pedestrian, bicycle and transit friendly;

-Identify adequate and sustained funding for the long haul;

-Clearly identify timelines and responsibilities;

-Be based on science;

-Set meaningful standards for habitat protection.

The Partnership staff, the Leadership Council, Ecosystem Coordinating Board, Science Panel and stakeholders throughout the Sound deserve praise for the monumental effort involved in producing the draft Action Agenda. The next step is secure much needed funding. The 2009 legislature must adopt new funding sources dedicated to the recovery of Puget Sound by 2020.

From: C Holmes

Comment: Dear Puget Sound Partnership,

Thank you for tackling the enormous challenge of saving Puget Sound head on. We appreciate your boldness and your efforts to engage the broader community, to listen to us and to base your decisions on science.

Surfrider Foundation is committed to supporting your efforts, primarily by encouraging people to get out in the watershed and into the Sound, to enjoy it, to appreciate it and to take action to protect and restore it. Through projects like Rise Above Plastics, beach clean ups and ocean friendly gardens, we will do our best to promote Sound stewardship practices.

In order to make sure that we reach our goal of a healthy Puget Sound by 2020, we ask that you strengthen the Action Agenda by incorporating the following recommendations:

- Be stronger on water quality measures by offering a comprehensive and robust program to prevent all sources of stormwater pollution and strengthening the list of actions for toxic pollution prevention.

- Develop different indicators for human well-being to include more opportunity for quality water-based recreation through increased shoreline access, clean beaches, and clean water.

- Be stronger on accountability by incorporating clear benchmarks to get us to a healthy Puget Sound by 2020.

- Create more opportunities and stronger protection programs to improve the public's interaction with the shoreline and achieve enough water quality improvement and habitat restoration to inspire the public to go to the water's edge more frequently.

- Ensure that there is enough funding for Puget Sound to achieve the goals laid out in this ambitious agenda.

Thank you for your hard work to develop a draft Action Agenda to restore, protect and recover Puget Sound to health by 2020.

Many things adversely impact the Sound.

One is the number of septic systems built to standard design.

Septic systems as we understand them, are guaranteed to fail, because they ALL become anaerobic shortly after being closed in.

Cultures that proliferate without oxygen dominate; these can move long distances

underground and in water tables.

One simple, viable solution is to mandate addition of a retrofit system like the Sludgehammer. This add-on system bubbles in air and adds aerobic cultures.

These grow only within the septic system; cannot live without the air source pumped into the system. They clean out and rehabilitate the septic systems [even totally clogged ones], but most importantly, stop them from polluting ground and water.

WA Department of Health has dragged their collective feet too long on getting rules changed to more easily adopt better technologies, be they old, new, or simple, as long as they work better and are cost-effective.

We need easy adoption of better technologies; none can afford to let any industry strangle or stagnate the systems in our State at the expense of the environment.

As the health of waters and earth go, so goes everyone else.

Getting healthier is Past Due.

From: T Holt

Comment: Dear Puget Sound Partnership,

I am writing to urge you to improve your action agendas recommendations on pollution prevention.

From: Tom Holz

Comment: SEED Project Funding The SEED project did not receive a DOE grant. If constructed it would be the world's first industrial project built to the 65/10/0 standard for low impact development. It is probably the most important project for PSP support of any in the state. It is well recognized that end-of-pipe stormwater management is a total failure after over 5 decades of experience. All senior planners and hydrologists in the state are now aware that low impact development is the only hope that we have for saving the last vestiges of healthy streams in watersheds that are destined for development. In the Department of Ecology's 2005 Stormwater Management Manual for Western Washington it is stated clearly that without serious changes in the way we develop land we can expect further decline in stream habitat quality and health of Puget Sound (Section 1.7, Volume I). But even after nearly 10 years since Lacey became the first jurisdiction to pass an ordinance allowing development meeting the full-dispersion standard, not a single such project has been built in Lacey or in Washington. This after pleading with developers by officials in Lacey, King County, Snohomish County, Pierce County, and Tumwater to do a pilot project. Please add this project to those recommended for early implementation.

Puget Sound Partnership
our community, our chance

From: Tom Holz

Comment: Thank you for the opportunity to provide our input to the process to recover the Puget Sound ecosystem by 2020. We have also submitted these comments through your website except that it does not appear that the website accepts attachments.

We have contributed comments and submitted letters to the Puget Sound Partnership since May 2005. Our comments and letters have consistently identified the minimum steps to address stormwater runoff, a major source of stress to the Puget Sound ecosystem. To our disappointment, the latest draft plan does not include these minimum steps. Nor does the Plan embrace the strategy, suggested in our letter dated 09/25/08, of balancing the impacts of new development (constructed to the highest possible LID standard) with LID redevelopment in already urbanized areas. (Previous letters attached.)

Our prediction is that the proposed Action Agenda, if adopted as is, will not halt nor even slow the decline in the health of the Puget Sound ecosystem by 2020. We urge you to reconsider and again offer our help toward restructuring the plan.

From: Tom Holz

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Our prediction is that the proposed Action Agenda, if adopted as is, will not halt nor even slow the decline in the health of the Puget Sound ecosystem by 2020. We urge you to reconsider and again offer our help toward restructuring the plan.

Sincerely, Douglas Beyerlein, Professional Hydrologist and Professional Engineer Susan Bolton, Ph.D., Professional Engineer Derek B. Booth, Ph.D., Professional Engineer and Professional Geologist Thomas W. Holz, Professional Engineer Thomas Hooper, Fisheries Biologist Richard R. Horner, Ph.D., Environmental Engineering Research James R. Karr, Ph.D., Ecologist DeeAnn Kirkpatrick, Fisheries Biologist John Lombard, Planner and Environmental Policy Analyst Christopher W. May, Ph.D. Gary Minton, Ph.D., Professional Engineer David R. Montgomery, Ph.D., Professor of Geomorphology Dave Somers, Fisheries Biologist Cleve Steward, Fisheries Biologist

October 26, 2006

Puget Sound Partnership
c/o Puget Sound Action Team,
P.O. Box 40900
Olympia, WA 98504-0900

Dear Puget Sound Partners

SUBJECT: PARTNERSHIP RECOMMENDATIONS TO:

IMPROVE WATER QUALITY AND HABITAT BY MANAGING STORMWATER RUNOFF

PROTECT ECOSYSTEM BIODIVERSITY AND RECOVER IMPERILED SPECIES

PROVIDE WATER FOR PEOPLE, FISH AND WILDLIFE, AND THE ENVIRONMENT

We, the undersigned members of Washington State's scientific community, have been studying impacts of urbanization on habitat and aquatic life for decades. There is a large body of literature regarding the relationship of urban runoff and the health of waterbodies. We have had the privilege of contributing papers describing the status and trends in Northwest rivers, wetlands, and coastal environments, the impacts of urban runoff (and other effects of human activities on Puget Sound waters), the effectiveness of mitigation measures, and original and effective methods for monitoring waterbody health. All undersigned have credentials to comment on effective approaches for urban runoff management.

These comments are in response to preliminary recommendations by the Puget Sound Partnership, dated October 2006, for action to preserve and recover Puget Sound.

IMPORTANCE OF STORMWATER RUNOFF MANAGEMENT IN THE PUGET SOUND BASIN

Urban runoff scours streams, destroys aquatic life characteristic of a healthy ecosystem, and carries enormous loads of contaminants to Puget Sound. Stormwater is most likely a primary source of destructive flows and contaminants leading to the precipitous decline in the health of the Puget Sound ecosystem.

Because of urbanization, peak stormwater flows can increase stream discharge by factors of up to 10-fold over predevelopment peaks. Annual flow volumes can double.

Contaminants in and volumes of urban runoff discharged to streams change the types and numbers of aquatic species, changes that are key signals of declining ecological health.

The decline in stream health begins with the clearing of the forest and modification of river channels in a watershed. Stream flow usually increases dramatically after clearing and often streams are devastated even before any development takes place. Every square foot of effective impervious surface then added to a watershed counts further toward the stream's decline. ("Effective" impervious area is that connected by a conveyance system to surface water.) With the first increments of effective impervious area in a watershed, the numbers of the most sensitive species decline dramatically. Contrary to popular dogma, there is no threshold of development below which there will be no biological degradation.

Although all groups of aquatic organisms are affected by the actions of humans, anadromous fish in our region are the most widely understood and appreciated species that suffer enormously in streams draining urbanized watersheds. Salmon and sea-run cutthroat trout spawned and nurtured in Puget Sound's streams are important for several reasons: regional icons, contributors to regional economies, and key players in the food webs that range from mountain forests to the health of Puget Sound orcas. In short, a healthy Puget Sound depends on a healthy regional biota, especially anadromous fish populations.

END-OF-PIPE TREATMENT AND DETENTION DISCREDITED

"End-of-Pipe" management of stormwater refers to the practice of treating and detaining runoff from urban land uses before discharging it to surface water. Underlying the employment of end-of-pipe management is the assumption that forested watersheds can be converted to any type of land use (including 100% impervious) and that the impacts of these changes on receiving waters can be negated through the use of engineered stormwater-management hardware.

The prescriptions and methods for design of such hardware are found in drainage design manuals in use by every jurisdiction in the basin. An example of such a manual is the DOE's "Stormwater Management Manual for Western Washington". Newly written NPDES permits require that jurisdictions use this manual (or its equivalent) in mitigating for urban runoff. However, the DOE manual itself disavows claims to protect aquatic life. From Volume 1, Section 1.7.5: …*land development as practiced today is incompatible with the achievement of sustainable ecosystems*. And also from Volume 1, Section 1.7.5: *The engineered stormwater … systems advocated by this and other stormwater manuals … cannot replicate … hydrologic functions of the natural watershed that existed before development, nor can they remove sufficient pollutants to replicate the water quality of predevelopment conditions*.

End-of-pipe stormwater management has been and continues to be a failure at adequately protecting streams, wetlands, and Puget Sound. The literature in the past 30 years documents the negative effects of stormwater discharges on receiving waters.

In the past 5 years several papers have been published describing the marginal differences in stream damage between those watersheds where treatment and detention is installed and those where discharges are unmitigated. Hydrological studies are available that show that no amount of end-of-pipe mitigation can protect streams from urban runoff. In short, conversion of forests to traditional urban land uses cannot be mitigated by end-of-pipe prescriptions.

Since 1996, the correlation between urbanization (and concomitant decline in forest cover, loss of stream buffers, new impervious area) and stream health has been documented in detail. It is now possible to predict, with considerable confidence, the ill-effect of continuing urbanization on the last vestiges of healthy streams in the basin if such development follows the same formula employed in the past.

THE PARTNERSHIP LEANS ON FAILED PRACTICES FOR PROTECTION

The following is the stormwater recommendation from the latest draft of Puget Sound Partners recommendations (dated October 2006):

> *1. Issue NPDES Phase I and Phase II permits that brings 80% of the Puget Sound's population (and some 80 cities) into active stormwater management. Also:*
>
> > *a. Implement a coordinated water quality monitoring program.*
> > *b. Expand programs to maximize stormwater infiltration.*
> > *c. Promote a basin approach to stormwater by sponsoring pilot projects.*
> > *d. Increase funding for Low Impact Development (LID) demonstration projects and develop incentives to encourage the use of LID.*

The Partnership recommendation to issue NPDES permits is unnecessary in that this will be done regardless of Partnership stance.

Furthermore it is widely known that NPDES offers little hope of protecting streams and Puget Sound. NPDES permits issued by Washington State require only that permittees adhere to the state's "Stormwater Management Manual for Western Washington", a set of prescriptions for end-of-pipe engineering hardware. The manual recognizes that end-of-pipe engineering will not protect streams and source control is necessary (Volume 1). But, in the subsequent volumes containing its prescriptions, the manual is silent about the advisability of conversion of forests to intense forms of land use. The manual allows development projects that convert up to 100% of a forested site to impervious area. The manual's prescriptions are concerned only with sizing of hardware. The scientific literature demonstrates that it is not possible to fully mitigate for any such conversions regardless of hardware size.

The Partnership should not expect that NPDES or continued end-of-pipe management of runoff will lead to the protection or recovery of Puget Sound.

Encouraging infiltration (in the absence of LID standards) is meaningless ("*b*." above). For traditional high-impact development, jurisdictions disallow infiltration on till soils. Encouragement to "maximize" infiltration will not make soils more porous. And the Partnership should not be "encouraging" anything. The Partnership should be describing practices and standards that are vital to Sound recovery and recommending that they be implemented and enforced.

More low impact development pilot and demonstration projects, at best, will delay essential action ("*c*" and "*d*." above). We have sufficient experience with traditional end-of-pipe stormwater management to know that it is not an alternative and we must turn from it as quickly as possible. Sufficient projects have been constructed to show that LID projects can be successful at retaining runoff on project site. To recommend more such projects (in the absence of action to introduce changes into development code to require them) reflects unjustifiable timidity in the face of great danger to the Sound. Moreover, the Partnership recommendation for incentives ("d" above) to abide by LID standards, in the absence of regulations to force such changes, is destined to fall far short of the goal to protect and restore Puget Sound.

We regrettably conclude that, if the above is the extent of the Partnership recommendations regarding stormwater, little hope should be held for restoration of Puget Sound. Indeed it is far more likely, with the arrival of millions more newcomers and concomitant high-impact development, that the health of Puget Sound will continue in its precipitous decline.

PRACTICES THAT MUST BE IMPLEMENTED IF PUGET SOUND IS TO BE SAVED

Science supports the following actions and practices related to land use as necessary to halt the decline of Puget Sound ecosystem, provide for recovery of anadromous fish, halt the increase in and reduce the load of pollutants carried by stormwater to Puget Sound, and begin the steep climb toward restoration. This list is not all-inclusive. It is left to others to urge the many other action items needed to restore Puget Sound and other regional water bodies to healthy condition.

1. **Preserve Existing Least-Disturbed Watersheds and Subwatersheds**. The scientific literature is clear that the healthiest and most biologically productive streams are found in undisturbed watersheds. Very small levels of disturbance in the healthiest watersheds immediately start their inevitable biological or ecological decline, beginning with the loss of their most sensitive species, to decline in predators and to the increase in the most tolerant species.

Such watersheds and associated streams should be set aside and protected from disturbance. If we are serious about preserving Puget Sound, we must identify those watersheds that we can characterize as in good or excellent condition and preserve them. The means employed for preservation must ensure that it is certain and permanent.

2. **No Net Loss of Forest Cover in the Puget Sound Basin**. Forest loss must be limited in the process of conversion to urban purposes, and such loss must be balanced by increasing/restoring forest cover in disturbed areas within the basin.

   Forest loss owing to new development should be limited through development code. An example of such code can be found in DOE's "Stormwater Management Manual for Western Washington", Volume V, BMP T5.30. The Partnership should recommend that this code be used to guide all new development.

   To mitigate for the fraction of forest cleared in each new development (i.e. the fraction not preserved by code), the Partnership should recommend a program of clearing trading rights. Such a program would ensure that for each portion of a site cleared for development an equivalent forest area is restored elsewhere in the basin. (Forest restoration in disturbed areas can be affected by a variety of programs. Restoration of buffers along urban streams is an example.)

3. **Halt Runoff From New Impervious Area in the Puget Sound Basin**. Methods for eliminating runoff from impervious surfaces include (but are not limited to) using pervious paving materials, associating impervious area with bioretention facilities, reducing such areas to functional minimums, and so on.

   The Partnership should recommend code changes requiring that most new paving and roofing be constructed using materials and practices to prevent them from generating runoff to surface water.

   These methods are some of the tools in the practice of "low impact development".

4. **Preserve Existing and Restore Destroyed Buffer Areas Adjacent to Streams**. Destroyed buffers are often found in private ownership. The Partnership should recommend that these be purchased, or otherwise protected, and that soil and riparian vegetation be restored. The protection of Puget Sound as a public good requires creative approaches to these activities. The Partnership should recommend that jurisdictions adopt a system of prioritization of stream buffers to be restored and a time table for restoration. Obviously, restoration of existing problem-buffers may take decades; even so, the Partnership should set reasonable targets for buffer restoration for year 2020 and other milestone dates.

5. **Reduce the Amount of Runoff From Existing Impervious Area**. Much existing impervious area is unnecessary and should be removed. (For example, two-way streets could be converted to one-way and a lane eliminated.) Existing impervious area could be disconnected from surface water by repaving using pervious materials or bordering with bioretention facilities or both.

   The Partnership should recommend a program of prescriptions and incentives to reduce existing total and effective impervious area.

The Puget Sound Partnership has a daunting task and carries the burden of responsibility for the fate of the basin's ecosystem. We the undersigned applaud the effort, and offer our services in making the best possible recommendations to the Governor.

Sincerely,

Douglas Beyerlein, Professional Hydrologist and Professional Engineer
Susan Bolton, PhD, Professional Engineer
Derek B. Booth, PhD, Professional Engineer and Professional Geologist
Thomas W. Holz, Professional Engineer
Thom Hooper, Fisheries Biologist
Richard R. Horner, PhD, Environmental Engineering Research
James R. Karr, PhD, Ecologist
DeeAnn Kirkpatrick, Fisheries Biologist
John Lombard, Planner and Environmental Policy Analyst
Christopher W. May, PhD
Gary Minton, PhD, Professional Engineer
David R. Montgomery, PhD, Professor of Geomorphology
David Somers, Fisheries Biologist
Cleve Steward, Fisheries Biologist

PugetSoundPartnership
our sound, our community, our shared

September 25, 2008

Mr. David Dicks
Executive Director
Puget Sound Partnership
P.O. Box 40900
Olympia, Washington 98504-0900

Dear Mr. Dicks:

As your staff works to finalize a public review draft of the Partnership's proposed Action Agenda for Puget Sound, we ask that you take bold action – as Governor Gregoire has directed – to effect a dramatic improvement in the health of the Sound. As longstanding members of Washington State's scientific community, we have witnessed the failure of past initiatives that promised much but did little to reverse the downward trend in environmental quality of our cherished estuary. We sincerely hope that the result of the current initiative will accomplish this goal, and it is in that spirit that we offer these comments.

As a group, we previously made our views known in a letter (October 26, 2006) to the Partnership's predecessor Advisory Commission. Individual members of our group have also worked directly with the Partnership staff and committees to identify and address key concerns. In this letter, as in our previous one, our comments are focused on stormwater—certainly not the only important issue before the Partnership, but one that is central to success, and one on which we collectively have considerable expertise. We stand ready to work with you to clarify and elaborate the thinking summarized in this letter.

The current abuse of land and water resources must be drastically reduced if we hope to ensure a healthy Puget Sound. This requires us to reduce impervious surface that impairs the hydrology of streams, restrict new clearing and development that would harm remaining undisturbed habitats, restore and conserve healthy living systems, and, to the extent possible, eliminate discharge of pollutants. This requires significant changes in policies, law, and behavior that would continue long after our generation is gone.

Undoing the harm of ongoing land use practices and preventing further degradation from new development requires a fundamental commitment to implementing low-impact development practices throughout the region. This involves not only structural solutions (e.g., pervious pavement, rain gardens, green roofs) but also operational and design choices (e.g., water harvesting, preservation of soils and vegetation). Although not every method of low-impact development is appropriate in every circumstance, taken as a whole, LID practices are both more effective and much preferred over existing methods used to treat stormwater. Some may argue

that these practices are untested, too expensive, or ill-suited to urban areas and the till soils of our region, but the record emphatically suggests otherwise; the success of LID techniques and practices is well documented, both locally and around the world. If other agencies, institutions, organizations or individuals assert otherwise, we hope the Partnership will provide a forum for interested parties to examine the factual record and debate the merits of opposing views.

Stopping the degradation associated with new development is necessary to reverse past trends and successfully restore the Sound, but it is not enough. We must also rehabilitate existing disturbed areas. Incentives should be provided to induce residents and businesses to voluntarily restore the hydrologic integrity of their land. However, incentives and ad hoc approaches to restoration are unlikely to prove sufficient; the severity of the problem demands the investment of resources at an unprecedented scale.

Clearly, recovery of the Puget Sound ecosystem requires *both* ending ongoing losses of habitat and aquatic life from new development *and* rehabilitating areas that have already been developed. We remind the Partnership that this recovery must be measured not by the amount of money spent, laws promulgated, BMPs installed, numerical water-quality criteria focusing on chemical pollutants, or administrative milestones, but by the presence of living systems that are the surest indicator of our success at attaining the ecological health goals articulated in Partnership documents. The public will accept nothing less than that the ecological health goals have been met.

Based on consideration of the foregoing stormwater management issues, we recommend that several concrete actions be accorded special status in the Action Agenda. All of these actions have been articulated by multiple groups on numerous occasions over the past several years, but nonetheless bear repeating:

- Protect existing high-quality habitat, the “last best places” in the Puget Sound watershed;
- Replant forests and restore wetlands and riparian environments throughout the Puget Sound watershed;
- Control inputs of toxic consumer products at the local and/or state level;
- Adopt LID as a mandatory element of state and local stormwater codes for new development;
- Begin progressive retrofitting of developed areas (i.e., existing urban and suburban areas) to reduce their negative effects on Puget Sound and associated water bodies;

- Integrate land-use codes and land-use decisions into an overall strategy for protection of Puget Sound; and

- Implement a program of adaptive management to ensure that clearly articulated assumptions about the response of the ecosystem to our management efforts can be tested, and our efforts subsequently modified for greatest effectiveness.

These seven actions are grounded in the broad understanding that degradation of the Puget Sound ecosystem is fundamentally an expression of land-use practices and the policies and laws that enable them.

The Puget Sound Partnership faces enormous challenges. In the interest of bequeathing a healthy Puget Sound ecosystem to future generations, we call upon the scientific community and, specifically, offer our own services to help the Partnership meet those challenges. We feel strongly that recent advances in scientific understanding and practical experience can be effectively applied to address the problems confronting us. Above all, we do not want to bear collective witness to another failed attempt to restore and protect Puget Sound. If we can succeed in reversing current trends, we will provide a much-needed example to the world of how a highly developed society can find a way to prosper by protecting the environment upon which it depends.

Sincerely,

Douglas Beyerlein, Professional Hydrologist and Professional Engineer
Susan Bolton, Ph.D., Professional Engineer
Derek B. Booth, Ph.D., Professional Engineer and Professional Geologist
Thomas W. Holz, Professional Engineer
Thomas Hooper, Fisheries Biologist
Richard R. Horner, Ph.D., Environmental Engineering Research (TO BE CONFIRMED)
James R. Karr, Ph.D., Ecologist
DeeAnn Kirkpatrick, Fisheries Biologist
John Lombard, Planner and Environmental Policy Analyst
Christopher W. May, Ph.D.
Gary Minton, Ph.D., Professional Engineer
David R. Montgomery, Ph.D., Professor of Geomorphology
Cleve Steward, Fisheries Biologist

From: Matthew Hornland

Comment: Dear Puget Sound Partnership,

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From: Derek Hoshiko

Comment: Dear Puget Sound Partnership,

With the leadership that the Puget Sound Partnership is offering, I am hopeful that the Action Agenda will result in truly achieving the shared vision of a healthy Puget Sound by 2020. Moreover, I am hopeful as well that this partnership will be a model for how to do other large-scale, cross-sectoral collective actions! I support People For Puget Sound's comments written below as well. –

Thank you for your hard work to develop a draft Action Agenda to restore, protect and

recover Puget Sound to health by 2020. It could not come at a more pressing time, especially for the Sound's iconic and endangered orca whale. Just this month, researchers reported seven orcas "10% of the Puget Sound population" are missing and believed to be dead. Some experts say dwindling populations of endangered Chinook salmon are at least partly to blame. Is this a sign that our ecosystem is on the verge of collapsing?

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For Puget Sound!

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From: Keith Houser

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While I applaud your effort thus far, the Action Agenda can and must go farther. We need a twenty year plan, not a two year plan. All the actions need to be tied together into a

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As you finalize the final Action Agenda, please:

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From: Brandon Houskeeper

Comment: I have been looking at the Action Agenda and wanted to ask a quick question: Why are the near-term priorities from Priority E not included in the Implementation table found with Question 4: Where do we start?

From: Brandon Houskeeper

Comment: One follow-up question. If I understand correctly, the Priorities A-E are in that order based on PSP's ranking of priorities. Is that correct? If so, does that mean that priorities would be the funded in that order if PSP did not get all of the funding they are asking for?

From: Colleen Howe

Comment: Greetings, Several years ago I started a Free Tree give away project at my nursery to do my very small part towards cleaning the air, cutting down run off and providing habitat for critters. I also became the first nursery to be certified organic by WSDA. The nursery industry can be toxic and they need to join in on this project.The government has nurseries that could help. It is about the most significant way millions of people could help with the enormous problem of global warming and species die off in my opinion.

From: M Howell

Comment: Dear Puget Sound Partnership,

Thank you for your commitment to developing an Action Agenda for a healthy Puget Sound. From struggling orcas to toxic chemicals in our water, the Sound needs quick and decisive action today. I want to make sure we pass a thriving Puget Sound on to future generations.

I urge the Partnership to incorporate accountability, benchmarks of success, and ample funding into this Agenda.

The draft Action Agenda includes many of the essential elements that need to be accomplished, but in addition, the final Action Agenda must also:

-Amend the Cruise Ship MOU to ban all cruise ship discharges in Puget Sound;

-Prioritize the protection and restoration of the State's forage fish spawning beds;

-Complete the Management Plan for the Cherry Point Aquatic Reserve;

-Identify adequate and sustained funding for Plan implementation;

-Update the guidance for open water dredge disposal of PCBs;

-Expand the indicator species to include forage fish abundance and harbor seal toxics loading; and

-Accelerate the restoration of the Elwha River.

Thank you for your hard work to develop a draft Action Agenda to restore, protect and recover Puget Sound to health by 2020.

On behalf of everything from eelgrass to orcas.

From: Robert Hrycenko

Comment: Looking at the history (extraction-based), leadership (????-NONE!), motivation ($$$$$ - unbridled greed) and all the empty talk - to say nothing of the State's partnership with every filthy industry imaginable, and Victoria BC gross pollution, I have zero confidence any meaningful progress will ever occur. The Natives use gill nets to scour the rivers (still hungry for more profits despite all their casinos?), the Seattle fleet rapes the coastal waters and those of Alaskan (120,000 illegally harvested Chinook and killer ships); local fishermen must use 'single, barbless hooks.' In 4 years, I have never caught a salmon in Puget Sound. Yes, Divine Intervention' is the only prayer for Puget Sound.

From: Laura Huddlestone

Comment: Dear Leadership Council,

Thank you for the opportunity to comment on the Puget Sound Partnership Draft Action Agenda. I appreciate the tremendous amount of work that has gone into developing it and I support the strong list of measures that, if implemented, will go a long way toward recovering Puget Sound by 2020.

The draft plan includes a few omissions. The final plan should include Outstanding Resource Water (ORW) designation under the Clean Water Act as a tool to help protect rivers and other aquatic habitat. While I strongly support the inclusion of Wild and Scenic designation as a similar tool, in some cases ORW designation will likely prove to be a better, more immediate way for the state to ensure the protection of high quality rivers and other waters. Therefore, I urge the Partnership to include support for the Outstanding Resource Water designation as one of its "Near Term Actions." ORW designations permanently protect high quality waters that are ecologically significant, provide cold water refuges for fish, and/or support important recreational values. Many rivers in the Puget Sound region are eligible for ORW designation. I would also like to encourage you to include funds to move up the removal of the two dams on the Elwha from 2012 to 2010. Removal of the Elwha dams is one of the best chances for salmon and steelhead recovery in the region as it will open up over 70 miles of prime spawning habitat. Removing these dams has also been as a key action to recover our Puget Sound's orca population, which is malnourished thanks to a lack of chinook salmon.

Especially during difficult financial times, finding opportunities for economic benefit and job creation is important. Removing the Elwha dams provides a tremendous opportunity for creating "green jobs" and numerous other economic benefits.

Thank you for taking my comments into consideration.

From: Edward Hueneke

Comment: Dear Puget Sound Partnership,

I am writing to urge you to improve your action agenda's recommendations on pollution prevention. I want a healthy Puget Sound to be part of the legacy we leave our children.

Many Washington manufacturers continue to use harmful chemicals without any plans to switch to chemicals that are safer for Puget Sound. To protect public health and the environment, Washington's industry must begin phasing out of the worst toxic chemicals and developing plans to switch to safer alternatives.

Please include recommendations to help move Washington's businesses toward safer alternatives and away from chemicals known to be harmful to Puget Sound. These proposals should include

-Increasing the availability of technical assistance to help businesses reduce chemical use.

-Developing a state program to focus on researching safer chemicals and materials.

-Requiring better industry reporting to Ecology of the chemicals currently being used.

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From: Lura Irish

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From: Dean Jackson

Comment: We have recently moved from our beloved Puget Sound community of Magnolia to Ellensburg. Ellensburg and the entire Kittitas Valley along with the vistas to the Columbia River at Vantage and beyond are breathtaking. Some of the vistas are exactly like the views of the Grand Canyons. Prior to our move to Ellensburg (Kittitas Valley) we were caretakers of our beach areas at Discovery Park in Magnolia. How can we work toward and enlist efforts of others locally to ensure clean waterways for the fish for Puget Sound. I met Bill Ruckelshaus years ago via Archie Cox. Not sure if Bill would remember me now. Especially when I say "Bill." Regardless, please let me know what we must be doing here in Central Washington on behalf of the fish. Please pass this message along regarding "it's all about the fish."

From: Russell Jacobson

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For Puget Sound!

From: Gayle Janzen

Comment: Dear Puget Sound Partnership,

It is just horrible that we have lost 7 of our precious orcas this year probably due to lack of salmon. That speaks volumes to the degradation that has befallen their (our) ecosystem. While the draft Action Plan is a great step in the right direction, many are urging for even more important steps to be taken.

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PugetSoundPartnership
our sound, our economy, our community, our change

From: Karen Jeffers

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From: Edward Jennerich

Comment: Dear Paul:

The Washington Boating Alliance would like to commend the Puget Sound Partnership for its excellent work in identifying and attempting to come to grips with the enormity of this critical project. The magnitude of the problem and the potential solutions, both in terms of scope and costs, are overwhelming. Despite the impediments, we embrace the goal of a restored Puget Sound and agree it's important to move forward.

We believe the Action Agenda is an excellent first step. We do, however, recognize that there are still many unanswered questions regarding specific strategies to accomplish the objectives and unresolved financing mechanisms. We also would encourage the Partnership to continue to base its strategies on best scientific practices and to address those areas first that contribute most to the problems.

In closing, we'd like to commend the Partnership for recognizing the importance of the recreational boating community and the boating industry to the economic health and vitality of the region. Thank you for listening to and incorporating our perspectives in the Action Agenda and truly making this a partnership. We look forward to our continued involvement and to achieving a healthy, restored Puget Sound.

From: Dean Jenniges

Comment: When will this boondoogle and expenditures of millions of dollars to bring additional life to those bays with low tidal actions. The solution is simple if you understand the Puget Sound. The first thing is bays have mud bottoms. Life is precarious to say the least. What is needed are platforms and surfaces for life to develope on. The simple answer is use large rock and build deep water REEF's, REEF's,REEF's.

Not studies, studies and more studies. Then again if you solve the problem, you and yours would be without jobs.

I guess as long as you can fool the public keep doing it...

From: Diane Jensen

Comment: This is extremely important to our family. Puget Sound is a natural wonder and should be saved at all costs!

From: Craig Johnson

Comment: Dear Puget Sound Partnership,

This is a critical problem and we must take action now! The pollution is taking a heavy toll on our natural resources in the Puget Sound. Orcas, Western Grebes and so many other beautiful creatures are dying because of toxic pollutants.

I am sure companies will want to do the right thing, as their employees live in the Puget Sound. We can not pass this off on someone else to deal with.

From: Jennifer Johnson

Comment: The draft agenda looks very ambitious. I hope that you will help to fund local groups that have been conducting "in the field" researh for years and have unfunded programs that are ready to go. Please make it clear where the money that you request will be used. Is there a mechanism to apply for the funds from the partnership? Thanks!

From: Kirby Johnson

Comment: I am concerned about the health of Puget Sound and applaud the efforts of the partnership in creating the action agenda. It is obvious that a thremendous effort was involved to produce the plan in such a short period of time. The timeliness is very important and justifies any weaknesses that exist in the document. The great value of the partnership is that it provides a framework that encourages the state agencies involved to work together. Unfortunately the normal way the departments set priorities and obtain funding has not resulted in co operation

in the past. The great weakness of the partnership is that it has not made a place at the table for interested citizens. I have been a member of the Snohomish County Marine Resource Committee and the Northwest Straits Commission for the past nine years. Grass root citizen involvement has been a key element of the success of those groups. The partnership should make every effort to include citizens in the process. I find this recommendation often to be undervalued or dismissed, but it is very important. "We are all citizens" and "We did a survey" does not cut it, the ordinary unaffiliated citizen brings a perspective that the paid professional representing an organization does not have. To often the organizational representative is burdened with concerns about career, budget, funding, etc. that affect decisions. Find a way to include citizen driven representation. Congratulations on progress to date and godspeed on continued work. Thank you to all that participated for the action agenda.

From: Maile Johnson

Comment: Dear Puget Sound Partnership,

Thank you for your commitment to developing an Action Agenda for a healthy Puget Sound. From struggling orcas to toxic chemicals in our water, the Sound needs quick and decisive action today. I want to make sure we pass a thriving Puget Sound on to future generations.

I urge the Partnership to incorporate accountability, benchmarks of success, and ample funding into this Agenda.

The draft Action Agenda includes many of the essential elements that need to be accomplished, but in addition, the final Action Agenda must also:

-Amend the Cruise Ship MOU to ban all cruise ship discharges in Puget Sound;

-Prioritize the protection and restoration of the State's forage fish spawning beds;

-Complete the Management Plan for the Cherry Point Aquatic Reserve;

-Identify adequate and sustained funding for Plan implementation;

-Update the guidance for open water dredge disposal of PCBs;

-Expand the indicator species to include forage fish abundance and harbor seal toxics loading; and

-Accelerate the restoration of the Elwha River.

Thank you for your hard work to develop a draft Action Agenda to restore, protect and recover Puget Sound to health by 2020.

On behalf of everything from eelgrass to orcas.

From: Monica Johnson

Comment: Dear Puget Sound Partnership,

I am writing to urge you to improve your action agenda's recommendations on pollution prevention.

From: Nancy Johnson

Comment: Dear Puget Sound Partnership,

I am writing to urge you to improve your action agendas recommendations on pollution prevention.

From: Tressa Johnson

Comment: Dear Puget Sound Partnership,

Thank you for tackling the enormous challenge of saving Puget Sound head on. We appreciate your boldness and your efforts to engage the broader community, to listen to us and to base your decisions on science.

Surfrider Foundation is committed to supporting your efforts, primarily by encouraging people to get out in the watershed and into the Sound, to enjoy it, to appreciate it and to take action to protect and restore it. Through projects like Rise Above Plastics, beach clean ups and ocean friendly gardens, we will do our best to promote Sound stewardship practices.

In order to make sure that we reach our goal of a healthy Puget Sound by 2020, we ask that you strengthen the Action Agenda by incorporating the following recommendations:

- Be stronger on water quality measures by offering a comprehensive and robust program to prevent all sources of stormwater pollution and strengthening the list of actions for toxic pollution prevention.

- Develop different indicators for human well-being to include more opportunity for quality water-based recreation through increased shoreline access, clean beaches, and clean water.

- Be stronger on accountability by incorporating clear benchmarks to get us to a healthy Puget Sound by 2020.

- Create more opportunities and stronger protection programs to improve the public's interaction with the shoreline and achieve enough water quality improvement and habitat restoration to inspire the public to go to the water's edge more frequently.

- Ensure that there is enough funding for Puget Sound to achieve the goals laid out in this ambitious agenda.

Thank you for your hard work to develop a draft Action Agenda to restore, protect and

recover Puget Sound to health by 2020.

From: David Jones

Comment: Dear Puget Sound Partnership,

I am writing to urge you to improve your action agenda's recommendations on pollution prevention. I want a healthy Puget Sound to be part of the legacy we leave our children.

Many Washington manufacturers continue to use harmful chemicals without any plans to switch to chemicals that are safer for Puget Sound. To protect public health and the environment, Washington's industry must begin phasing out of the worst toxic chemicals and developing plans to switch to safer alternatives.

Please include recommendations to help move Washington's businesses toward safer alternatives and away from chemicals known to be harmful to Puget Sound. These proposals should include:

Increasing the availability of technical assistance to help businesses reduce chemical use.

Developing a state program to focus on researching safer chemicals and materials.

Requiring better industry reporting to Ecology of the chemicals currently being used.

From: David Jones

Comment: Dear Leadership Council,

Thank you for the opportunity to comment on the Puget Sound Partnership Draft Action Agenda. I appreciate the tremendous amount of work that has gone into developing it and I support the strong list of measures that, if implemented, will go a long way toward recovering Puget Sound by 2020.

The draft plan includes a few omissions. The final plan should include Outstanding Resource Water (ORW) designation under the Clean Water Act as a tool to help protect rivers and other aquatic habitat. While I strongly support the inclusion of Wild and Scenic designation as a similar tool, in some cases ORW designation will likely prove to be a better, more immediate way for the state to ensure the protection of high quality rivers and other waters. Therefore, I urge the Partnership to include support for the Outstanding Resource Water designation as one of its "Near Term Actions." ORW designations permanently protect high quality waters that are ecologically significant, provide cold water refuges for fish, and/or support important recreational values. Many rivers in the Puget Sound region are eligible for ORW designation. I would also like to encourage you to include funds to move up the removal of the two dams on the Elwha from 2012 to 2010. Removal of the Elwha dams is one of the best chances for salmon and steelhead recovery in the region as it will open up over 70 miles of prime spawning habitat. Removing these dams has also been as a key action to recover our Puget Sound's orca population, which is malnourished thanks to a lack

of chinook salmon.

Especially during difficult financial times, finding opportunities for economic benefit and job creation is important. Removing the Elwha dams provides a tremendous opportunity for creating "green jobs" and numerous other economic benefits.

Thank you for taking my comments into consideration.

From: Jamie N. Jones

Comment: Dear Puget Sound Partnership,

I am writing to urge you to improve your action agendas recommendations on pollution prevention. Please include more provisions to reduce the contribution of harmful chemicals from Washington businesses. Please consider:

-increasing the availability of technical assistance to help businesses reduce chemical use

-developing a state program to focus on researching safer chemicals and materials, and

-requiring better industry reporting of the chemicals currently being used.

From: Robert Jones

Comment: Dear Puget Sound Partnership,

Thank you for your hard work to develop a draft Action Agenda to restore, protect and recover Puget Sound to health by 2020. It could not come at a more pressing time, especially for the Sound's iconic and endangered orca whale. Just this month, researchers reported seven orcas "10% of the Puget Sound population" are missing and believed to be dead. Some experts say dwindling populations of endangered Chinook salmon are at least partly to blame. Is this a sign that our ecosystem is on the verge of collapsing?

The urgency of restoring the Sound to health is at a tipping point and missing orcas are the Sound's "canaries in the coal mine," telling us we are running out of time. But there is hope for the orca, as there was hope for the bald eagle, the California Condor and others on the verge of extinction. The Puget Sound Partnership's Action Agenda is a golden opportunity to do what has not been done for over 20 years- develop and implement a recovery plan that is accountable, effective, transparent and decisive with sustained funding to restore this national treasure to health by 2020.

The draft Action Agenda includes many of the essential elements that need to be done:

-Require low-impact development to reduce stormwater pollution;

-Prohibit new bulkheads near feeder bluffs and forage fish spawning beaches;

-Fund local governments to develop and carry out shoreline master programs;

-Fund enforcement staff at state agencies and local governments;

-Implement specific, aggressive cleanup plans for polluted waters, including TMDLs;

-Fully fund a permanent year-round rescue tug at Neah Bay for oil spill prevention;

-Acquire critical intact parcels for habitat protection and conservation;

-Set strong requirements for water quantity, such as setting in-stream flow for all major rivers.

BUT, more than a list of Soundwide and Action Area-specific actions, the Partnership must create a real 2020 Action Agenda, not just a 2-year plan, that clearly identifies the specific actions that are needed over the next 12 years and the HOW and WHO and BY WHEN each action must be completed. All the actions need to be tied together into a comprehensive plan with measurable benchmarks and timelines in order to achieve recovery by 2020. The final Action Agenda must:

-Clearly identify timelines and responsibilities;

-Identify adequate and sustained funding for the long haul;

-Be a visionary and long term plan;

-Be based on science;

-Offer a comprehensive and robust program to prevent all sources of stormwater pollution, not just municipal stormwater;

-Strengthen the list of actions for toxic pollution prevention;

-Set meaningful standards for habitat protection;

-Balance regulatory change with land acquisition to accomplish long term recovery goals;

-Expand the indicator species to include more than just salmon, i.e. forage fish, harbor seals, etc.

The Partnership staff, the Leadership Council, Ecosystem Coordinating Board, Science Panel and stakeholders throughout the Sound deserve praise for the monumental effort involved in producing the draft Action Agenda. The next step is secure much needed funding. The 2009 legislature must adopt new funding sources dedicated to the recovery of Puget Sound by 2020.

For Puget Sound!

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From: Kathy Jubitz

Comment: Dear Puget Sound Partnership,

I am writing to urge you to improve your action agenda's recommendations on pollution prevention. I want a healthy Puget Sound to be part of the legacy we leave our children.

Many Washington manufacturers continue to use harmful chemicals without any plans to switch to chemicals that are safer for Puget Sound. To protect public health and the environment, Washington's industry must begin phasing out of the worst toxic chemicals and developing plans to switch to safer alternatives.

Please include recommendations to help move Washington's businesses toward safer alternatives and away from chemicals known to be harmful to Puget Sound. These proposals should include:

Increasing the availability of technical assistance to help businesses reduce chemical use.

Developing a state program to focus on researching safer chemicals and materials.

Requiring better industry reporting to Ecology of the chemicals currently being used.

From: Barbara Jurgens

Comment: Dear Puget Sound Partnership,

I am writing to urge you to improve your action agendas recommendations on pollution prevention.

From: Arden Kagetsu

Comment: Dear Puget Sound Partnership,

I am writing to urge you to improve your action agendas recommendations on pollution prevention.

From: Cathy Kail

Comment: Dear Puget Sound Partnership,

I am writing to urge you to improve your action agendas recommendations on pollution prevention. The current draft of the action plan does not include provisions that will help move Washington's businesses toward safer alternatives and away from chemicals known to be harmful.

These proposals should include increasing the availability of technical assistance to help businesses understand how to reduce chemical use and implement those processes,

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developing a state program to focus on researching safer chemicals and materials, and requiring better industry reporting of the chemicals currently being used.

Our lives and the lives of the animals with whom we share this planet depend upon clean soil, air, and water. Please do all you can to ensure better stewardship.

From: Blair Kangley

Comment: Dear Puget Sound Partnership,

Thank you for your commitment to developing an Action Agenda for a healthy Puget Sound. From struggling orcas to toxic chemicals in our water, the Sound needs quick and decisive action today. I want to make sure we pass a thriving Puget Sound on to future generations.

I urge the Partnership to incorporate accountability, benchmarks of success, and ample funding into this Agenda.

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-Accelerate the restoration of the Elwha River.

Thank you for your hard work to develop a draft Action Agenda to restore, protect and recover Puget Sound to health by 2020.

On behalf of everything from eelgrass to orcas.

From: Jason Kapchinske

Comment: Dear Leadership Council,

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The draft plan includes a few omissions. The final plan should include Outstanding Resource Water (ORW) designation under the Clean Water Act as a tool to help protect rivers and other aquatic habitat. While I strongly support the inclusion of Wild and Scenic designation as a similar tool, in some cases ORW designation will likely prove to be a better, more immediate way for the state to ensure the protection of high quality rivers and other waters.

Therefore, I urge the Partnership to include support for the Outstanding Resource Water designation as one of its "Near Term Actions." ORW designations permanently protect high quality waters that are ecologically significant, provide cold water refuges for fish, and/or support important recreational values. Many rivers in the Puget Sound region are eligible for ORW designation.

I would also like to encourage you to include funds to move up the removal of the two dams on the Elwha from 2012 to 2010. Removal of the Elwha dams is one of the best chances for salmon and steelhead recovery in the region as it will open up over 70 miles of prime spawning habitat. Removing these dams has also been as a key action to recover our Puget Sound's orca population, which is malnourished thanks to a lack of chinook salmon.

Especially during difficult financial times, finding opportunities for economic benefit and job creation is important. Removing the Elwha dams provides a tremendous opportunity for creating "green jobs" and numerous other economic benefits.

Thank you for taking my comments into consideration.

From: Margaret Kaperick

Comment: Dear Puget Sound Partnership,

The Partnership staff, the Leadership Council, Ecosystem Coordinating Board, Science Panel and stakeholders throughout the Sound deserve praise for the monumental effort involved in producing the draft Action Agenda. The next step is to finalize a plan that is accountable, transparent, effective and have dedicated new funding sources to the recovery of Puget Sound by 2020.

The Partnership must create a real 2020 Action Agenda, not just a 2-year plan that clearly identifies the specific actions that are needed over the next 12 years and the HOW and WHO and BY WHEN each action must be completed. All the actions need to be tied together into a comprehensive whole through measurable benchmarks that must be accomplished in order to achieve recovery by 2020.

Thank you for this opportunity to strengthen a strategy to save Puget Sound.

From: Robert Kaplan

Comment: Dear Puget Sound Partnership,

Thank you for your hard work to develop a draft Action Agenda to restore, protect and recover Puget Sound to health by 2020. It could not come at a more pressing time, especially for the Sound's iconic and endangered orca whale. Just this month, researchers reported seven orcas "10% of the Puget Sound population" are missing and believed to be dead. Some experts say dwindling populations of endangered Chinook salmon are at least partly to blame. Is this a sign that our ecosystem is on the verge of collapsing?

The urgency of restoring the Sound to health is at a tipping point and missing orcas are the Sound's "canaries in the coal mine," telling us we are running out of time. But there is hope for the orca, as there was hope for the bald eagle, the California Condor and others on the verge of extinction. The Puget Sound Partnership's Action Agenda is a golden opportunity to do what has not been done for over 20 years- develop and implement a recovery plan that is accountable, effective, transparent and decisive with sustained funding to restore this national treasure to health by 2020.

The draft Action Agenda includes many of the essential elements that need to be done:

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For Puget Sound!

From: Cameron Karsten

Comment: Dear Leadership Council,

Thank you for the opportunity to comment on the Puget Sound Partnership Draft Action Agenda. I appreciate the tremendous amount of work that has gone into developing it and I support the strong list of measures that, if implemented, will go a long way toward recovering Puget Sound by 2020.

The draft plan includes a few omissions. The final plan should include Outstanding Resource Water (ORW) designation under the Clean Water Act as a tool to help protect rivers and other aquatic habitat. While I strongly support the inclusion of Wild and Scenic designation as a similar tool, in some cases ORW designation will likely prove to be a better, more immediate way for the state to ensure the protection of high quality rivers and other waters. Therefore, I urge the Partnership to include support for the Outstanding Resource Water designation as one of its "Near Term Actions." ORW designations permanently protect high quality waters that are ecologically significant, provide cold water refuges for fish, and/or support important recreational values. Many rivers in the Puget Sound region are eligible for ORW designation. I would also like to encourage you to include funds to move up the removal of the two dams on the Elwha from 2012 to 2010. Removal of the Elwha dams is one of the best chances for salmon and steelhead recovery in the region as it will open up over 70 miles of prime spawning habitat. Removing these dams has also been as a key action to recover our Puget Sound's orca population, which is malnourished thanks to a lack of chinook salmon.

Especially during difficult financial times, finding opportunities for economic benefit and job creation is important. Removing the Elwha dams provides a tremendous opportunity for

creating "green jobs" and numerous other economic benefits.

Thank you for taking my comments into consideration.

From: Laura Keehan

Comment: A couple more comments from the City of Olympia:

1. (Page 25 C.4.1.1) Suggest regulations initiated with 3SHB 1458 (2006) be tightened to further define "marine recovery areas". Currently, there is significant leeway given to the local health officer. Impacted stream reaches discharging to the marine area should be required to be included in the marine recovery areas. Similarly, minimum inspection and maintenance requirements should be outlined by the State rather than the local health jurisdiction.

2. (Page 25 C.4.3) I strongly encourage the State to develop uniform basin-wide cost-share and loan programs for homeowners. Programs could be administered locally. In my experience, other than education, a lack of financial ability is the primary obstacle to proper septic system maintenance and repair.

From: Marcus Keeney

Comment: Dear Puget Sound Partnership,

The Partnership staff, the Leadership Council, Ecosystem Coordinating Board, Science Panel and stakeholders throughout the Sound deserve praise for the monumental effort involved in producing the draft Action Agenda. The next step is to finalize a plan that is accountable, transparent, effective and have dedicated new funding sources to the recovery of Puget Sound by 2020.

The Partnership must create a real 2020 Action Agenda, not just a 2-year plan that clearly identifies the specific actions that are needed over the next 12 years and the HOW and WHO and BY WHEN each action must be completed. All the actions need to be tied together into a comprehensive whole through measurable benchmarks that must be accomplished in order to achieve recovery by 2020.

Thank you for this opportunity to strengthen a strategy to save Puget Sound.

PugetSoundPartnership
Our Sound. Our commitment. Our chance.

Maxine Keesling
15241 NE 153rd Street
Woodinville, WA 98072
(425) 483-8523

November 20, 2008

TO: Puget Sound Partnership (fax: 1-360-725-5456)

RE: Transmission of comments on DRAFT 2020 ACTION AGENDA

Herewith are 3 pages of comments/attachments on the above.

Unfortunately, due to the remarkably short time period - 14 days - in which to soak up an intensive, detailed document, I got only about a third of the way through.

Sincerely,

Maxine Keesling

PugetSoundPartnership
our sound, our community, our chance

Maxine Keesling
15241 NE 153rd Street
Woodinville, WA 98072
(425) 483-8523

Comment on

PUGET SOUND PARTNERSHIP DRAFT 2020 ACTION AGENDA FOR PUGET SOUND

OBJECTION TO NOTICE TIMING AND FORMAT

FIRST: As a listed attendee testifying at the April 10 '07 House committee meeting on ESSB 5372 - creating the Puget Sound Partnership (PSP) - I should have received notice of the November 6 '08 release of the DRAFT 2020 Action Agenda for Puget Sound. Instead I had to call the PSP for a copy on November 7th after reading an article in the Seattle Times. (I do not do computers.) Copied at the end of this Comment paper is a copy of a letter by me published in the Capital Press, an Oregon paper devoted to agricultural news. That letter indicates an early and ongoing interest in the PSP.

SECOND: For ease of reference each page of the DRAFT should have been numbered 1 through 95 instead of "Question 2/Page 1", "Question 3/Page 27" etc.

THIRD: The requirement that public comment on the voluminous DRAFT be received only until November 20 - 14 days from publication - is a ridiculous timeline for members of the public with other commitments.

. . . . . .

MY COMMENTS

RCW 90.71.360 states that the PSP shall not have regulatory authority and that the action agenda can't adopt plans or regulations.

RCW 90.71.350 provides that the PSP council or an implementing entity shall review conflicts and impediments to implementing the action agenda and make recommendations to the legislature, governor, etc. for resolving the problems.

Because the DRAFT is rife with calls for new rules and regulations, the DRAFT Introduction must include a strong, unequivocal statement that any reference to new rules or regulations means or implies only a RECOMMENDATION to the legislature to adopt such rules or regulations.

QUESTIONABLE AGENDA ITEMS

a. "Immediate risk of conversion": On several pages up to and including the A.4 Actions there is discussion of protecting/acquiring lands at immediate risk of conversion. What, exactly, does that mean? It appears to mean that rural land about to be used at densities adopted in compliance with the Growth Management Act that have unblemished native growth should be swept out of use to preserve intact nature. For private property owners, that philosophy is an abomination.

b. "Watershed scale - WRIAs": While watershed characterizations are used as far as I've gone in the DRAFT, WRIAs are particularly mentioned in A.1.3.2. WRIA 8 includes the Sammamish River for which there is a 1960s Congressional document which among other things forbade planting trees on the river banks because they uproot and fall into the river. The Army Corps of Engineers recently forced King County to remove trees from the Green River for the same reason. The PSP must not ignore immutable facts.

c. Trees/Reforestation/Levees: Question 1/Page 3, Question 2/Page 6, Question 3/Page 9, Question 3/Page 16, Question 3/Page 34, etc. are essentially focused on back-to-naturing what man has done to promote the economic and social wellbeing of man. In King County, the most populous of Washington counties, 61% of the land is owned by a government entity or protected through land trusts or conservation easements. On top of that is the county's Critical Areas Ordinance which requires preservation of large areas of private land. The PSP appears to be operating in a vacuum, forgetting there is already in place a massive amount of land use regulation affecting private property rights.

d. No-net-loss: Question 3/Page 10 and Question 3/Page 34 refer to "no-net-loss of ecological function as required by the Shoreline Management Act . . ." The latest 2008 edition of RCW 90.58, SHORELINE MANAGEMENT ACT OF 1971, does not contain anything about no-net-loss. PSP's wishful thinking does not translate into existing law.

e. Bulkheads/shoreline hardening: Question 3/Page 10 and Question 3/Page 16 call for conditional use permits for not just new shoreline hardening but also for repair of same. Removal of "shoreline armoring" is recommended. The PSP should highlight and underscore this huge change that would erase existing protection from erosion of beaches in front of homes.

Due to time constraints and other commitments, especially the fact that today is the deadline for comments, I have been able to read only through Question 3/Page 34. However, having noted the November 7th Times article's comment on the Agenda's lack of dollar figures, I did turn to the end-of-report Financing chapter:

f. Funding: The Financing chapter devotes itself to a detailed description of the dollar amounts of back-to-naturing. But the only hard figure for costs-to-cure was "between $200 million and $300 million" for 2008-2011, not including the cost of existing programs already being implemented. Inasmuch as detailed hard figures for Water Resource Inventory Areas (WRIA) projects were done earlier, the PSP should be able to provide an estimate of its project costs.

Maxine Keesling
Maxine Keesling
November 20, 2008

ATTACHMENTS:

(1) CAPITAL PRESS letter, 2-9-07

(2) VALLEY DAILY NEWS, 1991 article w/picture

ATT. 1

(AG. WEEKLY IN SALEM OREGON)

CAP. PRESS 2-9-05

Oppose regional watershed rule

I, for one, don't want to be tossed under the astronomically expensive regulations, up to $18 billion in new expenditures between now and 2020 according to a Jan. 14 Seattle Post-Intelligencer article, of a regional governance entity controlled by the dictates of what's best for fish.

But that's exactly what I and others within the boundaries of Water Resource Inventory Areas 1 through 19 are scheduled for under the Puget Sound partnership legislation found in House Bill 1374 currently under consideration in at least three separate House committees in Olympia.

It's not only the saltwater areas, plus their uplands, that come under this new all-powerful, seven-member leadership council appointed by the governor, but also all the freshwater rivers and streams and their uplands that lose their local control and fall under this new regional governance.

ATTACHMENT (1)

The partnership's leadership council, after creating regulations for preservation and restoration of the natural ecosystem functions, then determines "compliance (by local governments) with the action agenda and achievement of the results expected."

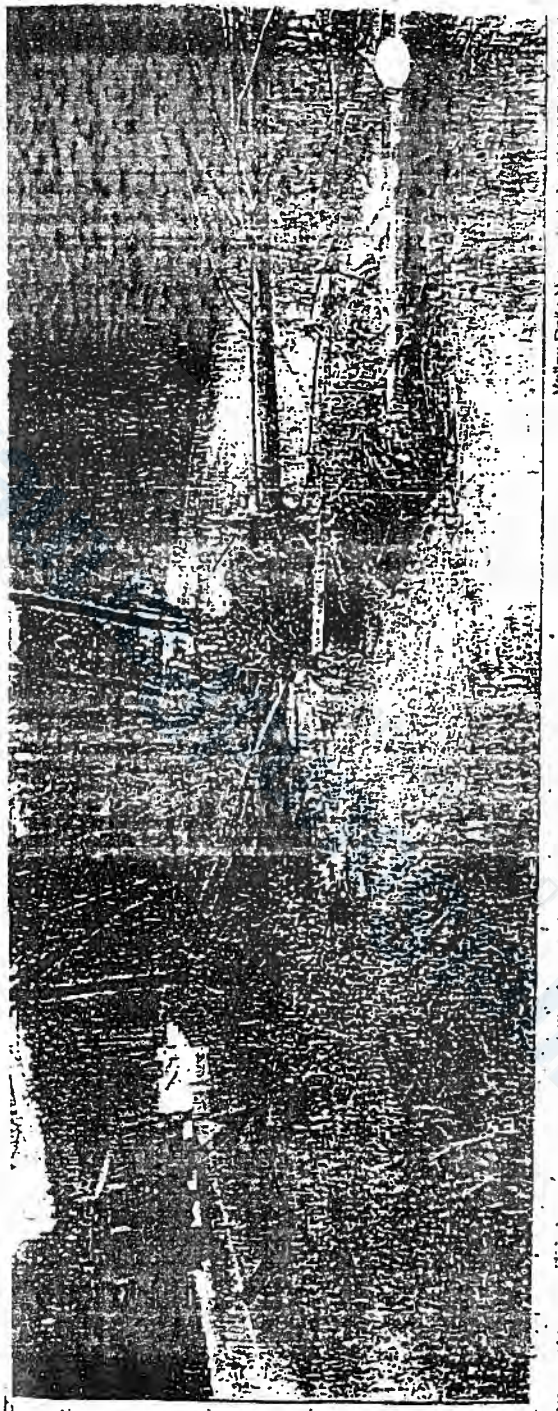
Given that the leadership council also serves as the regional recovery organization for Puget Sound salmon recovery, what are the odds that this partnership council, appointed by an environmentalist governor formerly the head of the Department of Ecology, will enact maximum critical area buffers hundreds of feet wide along with connecting corridors a la King County's critical areas ordinance?

Call your legislators and whatever groups you belong to, i.e. Farm Bureau, the Grange, Rotary, etc., to lobby against and kill House Bill 1374. We already have protective new statewide stormwater runoff regulations and strong shoreline management and growth management rules that at least ostensibly leave control with local government. We neither need, nor want, regional governance.

Maxine Keesling
Woodinville, Wash.

ATT. 2

ATTACHMENT (2)



An Auburn School District bus travels near the Soos Creek slide area. Valley Daily News file photo by DUANE HAMAMURA

APRIL 6, 1991

Auburn-area road crumbling; engineers scratch their heads

By BRUCE HOMMEL
Valley Daily News

AUBURN – Soils engineers are trying to learn why sections of Auburn-Black Diamond Road are sinking, leaving depressions in the roadway and cracks and crumbling where the asphalt paving is separating.

The road has been examined and is safe to drive, a King County public works official said Thursday, and the road is being monitored on a daily basis.

County road crews also are getting ready for repair work on another nearby section of Auburn-Black Diamond Road near the state's Green River Fish Hatchery.

Trees that fell into Soos Creek are slowing water now (wash)

ing uway on earthen embankment near the road's shoulder, said Henry Kuga, a special operations superintendent for the King County roads maintenance division.

The work won't be as simple as merely removing the fallen trees from the protected salmon spawning creek.

The state wants the trees to stay in the creek, Kuga said. It's good for the fish, they say. It provides them cover.

County crews were to be working at the site beginning today or early next week. Repairing and reinforcing the embankment will sometimes require closure of one lane of traffic on two-lane Auburn-Black Diamond Road. Drivers should be prepared for some delays.

Flaggers will be on the site directing traffic, Kuga said. → AND SNOW

Work to repair the sinking sections of the road a short distance to the east won't begin until it's determined why the roadway is sinking. Some days the surface drops a quarter- or half-inch under the weight of passing vehicles, Kuga said.

The three problem sections of roadway are between 148th and 161st avenue southeast. Auburn School District buses were re-routed around that stretch of roadway for several days until county engineers examined the roadway and determined it was safe to use.

The sections started sinking hot last after heavy rains earlier this month. Kuga said he can't speculate on what might be causing the roadway to sink until soil drilling and testing and other examinations are completed.

From: Marcie Keever

Comment: Dear Puget Sound Partnership,

Thank you for your commitment to developing an Action Agenda for a healthy Puget Sound. From struggling orcas to toxic chemicals in our water, the Sound needs quick and decisive action today. I want to make sure we pass a thriving Puget Sound on to future generations.

I urge the Partnership to incorporate accountability, benchmarks of success, and ample funding into this Agenda.

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-Complete the Management Plan for the Cherry Point Aquatic Reserve;

-Identify adequate and sustained funding for Plan implementation;

-Update the guidance for open water dredge disposal of PCBs;

-Expand the indicator species to include forage fish abundance and harbor seal toxics loading; and

-Accelerate the restoration of the Elwha River.

Thank you for your hard work to develop a draft Action Agenda to restore, protect and recover Puget Sound to health by 2020.

On behalf of everything from eelgrass to orcas.

From: Jourdan Keith

Comment: Grassroots public education is required. Information in multiple languages--Seattle Public Library can help. Incorporate info in libraries and schools with action steps.

MUCH MORE attention is needed to human health impacts for public change. make the connections. Include Washignton Toxics Coalition and Urban Wilderness Project in your efforts. Please focus on the info about about CSO's. Educate people about how changing home habits can help reduce waste water treatment systems from being taxed, ESPECIALLY in the fal land rainy season--yes, connect it to Salmon. Example--people flushing and the amount of waste water that will need to be treateed especailly as popluation grows, but also RIGHT NOW.

Urban Wilderness Project advocates using different language to help people understand

what can not simply be undone, so that they STOP damaging now! How can citizens get involved in creating policy? I have so much more that I wish to share. I think we must make rapid and radical behaviour changes...like swerving to avoid a collision.

From: Jessica Kenney

Comment: Dear Puget Sound Partnership,

I am writing to urge you to improve your action agendas recommendations on pollution prevention.

From: Robert and Julia Kenny-Glover

Comment: Dear Puget Sound Partnership,

We are writing to urge you to improve your action agendas recommendations on pollution prevention.

From: Erica Kerwien

Comment: Dear Puget Sound Partnership,

I am writing to urge you to improve your action agenda's recommendations on pollution prevention.

From: Jamal Khan

Comment: My comment pertains primarily to the financial reality of this Agenda. I've read that the Puget Sound Partnership (PSP) has received an $8 billion budget to fix the Puget Sound by 2020, and was given a "down payment" of $238 million dollars for the first two years of this program. It has additionally received $20 million from the federal level. In these first two years, we have thus far only seen a plan of fixing the Sound.

The PSP has a beautiful website with numerous downloadable reports on -the state of the sound— and Partnership News consists of a list of more than 30 meetings that took place over the past two years but there is no summary of actual restoration or success in preservation. Without any visible evidence of the progress made, people tend to lose hope in the Agenda and so also lose hope in the PSP.

It is very important to have the community engaged through not only educational outreach programs but also by providing them with examples of success. Since it is the tax payer's dollar that is going towards the PSP budget, their approval of your Agenda should be the utmost priority.

Secondly, the Partnership was, well, lucky enough to receive the $238 million at the time

they did because such an amount is not possible under the current economic conditions. Two years ago, our economy was thriving, giving us the false idea that it will always be like this. In the past 13 months, the market has dropped in value to about half. The state budget deficit that was at first predicted to be at $3.2 billion, an outrageous enough amount itself, is now found to be over $5 billion. The state and federal budgets are cutting spending across the board and programs that do not have a direct impact on the population are the first to go. The Action Agenda estimates that the total cost for the next biennium is somewhere from $200 to $300 million. Under such economic pressure, it is unrealistic for us to believe that the budget provided will be even close to this amount. For this Agenda to succeed, it has to be realistic or it's going to end like the Willamette Alternative Futures analysis, with nothing actually done but a lot studied.

Finally, I think that the Agenda should be a lot more precise. Without any numbers, figures, or graphs, the Agenda just seems like a hopeful dream not a doctrine to be followed. As cited above, this plan should not fail like the Willamette and Chico Creek Alternative Futures, regardless of the economic crisis we face. The repercussions of a failure might result in no more funding for such programs. This is too important of a project.

In summary, the Action Agenda should be updated with the current financial situation in mind, for a more realistic picture that precisely describes what action is to be taken. With an updated picture of the Sound, we can make viable decisions that can actually be carried out.

From: Carol Kibble

Comment: Dear Puget Sound Partnership,

Thank you for your hard work to develop a draft Action Agenda to restore, protect and recover Puget Sound to health by 2020. It could not come at a more pressing time, especially for the Sound's iconic and endangered orca whale. Just this month, researchers reported seven orcas "10% of the Puget Sound population" are missing and believed to be dead. Some experts say dwindling populations of endangered Chinook salmon are at least partly to blame. Is this a sign that our ecosystem is on the verge of collapsing?

The urgency of restoring the Sound to health is at a tipping point and missing orcas are the Sound's "canaries in the coal mine," telling us we are running out of time. But there is hope for the orca, as there was hope for the bald eagle, the California Condor and others on the verge of extinction. The Puget Sound Partnership's Action Agenda is a golden opportunity to do what has not been done for over 20 years- develop and implement a recovery plan that is accountable, effective, transparent and decisive with sustained funding to restore this national treasure to health by 2020.

The draft Action Agenda includes many of the essential elements that need to be done:

-Require low-impact development to reduce stormwater pollution;

-Prohibit new bulkheads near feeder bluffs and forage fish spawning beaches;

-Fund local governments to develop and carry out shoreline master programs;

-Fund enforcement staff at state agencies and local governments;

-Implement specific, aggressive cleanup plans for polluted waters, including TMDLs;

-Fully fund a permanent year-round rescue tug at Neah Bay for oil spill prevention;

-Acquire critical intact parcels for habitat protection and conservation;

-Set strong requirements for water quantity, such as setting in-stream flow for all major rivers.

BUT, more than a list of Soundwide and Action Area-specific actions, the Partnership must create a real 2020 Action Agenda, not just a 2-year plan, that clearly identifies the specific actions that are needed over the next 12 years and the HOW and WHO and BY WHEN each action must be completed. All the actions need to be tied together into a comprehensive plan with measurable benchmarks and timelines in order to achieve recovery by 2020. The final Action Agenda must:

-Clearly identify timelines and responsibilities;

-Identify adequate and sustained funding for the long haul;

-Be a visionary and long term plan;

-Be based on science;

-Offer a comprehensive and robust program to prevent all sources of stormwater pollution, not just municipal stormwater;

-Strengthen the list of actions for toxic pollution prevention;

-Set meaningful standards for habitat protection;

-Balance regulatory change with land acquisition to accomplish long term recovery goals;

-Expand the indicator species to include more than just salmon, i.e. forage fish, harbor seals, etc.

The Partnership staff, the Leadership Council, Ecosystem Coordinating Board, Science Panel and stakeholders throughout the Sound deserve praise for the monumental effort involved in producing the draft Action Agenda. The next step is secure much needed funding. The 2009 legislature must adopt new funding sources dedicated to the recovery of Puget Sound by 2020.

For Puget Sound!

PugetSoundPartnership
Our Sound, our community, our chance

From: Caryolyn Kinch

Comment: supporting actions to protect and restore puget sound is exactly the sort of direction we should have been taking from arrival to the area as a non indigenous species ourselves....how dare we continue to ignore the impact of thinking ourselves separate and somehow superior to the rest of the natural universe???

From: Carolyn Kine

Comment: Dear Puget Sound Partnership,

Anything we can do to save our natural environment, and all the creatures in it, is the right thing to do. I just read an article about the thick, brown clouds of pollution hanging over Beijing, China that are killing hundreds of thousands of people each year due to pollution-related illnesses. Let's do everything we can to protect and save our beloved Puget Sound, for without the beauty of the natural environment to nourish our souls, we would die a spiritual death (not to mention an untimely physical death)!

Thank you for your hard work to develop a draft Action Agenda to restore, protect and recover Puget Sound to health by 2020. It could not come at a more pressing time, especially for the Sound's iconic and endangered orca whale. Just this month, researchers reported seven orcas "10% of the Puget Sound population" are missing and believed to be dead. Some experts say dwindling populations of endangered Chinook salmon are at least partly to blame. Is this a sign that our ecosystem is on the verge of collapsing?

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For Puget Sound!

From: Carolyn King

Comment: Dear Puget Sound Partnership,

Thank you for your commitment to developing an Action Agenda for a healthy Puget Sound. From struggling orcas to toxic chemicals in our water, the Sound needs quick and decisive action today. I want to make sure we pass a thriving Puget Sound on to future generations.

I urge the Partnership to incorporate accountability, benchmarks of success, and ample funding into this Agenda.

The draft Action Agenda includes many of the essential elements that need to be

accomplished, but in addition, the final Action Agenda must also:

-Amend the Cruise Ship MOU to ban all cruise ship discharges in Puget Sound;

-Prioritize the protection and restoration of the State's forage fish spawning beds;

-Complete the Management Plan for the Cherry Point Aquatic Reserve;

-Identify adequate and sustained funding for Plan implementation;

-Update the guidance for open water dredge disposal of PCBs;

-Expand the indicator species to include forage fish abundance and harbor seal toxics loading; and

-Accelerate the restoration of the Elwha River.

Thank you for your hard work to develop a draft Action Agenda to restore, protect and recover Puget Sound to health by 2020.

On behalf of everything from eelgrass to orcas.

From: Kas Kinkead

Comment: I am deeply disappointed that there is not more emphasis on the known successes of Low Impact Development(bioretention, compost amended soils, etc)in our region. There is an enormous amount of research showing the effectiveness of this strategy, it has been shown to save money - (see the enthusiastic embrace of LID by the Kitsap Homebuilder's assoc); we know how to do it (see Seattle's new stormwater manual; EPA's green infrastructure web resources; LID center in MD; PSAT's LID manual); and it is being implemented in the Puget Sound and across the nation with much success. The Partnership's effort is commendable, yet still feels like a re-hash of what we already know. Politically I understand the importance of getting everyone to the table. But, there is also great political capital to be gained by pointing to and fully supporting those practices that are being done that have remarkable and measurable results - LID is one of those. There is so much evidence that points to reductions from 60-90% annual stormwater reductions along with astounding pollutant removal rates resulting from LID applications. Why do we wait? I liken this to the approach the pharmaceuticals take when studying new drug impacts - when something shows statistically significant benefits it is morally necessary to immediately switch study subjects to the beneficial drug.

From: Richard Kirchhoff

Comment: Dear Leadership Council,

Thank you for the opportunity to comment on the Puget Sound Partnership Draft Action Agenda. I appreciate the tremendous amount of work that has gone into developing it and I support the strong list of measures that, if implemented, will go a long way toward recovering Puget Sound by 2020.

The draft plan includes a few omissions. The final plan should include Outstanding Resource Water (ORW) designation under the Clean Water Act as a tool to help protect rivers and other aquatic habitat. While I strongly support the inclusion of Wild and Scenic designation as a similar tool, in some cases ORW designation will likely prove to be a better, more immediate way for the state to ensure the protection of high quality rivers and other waters. Therefore, I urge the Partnership to include support for the Outstanding Resource Water designation as one of its "Near Term Actions." ORW designations permanently protect high quality waters that are ecologically significant, provide cold water refuges for fish, and/or support important recreational values. Many rivers in the Puget Sound region are eligible for ORW designation. I would also like to encourage you to include funds to move up the removal of the two dams on the Elwha from 2012 to 2010. Removal of the Elwha dams is one of the best chances for salmon and steelhead recovery in the region as it will open up over 70 miles of prime spawning habitat. Removing these dams has also been as a key action to recover our Puget Sound's orca population, which is malnourished thanks to a lack of chinook salmon.

Especially during difficult financial times, finding opportunities for economic benefit and job creation is important. Removing the Elwha dams provides a tremendous opportunity for creating "green jobs" and numerous other economic benefits.

Thank you for taking my comments into consideration.

From: Harry Kirchner

Comment: Dear Puget Sound Partnership,

The Partnership staff, the Leadership Council, Ecosystem Coordinating Board, Science Panel and stakeholders throughout the Sound deserve praise for the monumental effort involved in producing the draft Action Agenda. The next step is to finalize a plan that is accountable, transparent, effective and have dedicated new funding sources to the recovery of Puget Sound by 2020.

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From: Mike Kirsch

Comment: Dear Puget Sound Partnership,

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Thank you for this opportunity to strengthen a strategy to save Puget Sound.

From: Mary Ann Kirsling

Comment: Dear Puget Sound Partnership,

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On behalf of everything from eelgrass to orcas.

From: Amy Kitchener

Comment: Dear Puget Sound Partnership,

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Thank you for this opportunity to strengthen a strategy to save Puget Sound.

From: Zachary Klaja

Comment: Dear Puget Sound Partnership,

Thank you for tackling the enormous challenge of saving Puget Sound head on. We appreciate your boldness and your efforts to engage the broader community, to listen to us and to base your decisions on science.

Surfrider Foundation is committed to supporting your efforts, primarily by encouraging people to get out in the watershed and into the Sound, to enjoy it, to appreciate it and to take action to protect and restore it. Through projects like Rise Above Plastics, beach clean ups and ocean friendly gardens, we will do our best to promote Sound stewardship practices.

In order to make sure that we reach our goal of a healthy Puget Sound by 2020, we ask that you strengthen the Action Agenda by incorporating the following recommendations:

- Be stronger on water quality measures by offering a comprehensive and robust program to prevent all sources of stormwater pollution and strengthening the list of actions for toxic pollution prevention.

- Develop different indicators for human well-being to include more opportunity for quality water-based recreation through increased shoreline access, clean beaches, and clean water.

- Be stronger on accountability by incorporating clear benchmarks to get us to a healthy Puget Sound by 2020.

- Create more opportunities and stronger protection programs to improve the public's interaction with the shoreline and achieve enough water quality improvement and habitat

restoration to inspire the public to go to the water's edge more frequently.

- Ensure that there is enough funding for Puget Sound to achieve the goals laid out in this ambitious agenda.

Thank you for your hard work to develop a draft Action Agenda to restore, protect and recover Puget Sound to health by 2020.

From: Jesse Knight

Comment: I am a lifelong WA resident, formerly of Olympia, currently in Spokane, but moving back the westside next year long term. This topic is near and dear to my heart, and I am encouraged that the State is taking a serious look at what kind of commitments and sacrifices are needed to restore the Sound. My comments are:

1. Growth. Are our current GMAs strong enough to provide ecosystem protection? How can we make sure new development is not happening in prime habitat (and also in prime farmland- humans need to eat too). It does not seem that the current GMAs that I have some familiarity with (Thurston and Clallam counties) really provide significant teeth or incentive to steer growth. Consider the almost wall to wall development of the Sequim area, covering prime farmland with suburban development, etc. Also, we should strongly consider the compensation package that will be needed to remove development rights from private property/ buy private property. This is going to take a TON of money to have an effect- and don't get me wrong, it is worth it- but we need to figure out where the funding for habitat preservation will come from. Ideas include a hefty tax/ fee on new development, a users fee if you will, for the privilege of developing in this amazing location.

2. Stormwater. Need teeth to provide incentive to change current management. Development fees?

3. Consider charging well users a water harvesting fee. My parents are on a well in Olympia, and I discussed this idea with them (they were initially nonreceptive, but were somewhat persuaded after ensuring that the fee $ would be dedicated for ecosystem recovery). WA state well users can harvest a lot of water for free from the groundwater, a small annual fee doesn't seem unacceptable for that privilege.

From: Amber Knox

Comment: I live on Longfellow Creek, and I see lots of runoff from the surrounding streets go directly into the water. Please advocate for installation of "green streets" and natural filtration projects throughout the Puget Sound basin - even in lower-income neighborhoods.

From: Janet Knox

Comment: Now is the time to act to save the Sound. I write in support of the Draft Action Agenda and to take it further, to establish a funding source to support environmental changes in the region that will not only benefit the Sound, but benefit all our health and the world's climate. We must work to stop loading PAHs, PCBs, pesticides, and metals into the Sound. When we do, we will provide incentives for citizens to get out of their cars and into public and non-motorized transport. We need incentives for electric cars and solar energy generation. We need to support the Draft Action Agenda.

From: Jacqueline Koch

Comment: Dear Puget Sound Partnership,

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Thank you for this opportunity to strengthen a strategy to save Puget Sound

From: Ty Kocher

Comment: Dear Puget Sound Partnership,

Thank you for your hard work to develop a draft Action Agenda to restore, protect and recover Puget Sound to health by 2020. When it comes to restoring the health of the Puget Sound, where and how we grow matters. Especially in light of the one million new residents the state expects to welcome by 2020. It's more crucial than ever to focus that growth inside our urban areas so that we can preserve our farm and forest land and protect our rural areas to restore critical habitats and watersheds of the Sound.

While I applaud your effort thus far, the Action Agenda can and must go farther. We need a twenty year plan, not a two year plan. All the actions need to be tied together into a comprehensive plan with measurable benchmarks and timelines in order to achieve recovery by 2020.

As you finalize the final Action Agenda, please:

-Balance regulatory change with land acquisition to accomplish long term recovery goals;

-Take advantage of the region's recent vote to build 34 miles of new light rail - we must capitalize on this investment by requiring more intense development near these station areas that are pedestrian, bicycle and transit friendly;

-Identify adequate and sustained funding for the long haul;

-Clearly identify timelines and responsibilities;

-Be based on science;

-Set meaningful standards for habitat protection.

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For Puget Sound!

From: Kees Kolff

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From: Elise Koncsek

Comment: 1. on question 1, page 3, the near term goal for land cover is more stringent that the 2020 goal, so i think either the 2020 goal should be tightened up or the columns might just need to be reversed Provisional Indicator Target - desired condition for 2020 (unless other date specified): Land cover For each action area: forest acreage below 1000 feet is at least 90% of 2001 level and impervious area is not more than 120% of 2001 level Benchmark - interim milestone: For each action area in 2011: forest acreage below 1000 feet is at least 95% of 2001 level; impervious area is not more than 110% of 2001 level

2. in this same table, i think there needs to be a measurement included that keeps track of water quality improvement (measuring oxygen levels, toxins, sedementation of streambeds, etc.) in all the major watershed streams that feed the larger bodies of water. This would help point source where more work needs to be done to decrease negative impact downstream.

From: Elise Koncsek

Comment: I would like to see a section added to specifically provide for inventorying shorelines and river banks to document how much length of water edge has significant biomass of native plant species directly lining the water-land boundary, and to a significant depth over the adjacent land. For example, to ensure that a river bank has dense and diverse native plant species reaching from the water back to at least 150 feet. I feel it is important to immediately improve efforts to replant shore areas lacking in sufficient native habitat, as a first priority, because it can take many years for the plants to mature enough to be able to fulfill their roles in keeping the natural ecosystem in balance, and with 2020 approaching we are running out of time.

From: Matt Koppelman

Comment: Overall I feel that what is the Puget Sound Partnership's Draft Action Agenda has laid out is going to work out very well. The five strategies which have been presented, protection, restoration, preventing water pollution, working together, and implementing a new management system, are all very good starts to helping fix the state of Puget Sound. Everything seems to be on the right track and leading our community to a more healthy future. For the protection section of the Action Agenda I think what the Puget Sound Partnership has proposed is a great idea.

It is essential to decrease habitat fragmentation due to all the poor effects that it has on the rest of ecosystem. It is nice to see that the Partnership is trying to directly solve this problem by making it one their main priorities. Along with fragmentation, it is good to see all other areas continuing to be protected from further environmental harm. The restoration plan laid out by the Partnership also seems very good. It is essential to restore many different types of habitats that provide many diverse functions to the Puget Sound region. It still seems essential to me to work on specific sites because there are certainly specific areas that are in the most need. However, the idea of moving to more extensive area will be probably be

better for the ecosystem as a whole.

The reduction of water pollution I think may be the most important issue that the Puget Sound Partnership is trying to address. Water pollution is a problem for nearly every species in the area. They all use the water in some way from being their direct habitat to using it for drinking. The water's quality is very important to the ecosystem as a whole and if we can successfully clean it up and reduce the amount of pollutants that enter the system it will improve the entire region. Collaboration in the work that needs to be done is also very essential. In order to be successful the people in Puget Sound need to work together. It is not just the state of Washington involved, but Canada and other U.S. states as well. All these different political groups will have differing views on what needs to be done. It is essential that we set up a plan to work together because the crossing of boundaries can cause many complications for cleaning up Puget Sound.

Finally, I think that building a solid management system would be very effective as well. There are several differing components that must be considered throughout this plan. If there is no organization to this situation then it will be very difficult to implement everything. Overall I think that what the Puget Sound Partnership has come up with in its draft Action Agenda plan. It is exciting to see that our government is doing something to try and clean up Puget Sound. I'm looking forward to it and am hoping that we can improve our region.

PugetSoundPartnership
our sound, our community, our chance

From: Amy Kosche

Comment: Dear Puget Sound Partnership,

I am writing to urge you to improve your action agenda's recommendations on pollution prevention.

From: Michael Kovacs

Comment: Dear Puget Sound Partnership,

I am writing to urge you to improve your action agenda's recommendations on pollution prevention. I want a healthy Puget Sound to be part of the legacy we leave our children.

Many Washington manufacturers continue to use harmful chemicals without any plans to switch to chemicals that are safer for Puget Sound. To protect public health and the environment, Washington's industry must begin phasing out of the worst toxic chemicals and developing plans to switch to safer alternatives.

Please include recommendations to help move Washington's businesses toward safer alternatives and away from chemicals known to be harmful to Puget Sound. These proposals should include:

Increasing the availability of technical assistance to help businesses reduce chemical use.

Developing a state program to focus on researching safer chemicals and materials.

Requiring better industry reporting to Ecology of the chemicals currently being used.

From: Dina Kovarik

Comment: Dear Puget Sound Partnership,

This is an incredibly exciting time to be a Seattlite, to watch those who share my values act to protect our Sound.

The Partnership staff, the Leadership Council, Ecosystem Coordinating Board, Science Panel and stakeholders throughout the Sound deserve praise for the monumental effort involved in producing the draft Action Agenda. The next step is to finalize a plan that is accountable, transparent, effective and have dedicated new funding sources to the recovery of Puget Sound by 2020.

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From: Dina Kovarik

Comment: Dear Leadership Council,

Thank you for the opportunity to comment on the Puget Sound Partnership Draft Action Agenda. I appreciate the tremendous amount of work that has gone into developing it and I support the strong list of measures that, if implemented, will go a long way toward recovering Puget Sound by 2020.

The draft plan includes a few omissions. The final plan should include Outstanding Resource Water (ORW) designation under the Clean Water Act as a tool to help protect rivers and other aquatic habitat. While I strongly support the inclusion of Wild and Scenic designation as a similar tool, in some cases ORW designation will likely prove to be a better, more immediate way for the state to ensure the protection of high quality rivers and other waters. Therefore, I urge the Partnership to include support for the Outstanding Resource Water designation as one of its "Near Term Actions." ORW designations permanently protect high quality waters that are ecologically significant, provide cold water refuges for fish, and/or support important recreational values. Many rivers in the Puget Sound region are eligible for ORW designation. I would also like to encourage you to include funds to move up the removal of the two dams on the Elwha from 2012 to 2010. Removal of the Elwha dams is one of the best chances for salmon and steelhead recovery in the region as it will open up over 70 miles of prime spawning habitat. Removing these dams has also been as a key action to recover our Puget Sound's orca population, which is malnourished thanks to a lack of chinook salmon.

Especially during difficult financial times, finding opportunities for economic benefit and job creation is important. Removing the Elwha dams provides a tremendous opportunity for creating "green jobs" and numerous other economic benefits.

From: Katherine Kozisek

Comment: Dear Puget Sound Partnership,

I am writing to urge you to improve your action agenda's recommendations on pollution prevention.

From: Nancy Kreider

Comment: Dear Puget Sound Partnership,

Thank you for your commitment to developing an Action Agenda for a healthy Puget Sound. From struggling orcas to toxic chemicals in our water, the Sound needs quick and decisive action today. I want to make sure we pass a thriving Puget Sound on to future generations.

I urge the Partnership to incorporate accountability, benchmarks of success, and ample funding into this Agenda.

The draft Action Agenda includes many of the essential elements that need to be accomplished,

but in addition, the final Action Agenda must also:

-Amend the Cruise Ship MOU to ban all cruise ship discharges in Puget Sound;

-Prioritize the protection and restoration of the State's forage fish spawning beds;

-Complete the Management Plan for the Cherry Point Aquatic Reserve;

-Identify adequate and sustained funding for Plan implementation;

-Update the guidance for open water dredge disposal of PCBs;

-Expand the indicator species to include forage fish abundance and harbor seal toxics loading; and

-Accelerate the restoration of the Elwha River.

Thank you for your hard work to develop a draft Action Agenda to restore, protect and recover Puget Sound to health by 2020.

On behalf of everything from eelgrass to orcas.

From: Melanie Kristoferson

Comment: Dear Puget Sound Partnership,

I am writing to urge you to improve your action agenda's recommendations on pollution prevention.

From: Ellen Kritzman

Comment: I commend your integrated and broad approach to maintaining/restoring Puget Sound's health. I do support the People for Puget Sound's call for going beyond a list of proposed actions -- for example, identifying the sustained funding sources, including new ones, that would allow achievement of desired goals; clearly identifying stormwater and toxic pollution prevention and benchmarks for that. I also look forward to setting the preservation of Vashon's significant offshore habitats, less degraded than the rest of King Co., into the broader picture and recognize that the Sound's health requires their preservation before it is necessary to do mitigation and restoration. Colvos Passage is a proposed marine reserve; Maury Island is already a reserve, based on sound science and long years of evaluation. Indeed, this document calls for "permanently protecting the significant intact areas of the Puget Sound ecosystem that still function well." It also calls for preserving existing eelgrass beds and expanding them. Recognition is given to the fact that "Putting in a dock or building a bulkhead could very well make it more difficult for our starving resident orca to find food." I urge you, in light of these issues as well as others, to see that the greatly expanded Glacier Northwest mining operation is not permitted.

From: Larry Laarson

Comment: Dear Puget Sound Partnership,

Thank you for your hard work to develop a draft Action Agenda to restore, protect and recover Puget Sound to health by 2020. When it comes to restoring the health of the Puget Sound, where and how we grow matters. Especially in light of the one million new residents the state expects to welcome by 2020. It's more crucial than ever to focus that growth inside our urban areas so that we can preserve our farm and forest land and protect our rural areas to restore critical habitats and watersheds of the Sound.

While I applaud your effort thus far, the Action Agenda can and must go farther. We need a twenty year plan, not a two year plan. All the actions need to be tied together into a comprehensive plan with measurable benchmarks and timelines in order to achieve recovery by 2020.

As you finalize the final Action Agenda, please:

-Balance regulatory change with land acquisition to accomplish long term recovery goals;

-Take advantage of the region's recent vote to build 34 miles of new light rail - we must capitalize on this investment by requiring more intense development near these station areas that are pedestrian, bicycle and transit friendly;

-Identify adequate and sustained funding for the long haul;

-Clearly identify timelines and responsibilities;

-Be based on science;

-Set meaningful standards for habitat protection.

The Partnership staff, the Leadership Council, Ecosystem Coordinating Board, Science Panel and stakeholders throughout the Sound deserve praise for the monumental effort involved in producing the draft Action Agenda. The next step is secure much needed funding. The 2009 legislature must adopt new funding sources dedicated to the recovery of Puget Sound by 2020.

For Puget Sound!

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From: Rose Lagerberg

Comment: Dear Puget Sound Partnership,

The Partnership staff, the Leadership Council, Ecosystem Coordinating Board, Science Panel and stakeholders throughout the Sound deserve praise for the monumental effort involved in producing the draft Action Agenda. The next step is to finalize a plan that is accountable, transparent, effective and have dedicated new funding sources to the recovery of Puget Sound by 2020.

We would like to see a plan that clearly identifies the specific actions that are needed over the next 12 years and the HOW and WHO and BY WHEN each action must be completed.

Thank you for taking my comments.

From: Tai Lahans

Comment: Dear Puget Sound Partnership,

I am writing to urge you to improve your action agenda's recommendations on pollution prevention. We are on a treadmill of automated greed and irresponsibility with nothing meaningful ever happening. If the state is in the midst of a shortfall, utilize the laws already in place to fine those responsible for polluting the Sound and killing salmon species and orca whales. Make the fines substantial enough to actually change behavior. As legislators fight for our very survival by fighting for the survival of Puget Sound and all of its inhabitants.

From: John Lahti

Comment: Dear Puget Sound Partnership,

The Partnership staff, the Leadership Council, Ecosystem Coordinating Board, Science Panel and stakeholders throughout the Sound deserve praise for the monumental effort involved in producing the draft Action Agenda. The next step is to finalize a plan that is accountable, transparent, effective and have dedicated new funding sources to the recovery of Puget Sound by 2020.

The Partnership must create a real 2020 Action Agenda, not just a 2-year plan that clearly identifies the specific actions that are needed over the next 12 years and the HOW and WHO and BY WHEN each action must be completed. All the actions need to be tied together into a comprehensive whole through measurable benchmarks that must be accomplished in order to achieve recovery by 2020.

From: Sue Lahti

Comment: Dear Puget Sound Partnership,

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Thank you for this opportunity to strengthen a strategy to save Puget Sound.

From: Brad Lambert

Comment: Dear Puget Sound Partnership,

GET rid of the gillnets. tribal and non-tribal. end the commercial fishing.

Hood Canal salmon runs are in dire straights. Hood Canal HAD good fishing in the past before commercial fishing was allowed - now the fishing is awful. BECAUSE OF COMMERCIAL TRIBAL AND NON TRIBAL GILLNETTING and commercial fishing.

The existing 1% of historical salmon runs is not the standard we should accept and divide up for commercial and sport fishing (tribal and non tribal). We must get our salmon runs back to pre 2oth century levels as they are literally all supplemented runs by hatcheries and they are failing and whats left is being slaughtered - do something. drastic measures are in order - STOP THE COMMERCIAL FISHING IN HOOD CANAL.

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From: Kathy Lange

Comment: Dear Puget Sound Partnership,

I am writing to urge you to improve your action agenda's recommendations on pollution prevention. I want a healthy Puget Sound to be part of the legacy we leave our children.

Many Washington manufacturers continue to use harmful chemicals without any plans to switch to chemicals that are safer for Puget Sound. To protect public health and the environment, Washington's industry must begin phasing out of the worst toxic chemicals and developing plans to switch to safer alternatives.

Please include recommendations to help move Washington's businesses toward safer alternatives and away from chemicals known to be harmful to Puget Sound. These proposals should include:

- Increasing the availability of technical assistance to help businesses reduce chemical use.

- Developing a state program to focus on researching safer chemicals and materials.

- Requiring better industry reporting to Ecology of the chemicals currently being used.

From: Jane Larson

Comment: Dear Puget Sound Partnership,

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Thank you for this opportunity to strengthen a strategy to save Puget Sound.

From: Judy Larson

Comment: Dear Puget Sound Partnership,

I am writing to urge you to improve your action agenda’s recommendations on pollution prevention.

Municipal outfalls which concentrate haman impacts need to be additionally monitored for

temperature effects (damaging eelgrass/habitat for various species) AND for residual endocrine disrupters that survive usual treatment protocals.

From: Heidi Laursen

Comment: Dear Puget Sound Partnership,

Thank you for your commitment to developing an Action Agenda for a healthy Puget Sound. From struggling orcas to toxic chemicals in our water, the Sound needs quick and decisive action today. I want to make sure we pass a thriving Puget Sound on to future generations.

I urge the Partnership to incorporate accountability, benchmarks of success, and ample funding into this Agenda.

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-Identify adequate and sustained funding for Plan implementation;

-Update the guidance for open water dredge disposal of PCBs;

-Expand the indicator species to include forage fish abundance and harbor seal toxics loading; and

-Accelerate the restoration of the Elwha River.

Thank you for your hard work to develop a draft Action Agenda to restore, protect and recover Puget Sound to health by 2020.

On behalf of everything from eelgrass to orcas.

From: Gabriel Lavalle

Comment: Dear Puget Sound Partnership,

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From: Charles Lawson

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and

-Accelerate the restoration of the Elwha River.

Thank you for your hard work to develop a draft Action Agenda to restore, protect and recover Puget Sound to health by 2020.

From: Patricia Layden

Comment: Dear Puget Sound Partnership,

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On behalf of everything from eelgrass to orcas.

From: Aja Leafe-Hall

Comment: Dear Puget Sound Partnership,

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The Partnership must create a real 2020 Action Agenda, not just a 2-year plan that clearly identifies the specific actions that are needed over the next 12 years and the HOW and WHO and BY WHEN each action must be completed. All the actions need to be tied together into a comprehensive whole through measurable benchmarks that must be accomplished in order to achieve recovery by 2020.

Thank you for this opportunity to strengthen a strategy to save Puget Sound. Please don't miss your chance to permanently change the fate of the sound. We citizens wan't nothing more than for our children and grandchildren to know a Puget Sound which is healthier, and certainly not any worse off, than it is today. Know that we are in support of effective action, NOW.

From: Rae Deane Leatham

Comment: Dear Puget Sound Partnership,

Thank you for your hard work to develop a draft Action Agenda to restore, protect and recover Puget Sound to health by 2020. When it comes to restoring the health of the Puget Sound, where and how we grow matters. Especially in light of the one million new residents the state expects to welcome by 2020. It's more crucial than ever to focus that growth inside our urban areas so that we can preserve our farm and forest land and protect our rural areas to restore critical habitats and watersheds of the Sound.

While I applaud your effort thus far, the Action Agenda can and must go farther. We need a twenty year plan, not a two year plan. All the actions need to be tied together into a comprehensive plan with measurable benchmarks and timelines in order to achieve recovery by 2020.

As you finalize the final Action Agenda, please:

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The Partnership staff, the Leadership Council, Ecosystem Coordinating Board, Science Panel and stakeholders throughout the Sound deserve praise for the monumental effort involved in producing the draft Action Agenda. The next step is secure much needed funding. The 2009 legislature must adopt new funding sources dedicated to the recovery of Puget Sound by 2020.

From: Wendy Leavitt

Comment: Dear Puget Sound Partnership,

I have been following news about the progress made by the Partnership staff, the Leadership Council, Ecosystem Coordinating Board, Science Panel and stakeholders for the past several weeks and you deserve thanks for the apparent sense of urgency and responsibility which resulted in production of the draft Action Agenda. The next step is to finalize a plan that is accountable and transparent and has the dedicated new funding sources required to make it successful. Without that, all your hard work will be just a waste of time, and we seem to have so little left to us to get this vital job done.

PLEASE now proceed to finalize and fund a real 2020 Action Agenda, which clearly identifies the specific actions that are needed over the next 12 years.

From: Shirley Leckman

Comment: Dear Puget Sound Partnership,

I am writing to urge you to improve your action agenda's recommendations on pollution prevention. I want a healthy Puget Sound to be part of the legacy we leave our children.

Many Washington manufacturers continue to use harmful chemicals without any plans to switch to chemicals that are safer for Puget Sound. To protect public health and the environment, Washington's industry must begin phasing out of the worst toxic chemicals and developing plans to switch to safer alternatives.

Please include recommendations to help move Washington's businesses toward safer alternatives and away from chemicals known to be harmful to Puget Sound. These proposals should include:

- Increasing the availability of technical assistance to help businesses reduce chemical use.

- Developing a state program to focus on researching safer chemicals and materials.

- Requiring better industry reporting to Ecology of the chemicals currently being used.

From: Christine Lee

Comment: I am please to learn about this organization. Please fund this program, esp in light of the recent dire news about our resident orcas. Thanks.

From: Marc Lee

Comment: Dear Puget Sound Partnership,

The Partnership staff, the Leadership Council, Ecosystem Coordinating Board, Science Panel and stakeholders throughout the Sound deserve praise for the monumental effort involved in producing the draft Action Agenda. The next step is to finalize a plan that is accountable, transparent, effective and have dedicated new funding sources to the recovery of Puget Sound by 2020.

The Partnership must create a real 2020 Action Agenda, not just a 2-year plan that clearly identifies the specific actions that are needed over the next 12 years and the HOW and WHO and BY WHEN each action must be completed. All the actions need to be tied together into a comprehensive whole through measurable benchmarks that must be accomplished in order to achieve recovery by 2020.

Thank you for this opportunity to strengthen a strategy to save Puget Sound.

From: Carolyn Leith

Comment: Dear Puget Sound Partnership,

Thank you for your commitment to developing an Action Agenda for a healthy Puget Sound. From struggling orcas to toxic chemicals in our water, the Sound needs quick and decisive action today. I want to make sure we pass a thriving Puget Sound on to future generations.

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-Expand the indicator species to include forage fish abundance and harbor seal toxics loading; and

-Accelerate the restoration of the Elwha River.

Thank you for your hard work to develop a draft Action Agenda to restore, protect and recover Puget Sound to health by 2020.

From: Sharon LeMire

Comment: Read article in Seattle Times and want to express my concern over our dying Puget Sound. I sailed for ten years and found we use our Sound as toilet bowl..dumping anything and everything into it. California has stricter laws ie governing types of lawn mower emissions...I stronger support stricter laws in environmental protection water, air ..we need to think in seven generations and what they will inherit..find ways for the individual to contribute and educate people of what this means if we dont take of our water and earth..we can see just in my lifetime the changes to our planet that are not maintaining life here.. I am for spending on ed programs for our youth and the public..

From: Jennifer Lenhart

Comment: Dear Puget Sound Partnership,

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Thank you for your hard work to develop a draft Action Agenda to restore, protect and recover Puget Sound to health by 2020.

On behalf of everything from eelgrass to orcas.

From: Brian Levin

Comment: Dear Puget Sound Partnership,,

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Thank you for your hard work to develop a draft Action Agenda to restore, protect and recover Puget Sound to health by 2020.

On behalf of everything from eelgrass to orcas.

From: Mark Levine

Comment: Perhaps the whole world is symptomatically plagued by Blackberrys, computers, email and voice messaging. We are all reacting and responding too quickly to issues that effect the long-term viability of our community. It is unconscionable to me that discussions of property rights, shoreline management and the effects thereof on our environment would take place without including property owners in the Puget Sound Partnership. Property owners are the true stakeholders of the shoreline. Without them there is a total misrepresentation of the Partnership's Action Agenda. I urge you to reconsider your membership if, in fact, your Action Agenda is to be relevant. The purpose of your actions and procedures are negated by not having property owners at the table. This is a flawed process and government without representation.

From: Mike Levine

Comment: Dear Puget Sound Partnership,

Thank you for tackling the enormous challenge of saving Puget Sound head on. We appreciate your boldness and your efforts to engage the broader community, to listen to us and to base your decisions on science.

Surfrider Foundation is committed to supporting your efforts, primarily by encouraging people to get out in the watershed and into the Sound, to enjoy it, to appreciate it and to take action to protect and restore it. Through projects like Rise Above Plastics, beach clean ups and ocean friendly gardens, we will do our best to promote Sound stewardship practices.

In order to make sure that we reach our goal of a healthy Puget Sound by 2020, we ask that you strengthen the Action Agenda by incorporating the following recommendations:

- Be stronger on water quality measures by offering a comprehensive and robust program to prevent all sources of stormwater pollution and strengthening the list of actions for toxic pollution prevention.

- Develop different indicators for human well-being to include more opportunity for quality water-based recreation through increased shoreline access, clean beaches, and clean water.

- Be stronger on accountability by incorporating clear benchmarks to get us to a healthy Puget Sound by 2020.

- Create more opportunities and stronger protection programs to improve the public's interaction with the shoreline and achieve enough water quality improvement and habitat restoration to inspire the public to go to the water's edge more frequently.

- Ensure that there is enough funding for Puget Sound to achieve the goals laid out in this ambitious agenda.

Thank you for your hard work to develop a draft Action Agenda to restore, protect and recover Puget Sound to health by 2020.

From: Rachael Levine

Comment: Dear Puget Sound Partnership,

I am writing to urge you to improve your action agenda's recommendations on pollution prevention.

Protecting the ability of Puget Sound to support the marine life there, also protects land creatures from the effects of toxic materials. What we have to lose by not being responsible are both known effects and unknown ones that may occur in the future.

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From: Sharon LeVine

Comment: Dear Puget Sound Partnership,

I am writing to urge you to improve your action agenda's recommendations on pollution prevention. I want a healthy Puget Sound to be part of the legacy we leave our children.

Many Washington manufacturers continue to use harmful chemicals without any plans to switch to chemicals that are safer for Puget Sound. To protect public health and the environment, Washington's industry must begin phasing out of the worst toxic chemicals and developing plans to switch to safer alternatives.

Please include recommendations to help move Washington's businesses toward safer alternatives and away from chemicals known to be harmful to Puget Sound. These proposals should include:

- Increasing the availability of technical assistance to help businesses reduce chemical use.

- Developing a state program to focus on researching safer chemicals and materials.

- Requiring better industry reporting to Ecology of the chemicals currently being used.

From: Peggy Leviton

Comment: Dear Puget Sound Partnership,

I am writing to urge you to improve your action agenda's recommendations on pollution prevention.

From: Kathlyn Lew

Comment: Dear Puget Sound Partnership,

I am writing to urge you to improve your action agenda's recommendations on pollution prevention.

From: Brenda Lewis

Comment: Dear Puget Sound Partnership,

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Thank you for your hard work to develop a draft Action Agenda to restore, protect and recover Puget Sound to health by 2020.

On behalf of everything from eelgrass to orcas.

From: Lori Lewis

Comment: Dear Puget Sound Partnership,

Thank you for your hard work to develop a draft Action Agenda to restore, protect and recover Puget Sound to health by 2020. It could not come at a more pressing time, especially for the Sound's iconic and endangered orca whale. Just this month, researchers reported seven orcas "10% of the Puget Sound population" are missing and believed to be dead. Some experts say dwindling populations of endangered Chinook salmon are at least partly to blame. Is this a sign that our ecosystem is on the verge of collapsing?

The urgency of restoring the Sound to health is at a tipping point and missing orcas are the Sound's "canaries in the coal mine," telling us we are running out of time. But there is hope for the orca, as there was hope for the bald eagle, the California Condor and others on the verge of extinction. The Puget Sound Partnership's Action Agenda is a golden opportunity to do what has not been done for over 20 years- develop and implement a recovery plan that is accountable, effective, transparent and decisive with sustained funding to restore this national treasure to health by 2020.

The draft Action Agenda includes many of the essential elements that need to be done:

-Require low-impact development to reduce stormwater pollution;

-Prohibit new bulkheads near feeder bluffs and forage fish spawning beaches;

-Fund local governments to develop and carry out shoreline master programs;

-Fund enforcement staff at state agencies and local governments;

-Implement specific, aggressive cleanup plans for polluted waters, including TMDLs;

-Fully fund a permanent year-round rescue tug at Neah Bay for oil spill prevention;

-Acquire critical intact parcels for habitat protection and conservation;

-Set strong requirements for water quantity, such as setting in-stream flow for all major rivers.

BUT, more than a list of Soundwide and Action Area-specific actions, the Partnership must create a real 2020 Action Agenda, not just a 2-year plan, that clearly identifies the specific actions that are needed over the next 12 years and the HOW and WHO and BY WHEN each action must be completed. All the actions need to be tied together into a comprehensive plan with measurable benchmarks and timelines in order to achieve recovery by 2020. The final Action Agenda must:

-Clearly identify timelines and responsibilities;

-Identify adequate and sustained funding for the long haul;

-Be a visionary and long term plan;

-Be based on science;

-Offer a comprehensive and robust program to prevent all sources of stormwater pollution, not just municipal stormwater;

-Strengthen the list of actions for toxic pollution prevention;

-Set meaningful standards for habitat protection;

-Balance regulatory change with land acquisition to accomplish long term recovery goals;

-Expand the indicator species to include more than just salmon, i.e. forage fish, harbor seals, etc.

The Partnership staff, the Leadership Council, Ecosystem Coordinating Board, Science Panel and stakeholders throughout the Sound deserve praise for the monumental effort involved in producing the draft Action Agenda. The next step is secure much needed funding. The 2009 legislature must adopt new funding sources dedicated to the recovery of Puget Sound by 2020.

For Puget Sound!

From: Nancy Lill

Comment: Dear Puget Sound Partnership,

I am writing to urge you to improve your action agenda recommendations on pollution prevention.

From: Dennis Linden

Comment: Dear Puget Sound Partnership,

Under D.3.8: We need a much stronger educational awareness of our transboundary ecosystem, rather than this narrow focus on an area much wider than the marine boundaries of the Puget Sound. The Salish Sea, is a region and a concept that needs to be recogized. During the last PSP meeting, Canada was grayed out in the slide that dealt with population growth of ?Puget Sound? (using their definition, which goes all the way to the Canadian border). This kind of thinking limits our real understanding of the ecosystem and the impacts of population and its effects (storm water, sewage, marine traffic) climate change and toxins, not to mention protection of our transboundary species, notably orcas, salmon, and marine birds. This needs to be specifically addressed in slide shows, printed material and public presentations. The term Puget Sound can be still be used but it must include a side note that references the whole transboundary bioregion.

In addition, this section needs to include a transboundary Management Action task force, supporting frequent communications and cooperation on both sides of border. This is not widening the scoop of your efforts but rather designed a system that is more realistic considering the dynamics of our waters which carry no passport. THINK BIGGER IF SOLUTIONS ARE TO HAVE ANY IMPACT IN THE REAL WORLD BEYOND PANEL DISCUSSIONS.

From: Krista Lindgren

Comment: Dear Puget Sound Partnership,

I am writing to urge you to improve your action agenda's recommendations on pollution prevention. I want a healthy Puget Sound to be part of the legacy we leave our children.

Many Washington manufacturers continue to use harmful chemicals without any plans to switch to chemicals that are safer for Puget Sound. To protect public health and the environment, Washington's industry must begin phasing out of the worst toxic chemicals and developing plans to switch to safer alternatives.

Please include recommendations to help move Washington's businesses toward safer alternatives and away from chemicals known to be harmful to Puget Sound. These proposals should include:

Increasing the availability of technical assistance to help businesses reduce chemical use.

Developing a state program to focus on researching safer chemicals and materials.

Requiring better industry reporting to Ecology of the chemicals currently being used.

From: Monica Lisafeld

Comment: Dear Puget Sound Partnership,

I am writing to urge you to improve your action agenda's recommendations on pollution prevention. I want a healthy Puget Sound to be part of the legacy we leave our children.

Many Washington manufacturers continue to use harmful chemicals without any plans to switch to chemicals that are safer for Puget Sound. To protect public health and the environment, Washington's industry must begin phasing out of the worst toxic chemicals and developing plans to switch to safer alternatives.

Please include recommendations to help move Washington's businesses toward safer alternatives and away from chemicals known to be harmful to Puget Sound. These proposals should include

Increasing the availability of technical assistance to help businesses reduce chemical use.

Developing a state program to focus on researching safer chemicals and materials.

Requiring better industry reporting to Ecology of the chemicals currently being used.

From: Kevan Lisowski

Comment: Dear Puget Sound Partnership,

Thank you for tackling the enormous challenge of saving Puget Sound head on. We appreciate your boldness and your efforts to engage the broader community, to listen to us and to base your decisions on science.

Surfrider Foundation is committed to supporting your efforts, primarily by encouraging people to get out in the watershed and into the Sound, to enjoy it, to appreciate it and to take action to protect and restore it. Through projects like Rise Above Plastics, beach clean ups and ocean friendly gardens, we will do our best to promote Sound stewardship practices.

In order to make sure that we reach our goal of a healthy Puget Sound by 2020, we ask that you strengthen the Action Agenda by incorporating the following recommendations:

- Be stronger on water quality measures by offering a comprehensive and robust program to prevent all sources of stormwater pollution and strengthening the list of actions for toxic pollution prevention.

- Develop different indicators for human well-being to include more opportunity for quality water-based recreation through increased shoreline access, clean beaches, and clean water.

- Be stronger on accountability by incorporating clear benchmarks to get us to a healthy Puget Sound by 2020.

- Create more opportunities and stronger protection programs to improve the public's interaction

with the shoreline and achieve enough water quality improvement and habitat restoration to inspire the public to go to the water's edge more frequently.

- Ensure that there is enough funding for Puget Sound to achieve the goals laid out in this ambitious agenda.

Thank you for your hard work to develop a draft Action Agenda to restore, protect and recover Puget Sound to health by 2020. I for one enjoy the straits and everything they have to offer.

With world class surf, intriguing wildlife, and a exotic beauty.

This is such a beautiful effort and it makes me so stoked to see people taking initiative to make a huge difference in this world.

From: Gillars Llarson

Comment: Dear Puget Sound Partnership,

Thank you for your commitment to developing an Action Agenda for a healthy Puget Sound. From struggling orcas to toxic chemicals in our water, the Sound needs quick and decisive action today. I want to make sure we pass a thriving Puget Sound on to future generations.

I urge the Partnership to incorporate accountability, benchmarks of success, and ample funding into this Agenda.

The draft Action Agenda includes many of the essential elements that need to be accomplished, but in addition, the final Action Agenda must also:

-Amend the Cruise Ship MOU to ban all cruise ship discharges in Puget Sound;

-Prioritize the protection and restoration of the State's forage fish spawning beds;

-Complete the Management Plan for the Cherry Point Aquatic Reserve;

-Identify adequate and sustained funding for Plan implementation;

-Update the guidance for open water dredge disposal of PCBs;

-Expand the indicator species to include forage fish abundance and harbor seal toxics loading; and

-Accelerate the restoration of the Elwha River.

Thank you for your hard work to develop a draft Action Agenda to restore, protect and recover Puget Sound to health by 2020.

On behalf of everything from eelgrass to orcas.

From: Bill Loeber

Comment: Dear Puget Sound Partnership,

The Partnership staff, the Leadership Council, Ecosystem Coordinating Board, Science Panel and stakeholders throughout the Sound deserve praise for the monumental effort involved in producing the draft Action Agenda. The next step is to finalize a plan that is accountable, transparent, effective and have dedicated new funding sources to the recovery of Puget Sound by 2020.

The Partnership must create a real 2020 Action Agenda, not just a 2-year plan that clearly identifies the specific actions that are needed over the next 12 years and the HOW and WHO and BY WHEN each action must be completed. All the actions need to be tied together into a comprehensive whole through measurable benchmarks that must be accomplished in order to achieve recovery by 2020.

Thank you for this opportunity to strengthen a strategy to save Puget Sound.

From: John Lombard

Comment: Unfortunately, I now have the stomach bug that my kids have had over the past few days, so I will not be able to attend this morning's Leadership Council meeting to deliver these remarks in person. Please do distribute them to the Council members and others at the Partnership.

PugetSoundPartnership
our sound, our community, our ch

Mr. John Lombard
10801 – 12th Ave NE
Seattle, WA 98125
johnlombard@clearwire.net

November 21, 2008

Mr. Bill Ruckelshaus
Chair, Leadership Council
Puget Sound Partnership
PO Box 40900
Olympia, WA 98504-0900

Dear Mr. Ruckelshaus:

I'd like to begin by acknowledging that this is my first public testimony to the Leadership Council. However, it is not my first participation with the Partnership. I have attended the Land Use/Habitat topic forum and a Whidbey Action Area meeting, e-mailed comments to the Leadership Council in July and 10 days ago, met with David Dicks twice, and Martha Kongsgaard even audited my University of Washington class on the Puget Sound ecosystem last year!

As I said in my message 10 days ago, if I have anything to pass on from my own experience proposing a conservation strategy for Puget Sound, it is to avoid getting lost in the details. Details are a necessary part of the strategy, but they need to be guided by an overall grasp of the conservation challenge we face as a region and an ability to articulate that. I think our challenge can be simply stated as how to pass on our extraordinary natural legacy in the face of population growth and climate change.

Today, I want to briefly elaborate on the economic issues discussed in my last message. I see these issues as the quintessential combination of both challenge and opportunity. We currently subsidize environmental degradation to an enormous degree and in all kinds of ways: from my not paying the ecological cost of withdrawing the water that I use from local streams and aquifers to polluters not paying the ecological cost of what we legally permit them to discharge. At the same time, the Partnership needs hundreds of millions of dollars on an annual basis to implement its recommendations—including compensation to landowners for ecological services, which is just as important an economic issue as the subsidies. Addressing the subsidies can meet your revenue needs—potentially enough so to reduce property or sales taxes substantially at the same time. Specific ideas for how to do this are in my book.

Almost all discussion of environmental taxes or fees has focused on the national level, for taxes on oil, gas, or carbon emissions. But beside greenhouse gas emissions, almost all of the environmental consequences of the behaviors we subsidize are felt primarily or exclusively at the local or regional level.

If we are going to set taxes or fees to address them, they ought to be raised and spent here.

As I noted in my last letter, this is the opposite of social engineering. It works with the market, and in the same way the market performs its job: through price signals, which individuals and businesses then can respond to based on their own needs and values. Without this sort of intervention, though, the market sends what we know are incorrect signals on actions with environmental costs and all of us literally end up paying the price.

As always, I wish you well in the difficult job ahead of you. If you choose to take up the suggestions that I have made here, I will help in any way that I can.

Sincerely,

John Lombard

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From: Sandra Lord

Comment: Dear Leadership Council,

Thank you for the opportunity to comment on the Puget Sound Partnership Draft Action Agenda. I appreciate the tremendous amount of work that has gone into developing it and I support the strong list of measures that, if implemented, will go a long way toward recovering Puget Sound by 2020.

The draft plan includes a few omissions. The final plan should include Outstanding Resource Water (ORW) designation under the Clean Water Act as a tool to help protect rivers and other aquatic habitat. While I strongly support the inclusion of Wild and Scenic designation as a similar tool, in some cases ORW designation will likely prove to be a better, more immediate way for the state to ensure the protection of high quality rivers and other waters. Therefore, I urge the Partnership to include support for the Outstanding Resource Water designation as one of its "Near Term Actions." ORW designations permanently protect high quality waters that are ecologically significant, provide cold water refuges for fish, and/or support important recreational values. Many rivers in the Puget Sound region are eligible for ORW designation.

I would also like to encourage you to include funds to move up the removal of the two dams on the Elwha from 2012 to 2010. Removal of the Elwha dams is one of the best chances for salmon and steelhead recovery in the region as it will open up over 70 miles of prime spawning habitat. Removing these dams has also been as a key action to recover our Puget Sound's orca population, which is malnourished thanks to a lack of chinook salmon.

Especially during difficult financial times, finding opportunities for economic benefit and job creation is important. Removing the Elwha dams provides a tremendous opportunity for creating "green jobs" and numerous other economic benefits.

Thank you for taking my comments into consideration.

From: Sandra Lord

Comment: Dear Puget Sound Partnership,

The Partnership staff, the Leadership Council, Ecosystem Coordinating Board, Science Panel and stakeholders throughout the Sound deserve praise for the monumental effort involved in producing the draft Action Agenda. The next step is to finalize a plan that is accountable, transparent, effective and have dedicated new funding sources to the recovery of Puget Sound by 2020.

The Partnership must create a real 2020 Action Agenda, not just a 2-year plan that clearly identifies the specific actions that are needed over the next 12 years and the HOW and WHO and BY WHEN each action must be completed. All the actions need to be tied together into a comprehensive whole through measurable benchmarks that must be accomplished in order to achieve recovery by 2020.

From: Lucy Lotto

Comment: Please help save our "Farm Land" with regulated boarding facilities, etc. King County is trying to change their verbage. And with so many horses starving, why should farm land have to "breed" in order to be zoned agriculture?

From: Cheri Lovre

Comment: Dear Puget Sound Partnership,

I am writing to urge you to improve your action agenda's recommendations on pollution prevention. I own land on Orcas Island with the dream of retiring there, and have always loved the islands.

We have the chance at any point to make the right choice. This is clearly the time, and the choice needs to be to make the difference we can now, which in the end is so much less expensive than trying to clean up a bigger mess later.

Please keep me informed of ways to be further involved in this critical issue!

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PUGET SOUND PARTNERSHIP

4:55 p.m.

NATURE SAVER™ FAX MEMO 01616

To Bruce Wulkan		Date 11/19/8	tot pages ▶ 18
Co./Dept. PSP		From Timothy Lovell	
Phone # (360) 725-5455		Co. SPU	
Fax # (360) 725-5456		Phone # (206) 684-4155	
		Fax # (206) 386-9117	

Priority A: Protect Intact Ecosystem Processes, Structures, and Functions

Current situation: Altering habitat and water bodies, pollution, and other human actions described in Question 2 of the Action Agenda damage and destroy the underlying ecological processes that enable Puget Sound to be healthy and productive. Human population growth and a changing climate in Puget Sound amplify the impacts of threats to ecosystem health.

efite Success: If the creek & Sound fail, the engineering design fails "Do No Harm"

The region lacks a comprehensive, integrated habitat protection strategy to protect sites and areas with the highest ecological value. Habitat protection until now has been scattered and opportunistic. Current environmental protection measures in Puget Sound fail to protect ecosystem processes and structure because the measures were intended to protect individual pieces of the system, typically at the site scale, rather than the connections between ecosystem components across the lands and waters of the larger scale Puget Sound region. Since the 1970s, federal, state, and local governments employed numerous protective regulations, land use planning tools, acquisition of property, incentive programs, and education/stewardship programs designed to protect the environment and to manage for and minimize the adverse consequences of human population growth and associated land cover change. Despite these efforts, human use of the landscape continues to alter and degrade habitat, leaving our ecosystems at increased risk from existing and future development.

Rationale for action: Protecting high quality ecological areas is less expensive and more effective than trying to repair or recreate damaged areas. Protection of land cover is critical for making improvements in water quality. Essential to our ability to protect resources will be encouraging density in urban areas, protecting rural working lands, and avoiding sprawl. It is important to look at remaining habitat at a larger scale, determining what areas are the most ecologically intact and/or provide the greatest level of ecosystem services, and make these our highest priority for protection. An array of tools such as purchasing property and conservation easements, incentive programs, regulations and other planning tools are already available. What is needed is a strategy to match these actions with the areas that are the most important and most vulnerable.

By way of example see how Pierce County determined LID req'd areas in Gig Harbor and other community planning areas.

The Action Agenda identifies a comprehensive protection strategy for Puget Sound ecosystems that reflects five primary objectives:

- *Focus growth away from ecologically important and sensitive areas by encouraging dense, compact cities and vital rural communities.*
- *Permanently protect the significant intact areas of the Puget Sound ecosystem that still function well.*
- *Protect and conserve stream flows for natural system and human uses.*
- *Protect working resources lands.*
- *Prevent and rapidly respond to the introduction of new invasive species.*

Improving strategies and actions over time: The strategies and actions identified below will need to be refined over time. Two important areas of study identified in the Biennial Science Workplan will help refine protection strategies.

11-20-2008 05:07pm From- T-268 P.001 F-380

- A watershed scale study of changes in land use patterns as related to the condition of aquatic habitat. This information would help better understand a) how patterns of land use impact surface water runoff and harm aquatic systems, b) at a watershed-scale, how low impact development would help maintain surface and groundwater hydrology, c) what types of urban land uses are particularly harmful to aquatic systems, and d) what scientific basis can be used to help integrate land use and water resource planning.
- A study of stressors affecting the Puget Sound pelagic food web and restoration of forage fish populations. This information would help better understand a) what ecosystem processes, structures, and functions are critical to the viability of forage fish and b) how would protection of forage fish populations influence the population dynamics of valued species.
- Determine degradation cost and charge a fee to property owner on property under performing

In addition, better understanding of the effectiveness of specific protection techniques is needed.

with full service Neighborhoods ~~& full set~~ and public ~~and~~ "third places"

A.1 **Focus growth away from ecologically important and sensitive areas by encouraging dense, compact cities, vital rural communities, and protected areas that support the ecosystem Sound-wide.**

including multi modal systems

Attractive cities with appealing neighborhoods, open and vegetated spaces, quality schools, efficient transportation systems, and cultural amenities provide a quality of life that encourages businesses and helps protect the ecosystem. Growth strategies need to encourage density in areas that are designed to support it, retain rural lifestyles, and use planning tools to keep shorelines and vegetated areas intact and functional at an ecosystem scale.

Provide mass transit to rural amenities to reduce urban impacts in rural "park" lands. See ~~Yellowstone~~ Yosemite & other National park examples

Develop work/live matching system that is similar to commute trip reduction ride-match. Help ~~keep~~ people to work close to home.

A.1.1 *Build on and coordinate existing efforts to create and implement a Sound-wide vision for accommodating population and economic growth while protecting the Puget Sound ecosystem.*

A.1.1.1 Coordinate and convene existing regional planning groups and collaborative growth process to create a consistent vision for Puget Sound and avoid duplication of effort.

A.1.1.2 Periodically review and update the regional vision.

A.1.1.3 Implement existing growth plans such as Vision 2040 and others, and coordinate implementation across the Sound.

A.1.2 *Prepare and consistently use a regional habitat protection decision-making framework to guide land use protection and restoration decisions in marine, freshwater and upland terrestrial areas.* It should be designed to be applied anywhere in Puget Sound, and when applied this guidance will bring consistency to decision-making across the region.

A.1.2.1 The protection decision-making framework will include a description of the conditions where protection (through impact avoidance) is absolutely necessary to prevent disruption of ecosystem processes in the marine, freshwater and upland terrestrial areas.

A.1.2.2 Upon completion, the habitat protection decision-making framework will help guide the watershed characterizations described in A.1.3, local protection and restoration priorities, and the Action Agenda.

A.1.3 *Use watershed characterizations to set priorities for local protection and restoration work.* The characterizations will build on and expand existing efforts to more comprehensively identify important ecosystem processes in each area and will be used to refine areas that should be protected, best suited for growth and low impact development, and prioritize restoration opportunities including stormwater retrofits.

A.1.3.1 Update and map ecosystem forming processes, structures, and functions that are intact or degraded. Use the regional habitat protection decision-making framework once it is available. Build on existing knowledge including, but not limited to, watershed or river plans, salmon recovery plans, State Biodiversity Plan, Conservation Opportunity Framework, water quality plans, Shoreline Master Programs and GMA Comprehensive Plans. Future Land Use maps, FEMA mapping, and Buildable Lands Inventories. Incorporate new information from the Nearshore General Investigation Study and Climate Change strategies. The work should be performed in a collaborative method, including local governments, interest groups and citizens.

Yes

A.1.3.2 In the near-term, perform high-level, watershed characterization studies in each WRIA and associated nearshore areas to ensure that people and institutions are protecting and restoring the highest priority areas of the ecosystem at a local scale. Over the long-term, create and map the Puget Sound's interconnected ecosystem framework in terms of habitat-forming processes, structures and functions, the food web, and species biodiversity to guide decision-making about population and economic growth. Begin with coarse-scale characterization maps that identify key areas for restoration, protection and development within the fastest growing watersheds. Subsequent characterization efforts should "drill down" to more precisely indicate the high-priority areas for protection, ecologically-important areas that are minimally altered and can be effectively restored; unique, rare, or otherwise intrinsically-valuable resources; areas where more intensive development can occur without major additional adverse effects on water quality, water flow, or habitat; and areas where development pressures are most likely to conflict with or confound future mitigation and/or restoration efforts.

A.1.3.3 Using the results of the characterization, identify near- and long-term strategies and targets to protect and restore local ecosystem processes, structures and functions; refine local and regional acquisition strategies; reduce water pollution; and accommodate growth and economic development.

A.1.3.4 Incorporate the findings into federal, state and local plans, policies, and regulations, including strategies to protect natural resource industries as appropriate.

11-20-2008 05:08pm From- T-258 P.003 F-380

A.1 **Near-term Actions**

1. Convene a regional planning forum to create a coordinated vision for guiding growth at an ecosystem scale. This should include the Puget Sound Regional Council, existing collaborative process such as the Cascade and Olympic Agendas and Quality Growth Alliance, and other growth related processes for agriculture, transportation, and other sectors.

2. Prepare a set of criteria to guide decisions for acquiring and protecting high-value, high-risk habitat. Convene a working team of scientists and experts from various disciplines to produce a protection decision-making framework. Work collaboratively with the Science Panel and implementers.

3. Initiate or complete maps for each of the watersheds within the Puget Sound basin to identify sites and functions that are the most urgent and important for protection. Build on existing work such as the salmon recovery plan and other assessments and utilize local knowledge and input. Start with counties next in line to complete Shoreline Management Plan updates.

— Provide marketing/outreach plan to share information and maps with schools and citizens to foster awareness, stewardship and involvement

A.2 **Permanently protect the significant intact areas of the Puget Sound ecosystem that still function well.**

Permanent protection of intact habitat can translate to dedicated networks of open spaces, preserves, wildlife corridors, functional working resource lands, and nearshore and estuarine environments, making this a cornerstone of the Puget Sound protection strategy.

Protection tools include regulatory programs and acquisition programs, including the outright purchase of property or partial acquisition of development rights or conservation easements. Acquiring development rights from highly productive working resource lands, such as farms and forests, is an effective way to protect ecosystem processes/structures while ensuring long-term productivity of working landscapes and rural communities.

A.2.1 *Permanently protect lands at immediate risk of conversion that support intact ecosystem processes through the acquisition of full or partial property interests.*

A.2.1.1 Acquire specific lands at risk of conversion or impacts from other human activities. For the near-term, complete priority acquisition projects identified through established processes (e.g., salmon recovery and others) and/or other sub-regional acquisition strategies developed using ecosystem recovery principles. Over the long-term, acquire property identified through the watershed characterizations and protection prioritization (see A.1). For working farms and forests, use tools that keep land in production.

A.2.1.2 Establish and fund a mechanism to rapidly acquire lands at immediate risk of conversion.] Yes

A.2.1.3 Implement a strategic network of Marine Managed Areas that contribute to conserving the biological diversity and ecosystem health of Puget Sound.

11-20-2008 05:08pm From- T-258 P.004 F-380

A.2.2 *Update and implement regulatory programs related to growth and shoreline protection to increase levels of protection while increasing density in urban areas.*

A.2.2.1 Assist local governments in completing and implementing Growth Management Act, Critical Areas Ordinances, and Shoreline Master Program Updates on schedule and as written.

A.2.2.2 Provide model planning policies to local governments to improve the effectiveness of the local Growth Management Act and Shoreline Management Act programs. Priority should be given to local governments that lack technical expertise, planning staff, and funding.

A.2.2.3 Amend the Shoreline Management Act statues and rules to be more protective of nearshore environments.

A.2.2.4 Work with FEMA and local governments to prevent further residential, commercial and industrial development in floodplains.] yes

A.2.2.5 Limit density in rural areas and GMA designated natural resource lands, using a mix of tools including voluntary incentives, model ordinances, or legislation for the purposes of maintaining functioning ecosystem processes and forest cover.

A.2.2.6 Resolve barriers that currently limit density and infill development in cities and within urban growth areas, such as annexation issues, revenue sharing, and transportation concurrency.

A.2.2.7 Use development incentives to increase and improve redevelopment within urban growth areas, including those for stormwater management upgrades and restoration. Example incentives could include flexible design standards such as setbacks, building height restrictions, parking and road design; use of transfer of development rights; and property tax incentives such as the Public Benefit Rating System program.

utility locations/ ~~ex~~ extension as appropriat

Also work to allow LID/Stormwater credit for higher ceiling heights.

work w/ Fire insurance rate setters to balance w/ env'l degradation

A.2 Near-term Actions

1. Purchase high value habitat and land at immediate risk of conversion as identified through existing processes such as the salmon recovery plans and others.
2. Advocate for proposed Wilderness designations: a) Support Alpine Lakes Wilderness addition and b) Pratt River Wild and Scenic Designation
3. Convene a task force to develop a recommended mechanism to the Partnership on options to rapidly acquire properties with high ecological value and imminent risk of conversion. This work must augment and integrate with existing rapid acquisition programs.
4. Work with the Marine Managed Areas Work Group chaired by WDFW to develop recommendations to improve the effectiveness of MPAs by December 2009. Prepare to incorporate recommendations for MPAs in Puget Sound into the Action Agenda and take a lead role in implementation. In consultation with the tribes and other stakeholders, complete the management plans for existing marine managed areas (Cherry Point) and develop management plans for the following nominated reserves: Nisqually Estuary, Protection Island, and Smith Island.

insurance ex. shoreline sea rise losses

Also change to flexible ~~[illegible]~~ parking lot limits instead of min req'd [illegible] space

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5. Provide funding and technical assistance to local jurisdictions to update local shoreline management programs by current deadlines with all updates complete by 2013. Encourage consistency with the Action Agenda priorities.
6. Provide local governments with guidance regarding a strategy to achieve and measure no-net-loss of ecological function as required by the Shoreline Management Act and the Shoreline Master Program guidelines. This guidance should refer to Shoreline Master Program guidance, the multi-agency Aquatic Habitat Guidelines program, and the Puget Sound Nearshore Partnership. Produce and make available a template for monitoring no-net-loss and guidance on avoidance and minimization of impacts.
7. Change Shoreline Management Act statutes and regulations to require a shoreline conditional use permit for bulkheads and docks associated with all residential development; for all new shoreline hardening; for all seawall/bulkhead/revetment repair projects; and for new docks and piers. Changes should be made to require soft armoring techniques be used where new armoring or retrofits are unavoidable. No-net-loss of shoreline function should be required and new shoreline hardening should be prohibited in areas with feeder bluffs. New over water structures or shoreline hardening in the vicinity of forage fish spawning areas and eel grass beds should also be restricted.

A.3 **Protect and conserve freshwater resources to increase and sustain water availability for instream and human uses.**

Surface water flows and groundwater resources in most watersheds of Puget Sound have been compromised as a result of dams, other modifications, loss and change of vegetative cover, and water withdrawals for municipal, domestic, commercial, industrial, and agricultural water supplies. As a result, Puget Sound aquatic habitats are degraded, native species have experienced a reduction in abundance, viability, and diversity, and there is an uncertain future water supply for human consumption. Of the 19 primary watersheds in Puget Sound, 11 are known to have low flows that maybe limiting to fish survival and 17 are listed as having potential flow problems for salmon.

A comprehensive approach to protecting year-round, instream flows is needed for Puget Sound watersheds. Current approaches to managing streamflows, water use, land use, and stormwater management are fragmented and the many programs that address water quantity are not coordinated. A fundamental realignment in policy and regulation is needed at the state level to fix the system, one that ensures that individual programs can achieve their goals while protecting natural hydrologic processes and associated habitats within Puget Sound watersheds.

A.3.1 *Implement and update stream flow protection and enhancement programs.*

A.3.1.1 Ensure instream flows are protected by rule in each Puget Sound watershed and ensure instream flow rules are based on the most complete and current science pertaining to hydrologic processes

Include O_2 levels, H_2O temperature & heat island effects.

A.3.1.2 Develop coordinated watershed-based water management strategies, accounting for existing ecosystem goals, water management agreements, and projections of future instream flow demands.

A.3.1.3 Implement the existing watershed management plans, including water resource plans under the state Watershed Planning Act (HB2514), consistent with the Action Agenda and coordinated with other local protection and restoration efforts including salmon recovery.

A.3.2 *Reform state water laws to be more protective of instream flows and encourage conservation.*

A.3.2.1 Discourage waste of water resources and protect instream flows by addressing water laws that deter conservation and efficiency.

A.3.2.2 Use pricing structures to discourage inefficient and unnecessary use of municipal water, particularly in flow limited areas or low flow periods.

A.3.2.3 Evaluate and implement solutions to water use issues related to exempt wells.

A.3.2.4 Improve compliance with existing water laws.

find way to change from fixed drainage hook up fees to reflect reduced drainage volumes resulting from water conservation and reuse measures.

A.3.3 *Expand opportunities to reuse, reclaim, and recycle water resources.*

A.3.3.1 Establish rules or standards which promote the use and reuse of recycled water.

A.3.3.2 Identify and address barriers to improve use and reuse of rainwater, graywater, stormwater, and wastewater.

A.3.3.3 Promoted use and treatment of water resources as close to the source as possible.

Ditto for wastewater reclamation. reduce wastewater hookup fee. i.e. make variable based on conservation and reuse.

A.3 **Near-term Actions**

1. Complete setting flow rules in watersheds that currently do not have instream flow rules, with priority given to critical basins or those with known significant problems meeting instream or out-of-stream demands.
2. Begin to update instream flow rules to ensure they are based on current science. Focus this work initially in basins with flow rules that were set before 1986 and for water limited basins.
3. Develop and implement the comprehensive basin flow protection and enhancement programs called for in the Puget Sound Chinook Recovery Plan.
4. Implement the recommendations from approved water quantity plans under the Watershed Planning Act (HB 2514) consistent with the action agenda and coordinated with other local restoration and protection efforts.
5. Evaluate and implement solutions to exempt wells issues. Start by convening a stakeholder group to identify management options and make a recommendation to the Partnership and Department of Ecology.
6. Establish local water masters to increase water code compliance and enforcement. Provide funding for water masters to be local contact to water users, provide a local

11-20-2008 06:08pm From- T-259 P.007/018 F-380

compliance presence, protect the resource, reduce water use, and protect senior water rights, including instream flows.

7. Support municipal water systems implementation of Washington Department of Health's Water Use Efficiency Rule, including establishing water conservation goals, metering, and reporting from all municipal suppliers.

8. Develop a graywater reuse rule by December 31, 2010.

A.4 **Support long-term protection and stewardship of working farms, forests, and aquatic lands to help maintain ecosystem functions, sustained quality of life, and improved viability of rural communities.**

There are numerous voluntary incentive and stewardship programs available to rural property owners in Washington State. Landowner incentive programs include direct financial incentives (e.g., grants, subsidized loans, cost-shares, leases); indirect financial incentives (e.g., property or sales tax relief); technical assistance (e.g., referrals, education, training, design assistance programs); and recognition and certification of products and operations. Current use and effectiveness of voluntary incentive and stewardship programs vary; program management costs to government can be prohibitive, the most willing property owner participants may not be situated in highest priority areas, and these programs do not guarantee long term protection given the voluntary nature of participation.

A.4.1 *Use, coordinate, expand and promote financial incentives that allow working lands to stay viable.* These include, but are not limited to, purchase of development rights and conservation easements, transfer of development rights, and property tax incentives such as the Public Benefit Rating System.

A.4.2 *Use, coordinate, expand and promote existing landowner stewardship programs to help protect high value land and water resources.*

A.4.2.1 Focus stewardship programs on Action Agenda priorities and incorporate the watershed characterization results to refine geographic areas and problems to address.

A.4.2.2 Expand rural participation rates in voluntary site stewardship programs.

A.4.3 *Support economically viable farms and agriculture that are protective of watershed health and reduce land conversion.*

A.4.3.1 Expand programs that support the economic viability of farms in Puget Sound. This could include expanding cooperative marketing programs such as Puget Sound Fresh to bring locally-grown food to Puget Sound markets; amending GMA to authorize farm-related business activities to be conducted on designated agricultural lands; and supporting the State Farmland Legacy Program, and related activities and groups working to preserve Puget Sound farmland (e.g., Future of Agriculture Initiative and Skagitonians to Preserve Farmland)

Encourage organic farming

A.4.3.2 Use incentive programs to encourage farmers and landowners with hobby farms in rural areas to engage in sustainable farming practices.

A.4.3.3 When conducting land use and conservation planning, including watershed assessments, engage the farming communities as important stakeholders.

A.4.4 *Promote economically viable working forests that are protective of watershed health and reduce forest conversion.*

A.4.4.1 Maintain publicly owned and industrial forest production while achieving ecosystem goals and consistent with the Action Agenda.

A.4.4.2 Support small working forests through non-regulatory incentive and technical assistance programs.

A.4.4.3 When conducting land use and conservation planning, including watershed assessments, engage large and small forest landowners as important stakeholders.

A.4.5 *Promote working aquatic lands that are protective of ecosystem health to provide abundant shellfish for commercial, subsistence, and recreational harvest.*

A.4.5.1 Implement best management practices for shellfish production.

A.4.5.2 Resolve conflicts between aquaculture and upland uses, particularly in South Sound. Continue the work of the Shellfish Advisory Committee.

A.4.5.3 Implement actions from Washington Department of Natural Resources Aquatic Habitat Conservation Plan (HCP) that protect critical habitat.

A.4 Near-term Actions

1. Purchase development rights or use conversation easements for working lands at immediate risk of conversion.
2. Coordinate with the SSB 5248 project by the Ruckelshaus Center that is working to resolve conflicts between agricultural activities and critical areas regulations.
3. Support the Conservation Commission's efforts to protect productive agricultural areas consistent with the Action Agenda priorities.
4. Continue to implement existing forest practice plans and regulations consistent with the Action Agenda including the state trust lands Habitat Conservation Plan, state forest practices rules, and Road Maintenance and Abandonment Plans as informed by the Forest and Fish Plan, and others.
5. Continue ongoing work to resolve conflicts between aquaculture and upland uses.
6. Implement components of the Washington Department of Natural Resource Aquatic Habitat Conservation Plan (HCP) that protect critical habitat.

reduce monoculture plant farms encourage habitat developing diverse plantings

A.5 Prevent and rapidly respond to the introduction of new invasive species.

Invasive, non-native species are brought to the Puget Sound through many ways such as imported fruits, plants/vegetables; ballast water discharge from ships; imported soil; and

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commercial/recreational boat hulls. In Puget Sound, invasive species can alter native species and habitats in a variety of ways, including but not limited to competing with or feeding on native species, reducing the resiliency of ecosystems, changing local habitats, affecting flood patterns, and introducing diseases. Preventing the introduction of new invasive species is more effective than trying to reduce and remove them later.

A.5.1 *Implement key recommendations for the Puget Sound region that will prevent the introduction of new invasive species as identified in the Invasive Species Council "Invaders at the Gate" Strategic Plan.*

A.5.2 *Reduce potential risks from ballast water.*

A.5 Near-term Actions

1. Advocate for national or west coast regional ballast water discharge standards.
2. Implement the Department of Fish and Wildlife ballast water regulatory compliance monitoring program.
3. Develop a Puget Sound baseline and database of invasive species to guide control efforts.

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Priority C: Reduce the Sources of Water Pollution

Current situation: Pollution of the rivers, creeks, bays, and open waters of Puget Sound comes from a variety of sources and travels along many pathways. Treated municipal sewage, spilled fuel, deposition of air pollution, legacy toxic pollutants, disease-bearing organisms from septic systems and harmful algal blooms, fertilizers, erosion, and the runoff from roads and parking lots all find their way into the waters of Puget Sound, where they harm fish and wildlife and create direct health risks to people. Polluted waters reduce ecosystem services -- pollution results in shellfish closures, beach closures, impacts to recreation, loss of cultural resources, consumption warnings for fish, and low oxygen conditions that kill marine species. Increasing amounts of people, cars, and pavement mean more pollutants entering the waterways in higher concentrations at a faster rate.

Even as we clean up old contaminated sites, we allow new pollutants such as synthetic hormones to enter the water, many of which we know very little about or have few standards and testing methods to evaluate. Although progress has occurred at individual locations, other sites have worsened and grappling with the multiple problems of water quality at a regional level has been difficult. Past water quality programs have often emphasized expensive clean up programs without adequate emphasis on reducing new pollution. Many new and emerging pollutants are not well understood. Current water quality management practices in Puget Sound do not reflect an ecosystem approach, are not well coordinated, and do not effectively address the ubiquitous nature of pollutants in our freshwater and marine systems.

Rationale for action: Improving ground and surface water quality in Puget Sound will require a regional commitment to reducing the multiple sources of water pollution prior to their entry into the system. Implementing the clean up of contaminated sites still must occur, with priorities and appropriate sequencing, and the nutrients and disease-bearing organisms from human and animal waste must be prevented from degrading Puget Sound streams and saltwater.

The Action Agenda identifies a coordinated regional approach to reducing the sources of water pollution in Puget Sound that reflects six primary objectives:

- *Prevent pollutants from being introduced into Puget Sound ecosystems.*
- *Use a comprehensive and integrated approach to managing urban stormwater and rural surface water runoff.*
- *Manage and prioritize upgrades to wastewater treatment plants.*
- *Establish and maintain locally coordinated, effective on-site sewage system management to reduce pollutant loading to vulnerable surface waters.*
- *Prioritize and implement projects to clean up toxic contamination in water and upland areas.*
- *Continue monitoring programs which reduce human exposure to health hazards in marine, nearshore, and estuarine environments.*

Improving strategies and actions over time: The strategies and actions identified below will need to be refined over time. The Biennial Science Workplan identifies several areas of study to help refine protection strategies, including a watershed-scale study of stormwater management strategies on pollutant loads. The Action Agenda identifies stormwater runoff as a major way

pollutants are washed into fresh and marine waters. The watershed study will provide better understanding of what makes a particular stormwater discharge likely to cause harm, whether and how well retrofits reverse past harms, what combinations of management techniques are effective at minimizing harm, and what types of findings are most transferrable to other locations.

C.1 Prevent pollutants from being introduced into the Puget Sound ecosystem to decrease the loadings from toxics, nutrients, and pathogens.

The most reliable and cost effective way to manage for water quality health is to target the sources of contaminants, prior to their entry into Puget Sound's surface and groundwater system. Source control tactics include education, pollution prevention, innovative technologies, open space protection, low impact development, natural infrastructure, and engineered solutions.

C.1.1 *Implement a prioritized, comprehensive management program to reduce loadings of toxics into Puget Sound.*

C.1.1.1 Conduct public outreach focused on reduction of pollutants and pharmaceuticals. As a first step, focus on pollutants identified in the Phases I and II of the regional toxic loading study that are priority threats to Puget Sound.

C.1.1.2 Advocate national standards for new and emerging contaminants.

C.1.1.3 Advocate strategies including chemical substitutions, cradle to grave management of products with hazardous materials and chemicals, and the reduction and reuse of materials where possible.

C.1.1.4 Accelerate reduction of the loading of Persistent Bioaccumulative Toxic chemicals to Puget Sound.

C.1.1.5 Continue to invest in technologies that reduce toxic pollutants.

Develop pricing mechanism to charge suppliers for adverse externalities I.E. charge producers - the true-cost. including disposal & cleanup - and administrative costs.

C.1.2 *Implement targeted air emission and source control programs for land-based vehicles, marine vessels, and air transportation.*

C.1.2.1 Expand oil spill prevention and interagency spill response programs. Consider and integrate as appropriate the recommendations of the Oil Spill Advisory Council into the overall pollution reduction strategy. Permanently maintain a year-round rescue tug at Neah Bay in support of enhanced emergency response capabilities.

C.1.2.2 Promote efforts that reduce the number of vehicles on the road to reduce pollutants entering Puget Sound from roads and parking lots. — charge "drainage" fees to cars too rather than just by parcels. — charge for public road right of way drainage MGT.

C.1.2.3 Establish No Discharge Zones for all or parts of Puget Sound that are nutrient-limited, have high vessel use, and are significant for shellfish production. Establishing No Discharge Zones will require pump-out facilities with maintenance programs prior to implementation of the new rules.

C.1.2.4 Implement existing air quality management plans to decrease risks to human health and reduce pollution, as part of the overall pollution reduction strategy.

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C.1.3 *Develop and implement water quality clean up and management plans to reduce pollutant loads.* In the near-term, implement existing Water Quality Management Plans (TDML), Shellfish Protection District, and other water quality plans. In the long term, implement comprehensive watershed-based and regionally coordinated approaches to controlling and treating pollutants that is integrated with other strategies to protect and restore Puget Sound.

C.1 **Near-term Actions**

1. Conduct a focused outreach campaign to reduce pollutants identified in the Phase II of the toxic loading study that are priority threats to Puget Sound. This effort would likely be focused on pharmaceuticals and pollutants in stormwater runoff and include a pharmaceutical take-back program.
2. Implement Department of Ecology's Persistent Bioaccumulative Toxins (PBT) program to reduce and eventually eliminate the use of all chemicals on the PBT list.
3. Permanently fund a rescue tug at Neah Bay. Advocate for a permanent federal funding mechanism for an emergency response rescue tug at Neah Bay. If federal legislation is not passed, seek and support one year funding for FY 2010 and pursue a dedicated state funding option.
4. Obtain enhanced delegated authority from the Coast Guard to the Department of Ecology to inspect vessels, investigate incidents, and approve oil spill prevention plans for vessels and facilities.
5. Petition EPA to establish Puget Sound as a No Discharge Zone to eliminate bacteria, nutrients and pathogens from being discharged into Puget Sound. Prioritize areas of the Sound that are nutrient limited, have high vessel use, are significant for shellfish production and/or that are otherwise especially vulnerable for phase in of the No Discharge Zone.
6. Implement existing air management plans consistent with the Action Agenda.
7. Implement Shellfish Protection District plans, Marine Managed Area plans, and related projects to restore water quality at commercial and recreational shellfish areas that are degraded or threatened.
8. Implement immediate remediation actions to address Hood Canal's low dissolved oxygen concentrations through the Hood Canal Dissolved Oxygen Program.
9. Implement priority strategies and actions to address low dissolved oxygen in South Sound, targeted areas in the Whidbey Basin, and other vulnerable areas.

C.2 **Use a comprehensive, integrated approach to managing urban stormwater and rural surface water runoff to reduce stormwater volumes and pollutant loadings.**

Surface water and stormwater runoff in urban and rural areas are primary transporters of contaminants to surface and groundwater resources throughout the Puget Sound basin. Strategic elements of a comprehensive approach to reducing surface and stormwater volumes and pollutant loadings include managing surface water closer to its source and when possible, protecting and restoring the natural processes related to flow and filtration.

C.2.1 *Integrate efforts to manage stormwater discharges with work to protect land cover and reduce pollutants at the watershed scale and across Puget Sound.* This means

implementing the land use protection actions described in Priorities A and D, as well as loadings reduction in C.1.

C.2.1.1 Investigate, and if appropriate and feasible, establish watershed-scale stormwater permits through Section 208 of the Clean Water Act. Focus permits on the multitude of discharges that occur in logical geographic areas, rather than discharge-specific inputs or jurisdictional boundaries.

yes!

C.2.1.2 Establish priorities and resource needs for creating a coordinated water quality monitoring program under National Pollutant Discharge Elimination System (NPDES).

C.2.2 *Manage stormwater runoff in urban and urbanizing areas to reduce stormwater related impacts.*

C.2.2.1 Implement the municipal stormwater NPDES Phase I and II permits, so that water quality standards are met. Provide financial and technical assistance to permitted cities and counties.

C.2.2.2 Improve stormwater management in communities not currently covered by NPDES permits by providing financial and technical assistance to local governments to create local comprehensive stormwater control programs. Investigate expansion of NPDES permit coverage to include jurisdictions with municipal separated storm sewer systems (MS4) that currently fall under the thresholds used by the NPDES and 303(d) process. Initiate work in areas with documented stormwater-related problems and intact resources that are threatened by surface runoff.

C.2.2.3 Assist cities and counties in adopting low impact development (LID) stormwater codes for development and redevelopment. Provide standards for low impact development and establish criteria to determine where LID is feasible.

C.2.2.4 Advance the use of low impact development approaches to stormwater management. This includes, but is not limited to: a) resolve institutional barriers which limit use of low impact development for road construction and stormwater flow control projects; b) implement, assess, and promote successful examples of low impact development techniques; c) develop incentives for using low impact development; d) develop focused training for contractors and developers; and e) develop focused training for local government staff on areas best suited for low development impact and assist them in revising their regulations to allow low impact development.

a) Provide research guidance and help fund academic research for LID techniques

b) Provide certification programs for materials and installers such as ~~porous~~ permeable pavement.

c) Coordinate with national technical & professional committees on LID techniques

d) help develop training programs through colleges & trade schools to help increase the level of awareness & proficiency of the ~~[illegible]~~ work force.

e) tie with green jobs [above]

f) work to help define LID to the MEF through courts and/or technical

C.2.2.5 Evaluate the technical and programmatic solutions for Combined Sewer Overflows (CSOs) in the context of improving water quality in fresh and marine water and preserving and recovering the health of Puget Sound.

C.2.2.6 Prioritize and implement stormwater retrofits in urban areas. In the near term, develop high level prioritization criteria for the selection of new projects. Over the long-term, link retrofit priorities to coordinated watershed clean up and prevention strategies.

C.2.3 *Manage surface water run-off in rural areas and on working resource lands to reduce pollutant loadings.*

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C.2.3.1 Implement existing road maintenance and abandonment plans on public and privately held working forests.

C.2.3.2 Fund and implement voluntary incentive, stewardship and technical assistance programs for rural unincorporated landowners, hobby farms, working farms, and nurseries.

C.2 **Near-term Actions**

1. Establish a regional coordinated monitoring program for stormwater, working with the Monitoring Consortium of the Stormwater Work Group (see E.3).
2. Provide financial and technical assistance to cities and counties to implement NPDES Phase I and II permits.
3. Assist cities and counties in adopting low impact development stormwater codes for development and redevelopment.
4. Develop and implement low impact development incentives. Work with regional experts to develop and implement incentives and remove barriers to the use of low impact stormwater management techniques on development projects.
5. Convene a focus group to evaluate the technical and programmatic solutions for CSOs in the context of improving water quality in fresh and marine water. The integration of CSO solutions into the larger range of solutions to stormwater and other water quality problems may improve the cost effectiveness of both programs in urban areas, notably Seattle and King County. This will require flexibility in implementation, timing, and scope of municipal wastewater NPDES program as applied to CSOs.
6. Develop high-level criteria that can be applied in 2009 to determine the highest priority areas around the Sound for stormwater retrofits. Implement projects based upon these criteria to bring areas into compliance with current stormwater regulations, including low impact stormwater management techniques. Monitor effectiveness of the techniques.
7. Implement road maintenance and abandonment programs for federal and state owned lands (including trustlands) as well as private timber lands.
8. Implement private property stewardship, incentive, and technical assistance programs (e.g. Conservation Districts, WSU Extension, local government programs) that focus on reducing sources of water pollution, particularly in priority areas.

BMPS & help install through technical and/or financial assistance

C.3 **Prioritize and complete upgrades to wastewater treatment facilities to reduce pollutant loading.**

Wastewater is a source of a broad spectrum of pollutants, including nutrients and pathogens, to Puget Sound. Wastewater treatment removes or transforms many but not all contaminants, and treated municipal sewage contains a mixture of personal care products, caffeine, endocrine-mimicking chemicals and other pharmaceuticals. Land based wastewater treatment plants discharge an estimated 400 million gallons per day of treated water into Puget Sound. Combined sewer outflows sometimes discharge mixed stormwater and untreated wastewater to Puget Sound during wet weather when conveyance or plant capacities are exceeded.

Technical approaches to wastewater treatment vary depending upon the type of waste and age of the facility. Municipal, onsite and combined sewer overflow treatment facilities primarily focus on removing pathogens, biochemical oxygen demand, and suspended solids with a primary objective of protecting human health. Industrial facilities typically have systems customized to their waste products and sometimes discharge to municipal systems following pre-treatment. Many wastewater treatment plants are outdated and lack advanced treatment technology.

Discuss of pricing to offset ~~the~~ Brightwater goal of paying bonds at expense of innovative wastewater management I.E. encourage price reductions to standards fees when customer provides exemption wastewater and/or formula

C.3.1 *Implement priority upgrades of wastewater facilities in urban and urbanizing areas to increase effectiveness of treatment, especially in nutrient sensitive areas of Puget Sound.*

C.3.1.1 Investigate requiring nitrogen removal at treatment plants in targeted areas including those with nutrient loading issues and vulnerable waters.

C.3.2 *Improve local government project readiness by providing technical assistance to local governments with wastewater treatment plants scheduled to be upgraded in the next five to ten years or in locations where significant nutrient loading originates.* Priority will be given to projects that reduce pollutant loadings (nutrients, toxics, and pathogens) and that develop alternative water supplies by reclaiming and reusing municipal wastewater.

C.3.3 *Require federal facilities to reduce nutrient and pathogen loading consistent with the Action Agenda priorities.*

C.3.4 *Continue to investigate and invest in technologies that reduce nutrients, pathogens and emerging chemicals.*

C.3 **Near-term Actions**

1. Ensure that AKART (All Known and Reasonable Technology) or better standards are met in nutrient sensitive areas such as Hood Canal, South Sound, and the Whidbey Basin.
2. Provide funding and technical assistance to local governments, particularly in nutrient sensitive areas, to initiate projects to upgrade wastewater treatment facilities.
3. Support federal facilities in reducing nutrient and pathogens, particularly in already impaired areas.

C.4 **Establish and maintain locally coordinated, effective on-site sewage system management to reduce pollutant loading to vulnerable surface waters.**

Rural communities in Puget Sound lack municipal wastewater treatment facilities and residents typically use on-site wastewater treatment techniques for sewage treatment. There are an estimated 500,000 on-site septic systems in the Puget Sound basin, many located adjacent to vulnerable water bodies. Failing septic systems threaten water quality and public health. Well designed, sited, and constructed on-site septic systems are effective in removing pathogens and indicator bacteria from wastewater, though they are less effective in removing nitrogen and other nutrients.

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C.4.1 *Establish, in each county, a coordinated way to systematically identify and replace failing or poorly functioning septic and on-site treatment systems, as well as address long term maintenance needs for these systems.*

C.4.1.1 Implement on site septic plans in Marine Managed Areas, per 3SHB 1458 (On-site Sewage Disposal System 2006).

C.4.1.2 Investigate the contribution of on-site septic systems to pollutant loadings in freshwater environments.

C.4.1.3 Establish septic utilities to ensure that existing septic systems and large onsite septic systems are well maintained, and increase capacity of local health jurisdictions to implement on-site septic management plans. This effort should focus first on South Sound, Hood Canal, and other areas prone to increasing levels of hypoxia and in shellfish threatened areas. Encourage community systems in areas of high residential density and promote nitrogen-reducing technology where feasible.

C.4.2 *Review and, as appropriate, approve new septic system treatment technologies for use in Washington State.*

C.4.3 *Provide innovative cost-share and loan programs for homeowners.*

C.4 Near-term Actions

1. Develop and implement septic system management plans in each Puget Sound county.
2. Revise the current septic system rule no later than December 2010 so that standards are established to address new septic system technologies. Review technologies and address operation and maintenance issues.
3. Enhance and target septic loan programs to ensure that programs are targeted to areas with demonstrated loading issues and vulnerable waters. Leverage public and private funds to increase the scope of loan programs.

Increase Jurisdictional enforcement & financial partnering opportunities

C.5 Prioritize and continue to implement toxic clean up programs for contaminated waterways and sediments.

Remediation and clean up of contaminated waterways and sediments, which exceed state and federal regulatory thresholds, typically involves groundwater, sediment in deltas, estuaries and depositional zones, and freshwater lakes. Remediation is costly and requires extensive coordination among many stakeholders. Most clean up actions target sediments containing a number of legacy contaminants such as DDT and PCBs that impact water quality and can bioaccumulate in aquatic organisms. There are 115 contaminated marine sediment sites in Puget Sound, many of which are currently undergoing active clean up. The water quality management strategy for Puget Sound reflects a continued commitment to completing remediation projects in conjunction with expanded source control programs to prevent future contaminants from entering the system.

C.5.1 *Prioritize and sequence Puget Sound clean up and remediation projects to reduce the loadings to the system, as informed by the Toxics Loading Study, Urban Bay, and other studies.*

C.5.2 *Accelerate priority clean up projects.* In the near term, continue to implement current high priority remediation and clean up projects. In the long term, implement those projects which meet prioritization and sequencing criteria.

C.5 **Near-term Actions**

1. Continue to implement ongoing high priority remediation and clean up projects.
2. Refine the Washington State Department of Ecology near-term prioritization criteria for site clean ups to be consistent with the Action Agenda and incorporate criteria into toxic clean up grant programs. Criteria should include, but not be limited to, vulnerability of receiving waters, contribution of the site to overall water pollution and public health, and potential for recontamination.

C.6 **Continue to monitor swimming beaches as well as conduct shellfish and fish advisory programs to reduce human exposure to health hazards.**

People and other species encounter a variety of air, soil, and water-based pollutants throughout Puget Sound. If certain thresholds and other conditions are met, individuals may become ill, infected, or diseased. The consumption of fish, shellfish, sea plants, and other marine biota represent the most significant exposure risk to human health from toxic contaminants, pathogens, and biotoxins related to Puget Sound. Washington State Department of Heath and Department of Ecology monitoring programs assist in identifying sources of pollutants, conduct water quality monitoring, assess the safety of beaches for recreational shellfish harvesting, and certify the safety of commercial shellfish operations. Monitoring information assists with making decisions about swimming beach closures, shellfish beach closures and fish advisories.

C.6.1 *Monitor harmful algae blooms and other conditions that can be harmful to human health.*

C.6.2 *Continue to inform the public about conditions and closures including fish advisories, swimming beach, and shellfish beach closures.*

Gorilla Mktg
Connect to causes & & programs for improvement at citizen & jurisdiction level.

C.6 **Near-term Actions**

1. Fund the swimming beach monitoring program.
2. Fund the shellfish and fish advisory monitoring programs.

11-20-2008 05:10pm From- T-258 P.018/018 F-380

From: Ethan Y Lucas

Comment: Hello,

Please use the following:

1. The Agenda needs to include: stronger pollution prevention plans for toxic chemicals; comprehensive stormwater cleanup programs for cities, industries, construction sites and roadways; and a full 12 year plan with sustained funding and well defined benchmarks to measure progress.

From: Jeremy Lucas

Comment: Dear Puget Sound Partnership,

Thank you for your hard work to develop a draft Action Agenda to restore, protect and recover Puget Sound to health by 2020. It could not come at a more pressing time, especially for the Sound's iconic and endangered orca whale. Just this month, researchers reported seven orcas "10% of the Puget Sound population" are missing and believed to be dead. Some experts say dwindling populations of endangered Chinook salmon are at least partly to blame. Is this a sign that our ecosystem is on the verge of collapsing?

The urgency of restoring the Sound to health is at a tipping point and missing orcas are the Sound's "canaries in the coal mine," telling us we are running out of time. But there is hope for the orca, as there was hope for the bald eagle, the California Condor and others on the verge of extinction. The Puget Sound Partnership's Action Agenda is a golden opportunity to do what has not been done for over 20 years- develop and implement a recovery plan that is accountable, effective, transparent and decisive with sustained funding to restore this national treasure to health by 2020.

The draft Action Agenda includes many of the essential elements that need to be done:

-Require low-impact development to reduce stormwater pollution;

-Prohibit new bulkheads near feeder bluffs and forage fish spawning beaches;

-Fund local governments to develop and carry out shoreline master programs;

-Fund enforcement staff at state agencies and local governments;

-Implement specific, aggressive cleanup plans for polluted waters, including TMDLs;

-Fully fund a permanent year-round rescue tug at Neah Bay for oil spill prevention;

-Acquire critical intact parcels for habitat protection and conservation;

-Set strong requirements for water quantity, such as setting in-stream flow for all major rivers.

BUT, more than a list of Soundwide and Action Area-specific actions, the Partnership must create a real 2020 Action Agenda, not just a 2-year plan, that clearly identifies the specific actions that are needed over the next 12 years and the HOW and WHO and BY WHEN each action must be

completed. All the actions need to be tied together into a comprehensive plan with measurable benchmarks and timelines in order to achieve recovery by 2020. The final Action Agenda must:

-Clearly identify timelines and responsibilities;

-Identify adequate and sustained funding for the long haul;

-Be a visionary and long term plan;

-Be based on science;

-Offer a comprehensive and robust program to prevent all sources of stormwater pollution, not just municipal stormwater;

-Strengthen the list of actions for toxic pollution prevention;

-Set meaningful standards for habitat protection;

-Balance regulatory change with land acquisition to accomplish long term recovery goals;

-Expand the indicator species to include more than just salmon, i.e. forage fish, harbor seals, etc.

The Partnership staff, the Leadership Council, Ecosystem Coordinating Board, Science Panel and stakeholders throughout the Sound deserve praise for the monumental effort involved in producing the draft Action Agenda. The next step is secure much needed funding. The 2009 legislature must adopt new funding sources dedicated to the recovery of Puget Sound by 2020.

For Puget Sound!

From: Laura Lundgren

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For Puget Sound!

PugetSoundPartnership
our Sound, our community, our chance

From: Brian Lutenegger

Comment: Dear Puget Sound Partnership,

Thank you for your commitment to developing an Action Agenda for a healthy Puget Sound. From struggling orcas to toxic chemicals in our water, the Sound needs quick and decisive action today. I want to make sure we pass a thriving Puget Sound on to future generations.

I urge the Partnership to incorporate accountability, benchmarks of success, and ample funding into this Agenda.

The draft Action Agenda includes many of the essential elements that need to be accomplished, but in addition, the final Action Agenda must also:

Amend the Cruise Ship MOU to ban all cruise ship discharges in Puget Sound;

Prioritize the protection and restoration of the State's forage fish spawning beds;

Complete the Management Plan for the Cherry Point Aquatic Reserve;

Identify adequate and sustained funding for Plan implementation;

Update the guidance for open water dredge disposal of PCBs;

Expand the indicator species to include forage fish abundance and harbor seal toxics loading; and

Accelerate the restoration of the Elwha River.

Thank you for your hard work to develop a draft Action Agenda to restore, protect and recover Puget Sound to health by 2020.

On behalf of everything from eelgrass to orcas.

From: David Luxe

Comment: Dear Puget Sound Partnership,

I am writing to urge you to improve your action agenda's recommendations on pollution prevention. I want a healthy Puget Sound to be part of the legacy we leave our children.

Many Washington manufacturers continue to use harmful chemicals without any plans to switch to chemicals that are safer for Puget Sound. To protect public health and the environment, Washington's industry must begin phasing out of the worst toxic chemicals and developing plans to switch to safer alternatives.

Please include recommendations to help move Washington's businesses toward safer alternatives and away from chemicals known to be harmful to Puget Sound. These proposals should include Increasing the availability of technical assistance to help businesses reduce chemical use.

Developing a state program to focus on researching safer chemicals and materials.

Requiring better industry reporting to Ecology of the chemicals currently being used.

From: David Luxem

Comment: Dear Leadership Council,

Thank you for the opportunity to comment on the Puget Sound Partnership Draft Action Agenda. I appreciate the tremendous amount of work that has gone into developing it and I support the strong list of measures that, if implemented, will go a long way toward recovering Puget Sound by 2020.

The draft plan includes a few omissions. The final plan should include Outstanding Resource Water (ORW) designation under the Clean Water Act as a tool to help protect rivers and other aquatic habitat. While I strongly support the inclusion of Wild and Scenic designation as a similar tool, in some cases ORW designation will likely prove to be a better, more immediate way for the state to ensure the protection of high quality rivers and other waters. Therefore, I urge the Partnership to include support for the Outstanding Resource Water designation as one of its "Near Term Actions." ORW designations permanently protect high quality waters that are ecologically significant, provide cold water refuges for fish, and/or support important recreational values. Many rivers in the Puget Sound region are eligible for ORW designation. I would also like to encourage you to include funds to move up the removal of the two dams on the Elwha from 2012 to 2010. Removal of the Elwha dams is one of the best chances for salmon and steelhead recovery in the region as it will open up over 70 miles of prime spawning habitat. Removing these dams has also been as a key action to recover our Puget Sound's orca population, which is malnourished thanks to a lack of chinook salmon.

Especially during difficult financial times, finding opportunities for economic benefit and job creation is important. Removing the Elwha dams provides a tremendous opportunity for creating "green jobs" and numerous other economic benefits.

Thank you for taking my comments into consideration.

From: Kerry MacAndrew

Comment: Dear Puget Sound Partnership,

I am writing to urge you to improve your action agenda's recommendations on pollution prevention. I want a healthy Puget Sound to be part of the legacy we leave our children.

Many Washington manufacturers continue to use harmful chemicals without any plans to switch to chemicals that are safer for Puget Sound. To protect public health and the environment, Washington's industry must begin phasing out of the worst toxic chemicals and developing plans to switch to safer alternatives.

Please include recommendations to help move Washington's businesses toward safer alternatives and away from chemicals known to be harmful to Puget Sound. These proposals should include:

- Increasing the availability of technical assistance to help businesses reduce chemical use.

- Developing a state program to focus on researching safer chemicals and materials.

- Requiring better industry reporting to Ecology of the chemicals currently being used.

From: June MacArthur

Comment: Dear Puget Sound Partnership,

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Thank you for taking my comments into consideration.

From: June MacArthur

Comment: Dear Puget Sound Partnership,

Thank you for your hard work to develop a draft Action Agenda to restore, protect and recover Puget Sound to health by 2020. It could not come at a more pressing time, especially for the Sound's iconic

and endangered orca whale. Just this month, researchers reported seven orcas “10% of the Puget Sound population” are missing and believed to be dead. Some experts say dwindling populations of endangered Chinook salmon are at least partly to blame. Is this a sign that our ecosystem is on the verge of collapsing?

The urgency of restoring the Sound to health is at a tipping point and missing orcas are the Sound’s “canaries in the coal mine,” telling us we are running out of time. But there is hope for the orca, as there was hope for the bald eagle, the California Condor and others on the verge of extinction. The Puget Sound Partnership’s Action Agenda is a golden opportunity to do what has not been done for over 20 years- develop and implement a recovery plan that is accountable, effective, transparent and decisive with sustained funding to restore this national treasure to health by 2020.

The draft Action Agenda includes many of the essential elements that need to be done:

-Require low-impact development to reduce stormwater pollution;

-Prohibit new bulkheads near feeder bluffs and forage fish spawning beaches;

-Fund local governments to develop and carry out shoreline master programs;

-Fund enforcement staff at state agencies and local governments;

-Implement specific, aggressive cleanup plans for polluted waters, including TMDLs;

-Fully fund a permanent year-round rescue tug at Neah Bay for oil spill prevention;

-Acquire critical intact parcels for habitat protection and conservation;

-Set strong requirements for water quantity, such as setting in-stream flow for all major rivers.

BUT, more than a list of Soundwide and Action Area-specific actions, the Partnership must create a real 2020 Action Agenda, not just a 2-year plan, that clearly identifies the specific actions that are needed over the next 12 years and the HOW and WHO and BY WHEN each action must be completed. All the actions need to be tied together into a comprehensive plan with measurable benchmarks and timelines in order to achieve recovery by 2020. The final Action Agenda must:

-Clearly identify timelines and responsibilities;

-Identify adequate and sustained funding for the long haul;

-Be a visionary and long term plan;

-Be based on science;

-Offer a comprehensive and robust program to prevent all sources of stormwater pollution, not just municipal stormwater;

-Strengthen the list of actions for toxic pollution prevention;

-Set meaningful standards for habitat protection;

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-Balance regulatory change with land acquisition to accomplish long term recovery goals;

-Expand the indicator species to include more than just salmon, i.e. forage fish, harbor seals, etc.

The Partnership staff, the Leadership Council, Ecosystem Coordinating Board, Science Panel and stakeholders throughout the Sound deserve praise for the monumental effort involved in producing the draft Action Agenda. The next step is secure much needed funding. The 2009 legislature must adopt new funding sources dedicated to the recovery of Puget Sound by 2020.

For Puget Sound!

From: Joyce Major

Comment: Dear Puget Sound Partnership,

I kayak every year in the sound to see the Orcas. It is our duty to protect their habitat as we do our own homes. Please help the Sound. The Partnership staff, the Leadership Council, Ecosystem Coordinating Board, Science Panel and stakeholders throughout the Sound deserve praise for the monumental effort involved in producing the draft Action Agenda. The next step is to finalize a plan that is accountable, transparent, effective and have dedicated new funding sources to the recovery of Puget Sound by 2020.

The Partnership must create a real 2020 Action Agenda, not just a 2-year plan that clearly identifies the specific actions that are needed over the next 12 years and the HOW and WHO and BY WHEN each action must be completed. All the actions need to be tied together into a comprehensive whole through measurable benchmarks that must be accomplished in order to achieve recovery by 2020.

Thank you for this opportunity to strengthen a strategy to save Puget Sound.

From: Jimmy Malecki

Comment: Dear Puget Sound Partnership,

Thank you for your commitment to developing an Action Agenda for a healthy Puget Sound. From struggling orcas to toxic chemicals in our water, the Sound needs quick and decisive action today. I want to make sure we pass a thriving Puget Sound on to future generations.

I urge the Partnership to incorporate accountability, benchmarks of success, and ample funding into this Agenda.

The draft Action Agenda includes many of the essential elements that need to be accomplished, but in addition, the final Action Agenda must also:

-Amend the Cruise Ship MOU to ban all cruise ship discharges in Puget Sound;

-Prioritize the protection and restoration of the State's forage fish spawning beds;

-Complete the Management Plan for the Cherry Point Aquatic Reserve;

-Identify adequate and sustained funding for Plan implementation;

-Update the guidance for open water dredge disposal of PCBs;

-Expand the indicator species to include forage fish abundance and harbor seal toxics loading; and

-Accelerate the restoration of the Elwha River.

Thank you for your hard work to develop a draft Action Agenda to restore, protect and recover Puget Sound to health by 2020.

On behalf of everything from eelgrass to orcas.

From: Linda Mallin

Comment: Dear Puget Sound Partnership,

The Partnership staff, the Leadership Council, Ecosystem Coordinating Board, Science Panel and stakeholders throughout the Sound deserve praise for the monumental effort involved in producing the draft Action Agenda. The next step is to finalize a plan that is accountable, transparent, effective and have dedicated new funding sources to the recovery of Puget Sound by 2020.

The Partnership must create a real 2020 Action Agenda, not just a 2-year plan that clearly identifies the specific actions that are needed over the next 12 years and the HOW and WHO and BY WHEN each action must be completed. All the actions need to be tied together into a comprehensive whole through measurable benchmarks that must be accomplished in order to achieve recovery by 2020.

Thank you for this opportunity to strengthen a strategy to save Puget Sound.

From: Angela Manning

Comment: Dear Puget Sound Partnership,

Thank you for tackling the enormous challenge of saving Puget Sound head on. We appreciate your boldness and your efforts to engage the broader community, to listen to us and to base your decisions on science.

Surfrider Foundation is committed to supporting your efforts, primarily by encouraging people to get out in the watershed and into the Sound, to enjoy it, to appreciate it and to take action to protect and restore it. Through projects like Rise Above Plastics, beach clean ups and ocean friendly gardens, we will do our best to promote Sound stewardship practices.

In order to make sure that we reach our goal of a healthy Puget Sound by 2020, we ask that you strengthen the Action Agenda by incorporating the following recommendations:

- Be stronger on water quality measures by offering a comprehensive and robust program to prevent all sources of stormwater pollution and strengthening the list of actions for toxic pollution prevention.

- Develop different indicators for human well-being to include more opportunity for quality water-based

recreation through increased shoreline access, clean beaches, and clean water.

- Be stronger on accountability by incorporating clear benchmarks to get us to a healthy Puget Sound by 2020.

- Create more opportunities and stronger protection programs to improve the public's interaction with the shoreline and achieve enough water quality improvement and habitat restoration to inspire the public to go to the water's edge more frequently.

- Ensure that there is enough funding for Puget Sound to achieve the goals laid out in this ambitious agenda.

Thank you for your hard work to develop a draft Action Agenda to restore, protect and recover Puget Sound to health by 2020.

From: Margaret Manning

Comment: English! "Percent exceedance of instream flows"?? Break pads??

From: Kristine Mansfield

Comment: I believe one of the biggest threats to our precious Puget Sound is the unregulated Shellfish industry. Commercial aquaculture (especially Geoduck aquaculture) is destroying our tidelands and if not stopped we may never be able to repair and restore the damage that has been done. Puget Sound cleanup has to deal with what is being dumped in to the Puget Sound but also what is actually happening on the beaches of our Puget Sound. Citizens are doing their part to help clean up the Sound and its about time industry does the same. Forage fish areas are being destroyed all over the Sound and we know our salmon and other species depend on this for survival. Our native habitat is being replaced all over the Puget Sound with this aquaculture for profit. The Shellfish industry is clearly an industry that has been allowed to set its own rules in our state. It's time to change and I believe it will! Puget Sound Partnership is on the right track but I am hoping that millions or o ur dollars aren't being spent just to help the Shellfish industry continue to do business as usual. Thank you for listening.

From: Robbie Mantooth

Comment: Outstanding work. Thank you. My comments represent only my views, but come out of a background of volunteer work with WRIA 18, North Olympic Land Trust, Friends of Ennis Creek, Port Angeles Business Association's Waterfront Committee, Olympic Park Institute Board and numerous other environmental activities. I want to be sure the Action Agenda gives appropriate significance to smaller streams that can add up to produce a significant number of fish and can either be a source of clean or polluting water entering Puget Sound. My particular passion is for restoration and protection of Ennis Creek, which flows from snow fields in Olympic National Park and enters the Strait from the former Rayonier millsite -- now a major toxic cleanup site. The Lower Elwha Klallam Tribe has done extensive work on the approximately 1/2 mile of the stream that flows through our 47-acre property,

which we have permanently protected through a legal agreement with North Olympic Land Trust. These effor ts won't amount to much if the site is not cleaned to an unrestricted standard, the stream is not released from some of its armoring and its estuary, now covered with landfill, is not restored. It is good to read that a plan for Port Angeles Harbor is a priority for a pilot program, but I want to be sure that restoration and protection of Ennis Creek, rated highest among Port Angeles urban streams, will get adequate attention. The site is important to people with tribal backgrounds because of its potential productivity of the seafood that is an important part of their diets and the cultural associations with an ancient village and cemetery. Although the entire harbor is important, this site's future is of immediate concern. without adequate state regulations, it is likely to remain polluted (cleaned up only to a level that will permit restricted use), the stream will continue to be in such a narrow channel that smolt will keep being washed out to sea prematurely, the dock with thousands of creosote pilings will continue to pollute, and the fish will lack the estuarine environment they need to acclimate as they enter the saltwater and later return to spawn. The draft Action Agenda seems to give priority to Chinook salmon, but the other salmonids also are important and in need of help before they are extirpated. Steelhead are the dominant species in Ennis Creek, but so far their listing seems to have made no difference. As someone very aware of the challenges of protecting land through conservation easements, I also want to recommend lowering of the matching money requirements. The present 50% match requirement for some grants is beyond what residents of our area are likely to be able to raise. Saving just one farm may take most of the available donation budgets our citizens can provide. That would leave inadequate contributions for other nonprofits that are protecting habitat and timberlands, clean water and air.

From: Heather Mar

Comment: Dear Puget Sound Partnership,

Please improve your action agenda's recommendations on pollution prevention.

Please include provisions that will help move Washington's businesses toward safer alternatives and away from chemicals known to be harmful.

Please include increasing the availability of technical assistance to help businesses reduce chemical use.

Please include developing a state program to focus on researching safer chemicals and materials.

Please include requiring better industry reporting of the chemicals currently being used.

I am especially concerned about toxic chemicals that contaminate Puget Sound and our bodies.

Please work more to reduce toxic pollution from industry around Puget Sound!

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From: Dan Marcus

Comment: Dear PSP,

Thank you for your draft Action Agenda and for the opportunity to comment. I certainly agree with your ambitious agenda here. There are some things I would like to add.

First of all, I think there is a need to reduce or even place a moratorium on the fish take in Puget Sound, and not just for the salmon. Rockfish are very close to being listed on the ESA list from years of overfishing.

I'm also perplexed by your unwillingness to address the problem of aquaculture, and especially shellfish aquaculture. You must be aware that scientists from both the South Puget Sound Salmon Recovery Group and the South Sound Watershed profile, among others, have stated in their reports that shellfish aquaculture alters and reduces nearshore salmon habitat. You lament the loss of Orca in Puget Sound, yet you do not adequately address the loss of additional habitat for salmon, the sustenance of the Orca.

I hope you will kayak down Totten Inlet at a minus four tide so you can see for yourself what the shellfish industry has in store for all of South Puget Sound, and perhaps eventually all of Puget Sound. Geoduck aquaculture is putting a lot of economic pressure on pristine natural shorelines and estuaries that provide some of the finest intertidal fish habitat in Puget Sound.

It's disappointing that you have decided to downplay the habitat degradation and embrace the shellfish industry in spite of the documented damage they have done to salmon, herring, eelgrass and crab habitat both in Willapa Bay, and in now South Sound. It reduces your credibility significantly.

From: Lisa Marcus

Comment: Dear Puget Sound Partnership,

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I urge the Partnership to incorporate accountability, benchmarks of success, and ample funding into this Agenda.

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Thank you for your hard work to develop a draft Action Agenda to restore, protect and recover Puget Sound to health by 2020.

On behalf of everything from eelgrass to orcas.

From: Andy Maris

Comment: This study points out the obvious and has cost taxpayers 2 million dollars. I want my money back.

From: James Maroncelli

Comment: 1. The Partnership should require Ecology to change its use of mixing zones when permitting wastewater discharges. While mixing zones seem appropriate in some cases for most degradable nutrients, they should not be allowed for persistent, bioaccumulative, and toxic (PBT) chemicals like metals and PCBs.

2. According to Governor Gregoire, the correct shortening of "the Department of Ecology" is "Ecology," not "DOE." DOE mean Department of Energy.

From: James Maroncelli

Comment: When discussing the questions "What is the status of Puget Sound, and what are the biggest threats to it?" the Work Plan makes no reference to the Toxic Chemical Loading Studies that the U.S. EPA has been funding and that the Partnership has been co-sponsoring since 2006. You ought to incorporate these studies (completed and ongoing) into your Work Plan.

From: David Marsh

Comment: Thank you for your Draft Action Plan. I read the plan as part of an Environmental Science class at my local community college and it was the basis for some enlightening classroom discussion (further enforcing the part of the plan that focuses on early and continuing public education).

In particular I appreciate the wholistic approach to water quality. My view is that if any plan has a chance it is a more comprehensive and inclusive one as the one you've laid out. After having read the paper I have the following comments/questions:

1. Introduction Page 7 states that part of the plan should be to "Fix failing septic system". Many people on septic systems are lower income. I'm pleased to see that part of the plan calls for loans to help repair and update these systems. However since many of those people are lower income I would

expect they are more likely to pass on upgrading their septic particularly in this economic environment. Can the plan for updating those systems be a series of grants or direct taxation offsets like those provided to improve the efficiency of household heating, air conditioning and insulation systems?

2. Alternatively would the build out of municipal sewer systems not be a more cost effective measure, has that option been compared to the cost of individual septic system upgrades?

3. Part of the plan is to "remove barriers and break the pattern of fragmentation that prevents people and institutions from working across boundaries and disciplines to plan and implement the Action Agenda in a coordinated way". Appreciating that certain legal restrictions to some dedicated funds exist, can portions of the Federal Endangered Species act, Puget Sound Transportation Levy Funds or other related project funding be used to help with this action plan since the various species of salmon are threatened by the water quality issues?

• Air pollution, road and parking run off are a significant source of storm water pollution – if the goal is to mitigate sources as stated in the report, should we not focus on removing vehicles from the roads and parking lots in the first place?

• The continued pollution further threatens the endangered species, can the protection funds for these species not be used in further abating this pollution?

4. If "Nationwide, studies have consistently found that wetland mitigation fails roughly 50% of the time due to factors like poor site selection and lack of compliance" what is the metric for the Puget Sound region what is the realistic target for us in the next Biennium?

5. Simply put the In-Lieu-Fee-Mitigation is not mitigation at all, it is a cop out and it should not be considered part of a solution. I may well be a good bridging measure but I do not believe that allowing polluters to buy their way out of compliance as a viable long range solution.

As a citizen of the Puget Sound I appreciate this approach. I'm surprised that this sort of cohesion amongst regulatory and conservation groups to attack this issue at a regional level is now just getting started. As one of the more eco-friendly areas of the nation the Puget Sound area should proudly lead the rest of the nation in our ecological policies and programs. It is, as noted, in support of our sustaining industries of fishing, timber, tourism, etc.

From: Alex Martin

Comment: Dear Puget Sound Partnership,

I am writing to urge you to improve your action agenda's recommendations on pollution prevention.

Strong leadership is needed on this issue! Human inhabitants such as myself, along with Puget Sound's wildlife, are depending on you to halt the toxins pouring into our environment. Please strengthen pollution regulations before it is too late.

From: Jeffrey Martin

Comment: Thank you for your hard work to develop a draft Action Agenda to restore, protect and recover Puget Sound to health by 2020. It could not come at a more pressing time, especially for the Sound's iconic and endangered orca whale. Just this month, researchers reported seven orcas "10% of the Puget Sound population" are missing and believed to be dead. Some experts say dwindling populations of endangered Chinook salmon are at least partly to blame. Is this a sign that our ecosystem is on the verge of collapsing?

The urgency of restoring the Sound to health is at a tipping point and missing orcas are the Sound's "canaries in the coal mine," telling us we are running out of time. But there is hope for the orca, as there was hope for the bald eagle, the California Condor and others on the verge of extinction. The Puget Sound Partnership's Action Agenda is a golden opportunity to do what has not been done for over 20 years- develop and implement a recovery plan that is accountable, effective, transparent and decisive with sustained funding to restore this national treasure to health by 2020.

The draft Action Agenda includes many of the essential elements that need to be done:

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The Partnership staff, the Leadership Council, Ecosystem Coordinating Board, Science Panel and stakeholders throughout the Sound deserve praise for the monumental effort involved in producing the draft Action Agenda. The next step is secure much needed funding. The 2009 legislature must adopt new funding sources dedicated to the recovery of Puget Sound by 2020.

From: Melodie Martin

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From: Hayley Martin-Hampton

Comment: Dear Puget Sound Partnership,

I am writing to urge you to improve your action agenda's recommendations on pollution prevention.

From: Brice Maryman

Comment: Dear Puget Sound Partnership,

I have one word: urgency. In reading the draft action agenda, there feels like there is little sense of urgency. How can we take actions--large and small scale, discrete and systemic--tomorrow to make the Puget Sound healthy.

I'll echo what has been said by others, the Partnership must create a real 2020 Action Agenda, not just a 2-year plan that clearly identifies the specific actions that are needed over the next 12 years and the HOW and WHO and BY WHEN each action must be completed. All the actions need to be tied together into a comprehensive whole through measurable benchmarks that must be accomplished in order to achieve recovery by 2020.

From: Bernice Maslan

Comment: Dear Puget Sound Partnership,

I am writing to urge you to improve your action agenda's recommendations on pollution prevention. Please help protect the Orcas.

From: Dave Mason

Comment: It doesn't seem fair to penalize small land owners when they apply for developing their land with a seasonal stream when the County approves major projects like Emerald Downs that was built in a swamp. I see now that another large project is being started in this same area. It seems like it is a matter of who has money, tax base or pull as opposed to what is reasonable. I find it hard to believe that a little project on a couple of acres fixed with settling ponds and approved runoff plans is the big problem anymore. Widening buffer zones and reducing the size of development on my small piece won't impact the sound in any measurable fashion. There is so much industrial impact between my property and the sound that should be addressed instead of penalizing me. The only difference is that I have to move through a deep narrow canyon of controllable processes, where you can safely and easily ambush me without recourse. I always appreciate recommendations and mandates coming from non land owners about what or how I should deal with my little bit of land. Especially when it has already been zoned and taxed as R6. Big mistakes have been made in the past on an industrial size basis. Huge projects are being approved for construction to reduce traffic, or add density to the city, but let's take it out on the small developers with small projects that have little impact. I have a neighbor who is currently being victimized by all the agencies including extortion of monies for intersection improvements miles away from the location of the property. Unfortunately they are pinned down in that deep canyon with no cover. They can't go forward with out everyone's approval so they are an easy target. Why don't you focus on the big projects with major potential impacts, instead of penalizing the small projects so significantly. You take away 2-3 acres from small project for huge buffers when there is no measureable impact. I bet you wouldn't suggest removing 40-60% from the size of a larger industrial or transportation related project. Those projects are fortified and go through a different approval process.

From: Rob Masonis

Comment: Under Section D, "Conduct planning, implementation and decision-making in an integrated way and frokm an ecosystem perspective consistent with the Action Agenda," I propose two revisions. First, Near-term Action 6 should be revised to state "Implement the 2008 revision to the Pacific Salmon Treaty to ensure that the wild salmon conservation gains achieved through the treaty revisions result in more wild fish being allowed to escape for spawning." Second, the following additional near-term action should be added: "Establish mechanisms that provide for accountability and transparency within the Puget Sound Salmon Recovery Council to ensure effective integration of habitat, harvest and hatchery actions.

From: Stephen Matera

Comment: Dear Puget Sound Partnership,

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Thank you for this opportunity to strengthen a strategy to save Puget Sound.

From: Shawn McAllister

Comment: Dear Puget Sound Partnership,

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Thank you for this opportunity to strengthen a strategy to save Puget Sound.

From: David McCaughey

Comment: I very much appreciate the work that has been applied to formalize a plan for our region! The thorough stepwise fashion (bottom-up, action areas, "success", finance gap) to support decisions for initiatives will be adopted more readily by the WA public - congratulations! You have my support.

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From: Deirdre & Jay McCrary

Comment: Dear Puget Sound Partnership,

Thank you for your hard work to develop a draft Action Agenda to restore, protect and recover Puget Sound to health by 2020. It could not come at a more pressing time, especially for the Sound's iconic and endangered orca whale. Just this month, researchers reported seven orcas "10% of the Puget Sound population" are missing and believed to be dead. Some experts say dwindling populations of endangered Chinook salmon are at least partly to blame. Is this a sign that our ecosystem is on the verge of collapsing?

The urgency of restoring the Sound to health is at a tipping point and missing orcas are the Sound's "canaries in the coal mine," telling us we are running out of time. But there is hope for the orca, as there was hope for the bald eagle, the California Condor and others on the verge of extinction. The Puget Sound Partnership's Action Agenda is a golden opportunity to do what has not been done for over 20 years- develop and implement a recovery plan that is accountable, effective, transparent and decisive with sustained funding to restore this national treasure to health by 2020.

The draft Action Agenda includes many of the essential elements that need to be done:

-Require low-impact development to reduce stormwater pollution;

-Prohibit new bulkheads near feeder bluffs and forage fish spawning beaches;

-Fund local governments to develop and carry out shoreline master programs;

-Fund enforcement staff at state agencies and local governments;

-Implement specific, aggressive cleanup plans for polluted waters, including TMDLs;

-Fully fund a permanent year-round rescue tug at Neah Bay for oil spill prevention;

-Acquire critical intact parcels for habitat protection and conservation;

-Set strong requirements for water quantity, such as setting in-stream flow for all major rivers.

BUT, more than a list of Soundwide and Action Area-specific actions, the Partnership must create a real 2020 Action Agenda, not just a 2-year plan, that clearly identifies the specific actions that are needed over the next 12 years and the HOW and WHO and BY WHEN each action must be completed. All the actions need to be tied together into a comprehensive plan with measurable benchmarks and timelines in order to achieve recovery by 2020. The final Action Agenda must:

-Clearly identify timelines and responsibilities;

-Identify adequate and sustained funding for the long haul;

-Be a visionary and long term plan;

-Be based on science;

-Offer a comprehensive and robust program to prevent all sources of stormwater pollution, not just

municipal stormwater;

-Strengthen the list of actions for toxic pollution prevention;

-Set meaningful standards for habitat protection;

-Balance regulatory change with land acquisition to accomplish long term recovery goals;

-Expand the indicator species to include more than just salmon, i.e. forage fish, harbor seals, etc.

The Partnership staff, the Leadership Council, Ecosystem Coordinating Board, Science Panel and stakeholders throughout the Sound deserve praise for the monumental effort involved in producing the draft Action Agenda. The next step is secure much needed funding. The 2009 legislature must adopt new funding sources dedicated to the recovery of Puget Sound by 2020.

For Puget Sound!

From: BC Mcdonald

Comment: Dear Puget Sound Partnership,

I am writing to urge you to improve your action agendas recommendations on pollution prevention.

The risks to your profoundly beautiful and planetarily significant bioregion are indeed critical and call on your stewardship and humanity to mitigate and return to health.

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11/11/2008

From: David McDonald, 11733 22nd Ave. NE, Seattle, WA 98125, (206) 366-9676
To: Puget Sound Partnership
Re: **Comments on 11/6/08 draft Puget Sound Action Agenda**

As a resident and working biologist and environmental scientist in this region for 35 years, former construction worker, and science contributor to all the previous and current Puget Sound Authority/Action/Partnership plans, I endorse the content of the current draft. You got it right in acknowledging that most of the human impacts on the Sound come from upland land uses and activities, and also that it's time to quit reinventing the recovery plan wheel, and get to work.

The draft Action Agenda is, however, deficient in several key areas:

1) **It does not emphasize protecting and restoring upland ecosystem/hydrology/water quality functions in existing developed areas.** Just protecting intact ecosystems (if possible) won't do the job, especially in the face of population increase and climate change.
2) **It does not require pollution prevention at the source** – manufacture and sale of priority pollutants.
3) **It does not include a substantial legislative agenda.** The state legislature needs to know they have a key role in saving the Sound – good laws can prevent pollution at the source, require and fund clean technologies, and clear up regulatory and court case barriers.

Here are some specific recommendations to improve the Action Agenda:

- First, for the credibility of this Agenda and the Partnership, delete/reword statements such as page 27, first bullet, first sentence, second phrase. It is offensive and untrue to imply that the Partnership was created from thin air, rather than standing on the shoulders of the previous Authority and Action Team that had identical missions, along with all their partners over the years. Acknowledge that we've tried a coordinated approach before and come up short – we need to learn from those efforts.

Then consider these additions to address the deficiencies noted above:

- Introduction, p. 6, Soak up! par.: Add after rain gardens, "soil building with compost and mulch,". Add after native plants "and trees". Clean up! par.: Change "Herbicides" to "Pesticides (Herbicides, Insecticides etc.)" and add this sub-bullet: "Think twice before using any pesticide (weed or bug killers) – try alternatives. Search *Natural Yard Care* on the internet to learn more." [The Department of Ecology is now loading a statewide version of Seattle and King County's *Natural Yard Care* guide to its website.]
- Question 1, p. 3-4, Indicators: Integrative biological indicators like salmon runs are very useful in describing success, but not in identifying failures. This provisional indicator list should be expanded to include bottom-of-the-food-chain organisms (similar to the B-IBI used in streams), and key water quality parameters such as biological oxygen demand, nutrient loadings, and priority pollutant levels.
- Question 3, p. 5, Priority A: Add another objective:
  A.6 Protect and restore ecosystem functions in existing developed areas.

- Require low impact development stormwater management methods on every site that requires a building or other permit, all roads and infrastructure, and supporting LID retrofitting of existing facilities.
- Near-term Actions:
  - Fund, provide technical support, and enforce the LID BMPs in the DOE's 2005 *Stormwater Management Manual for Western Washington* as currently required by NPDES phase I and II permits, so that they are implemented everywhere in the region within 5 years. For existing urbanized areas, use Seattle's new Green Stormwater Infrastructure BMPs and sizing requirements on every building project , to halt degradation and start restoring urban ecosystem functions.
  - Train every jurisdiction's planning, permitting, and inspection staff to explain, implement, and enforce those LID requirements.
  - Add a requirement to the NPDES General Construction permit, similar to the Certified Erosion and Sediment Control Lead (CESCL) training requirement, that all construction managers and site/landscape subcontractors attend or test out of a practical LID implementation course (how-to's for compost-amended soils, bioretention, pervious paving, etc.). Require that all architects, landscape architects, and engineers pass a 2- day minimum continuing education course on LID design. Require every stormwater engineer or planner to demonstrate proficiency in using the new LID modeling tools in the Western Washington Hydrologic Model software, and understand how to use those methods to the maximum extent feasible on every site.

    [As a former builder, with many friends in the field, I can tell you that builders want regulatory certainty, clarity, and consistency across jurisdictional boundaries, to create a level playing field for their business, speed permitting, and prevent interruptions. We do that with practical clear laws, regulations, and enforcement across the whole region.]

- Priority C, page 20, C.1.1: Add:
  Identify priority pollutants (e.g. pesticides, soluble fertilizers, persistent bio-accumulative toxins [PBTs]) that are either unnecessary or have less toxic alternatives. Ban or severely restrict sale and use of those chemicals.
  - Near-term Actions: For instance, ban sale of cosmetic-use landscape pesticides and our Canadian neighbors have done. Ban combination pesticide/fertilizer products (e.g. weed-and-feed). Restrict sale of soluble, quick-release landscape fertilizers. Expand the state PBT list to include all chemicals that meet the definition (for instance the pesticide trifluralin); then phase out all PBTs in any use that can be released to the environment.
- Priority C, page 22, C.2.2: Add:
  <u>Require</u> LID technologies to the maximum extent feasible in all new and retrofit development and infrastructure projects of any size, in rural, suburban, and urban environments. [Many of these methods, such as compost-amended soils, bioretention swales, stormwater planters, pervious paving, and tree preservation/planting are cost effective or cost neutral now. It's time to require it everywhere and get it on the ground.]
  - Near-term Actions:
    - Fully implement the NPDES requirement that all phase I and II jurisdictions incorporate, require, and enforce the 2005 DOE stormwater manual LID BMPs

(for urban areas, use the new Seattle stormwater manual's Green Stormwater Infrastructure BMPs). Fund Ecology to provide technical support to get this into local codes in the next 2 years, and fully implemented on all building sites within 5 years.

- Prioritize and cooperatively fund urban and road infrastructure retrofit projects to use bioretention swales and other soil/plant-based BMPs to treat road runoff throughout the region. Require bioretention treatment on all new road projects – refer to the WsDOT and SDOT roadway manuals and specs.

- Priority D, page 28: Replace the duplicated 4th objective at top of this page with:
  Resolve legislative and regulatory barriers, and establish laws that support and require effective actions.
- Priority D, page 33, D.4 Reform: Add new sub-action:
  Resolve state and local regulatory barriers, establish laws that support the Action Agenda, and prepare the legislature annually to accomplish this.
    - Near-term Actions (for instance):
        - Ban/restrict unnecessary priority chemicals. [see above]
        - Require LID everywhere, always. Fund local jurisdictions to get it done.
        - Clarify in state law that local land use and stormwater codes are not "takings" requiring compensation of landowners, to remove this barrier for local governments.
        - **Prepare an annual recommended legislative work plan** and supporting information in advance of each legislative session, and advise the legislature so they can efficiently and effectively remove barriers and promote/require the actions that are likely to reverse degradation of the Sound and its tributary waters.

Thank you for listening. I look forward to seeing the final Agenda, but much more so to seeing it implemented.

David McDonald
11733 22nd Ave. NE
Seattle, WA 98125
(206) 366-9676

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From: Jim McEntire

Comment: Although I'm providing these comments as a private citizen, I am both and elected official in Clallam County (Port Commissioner), a member of the Clallam County Marine Resources Council, and a Commissioner of the Northwest Straits Commission. So I am reasonable well informed regarding the work of the Partnership.

1. There are so many discrete actions, plans, organizations mentioned that I could not really get a sense of priorities in detail. Clearly, even all the collection of things under the headings of "Near Term Actions" cannot all be undertaken at once. What is step one? Couldn't get a clear sense of that.

2. Not clearly defined even in concept is the future role of the Puget Sound Partnership itself. Is it to morph into a regional government? Will it ultimately have regulatory powers? Or will it set common, consensus standards for local governments to follow? Or will it merely be a clearinghouse and coordinating body only? Similarly, what is this "Regional Improvement District" spoken of toward the end of the document? Does one now exist anyplace in the state with taxing powers (which is clearly implied)? What powers will it have?

3. Property owners and their equities will clearly be affected by many of the programs and actions. Will there be compensation for the regulatory takings that will surely come along? This is of enormous importance for buy-in by the citizenry.

4. If the precedent is set for a raid on the MTCA account, will that destroy the political consensus surrounding the crude oil import tax that funds this account, and will this be seen as merely an augmentation of the general fund which is the funding source for much of the work that now goes on? I'm not sure I think this is a good idea.

5. What does this water quality trading system do to local economies and local governments, and who makes this market? We don't even have an carbon cap and trade system in place yet (haven't even started to define one). Think it is very premature to put this in place until we do the Western Climate Initiative and get a new economic equilibrium established first.

6. Is an in-lieu-of fee system a good, stable source of funding for mitigation projects? The current case of the highway trust fund is instructive here -- when gas prices got high enough, drivers began cutting back miles driven and therefore fuel purchases, substitution carpools and public transit for their own cars, whereby sharply cutting back gas tax revenues for the highway trust fund and putting it into deficit. There is a point at which the price of fees begins to diminish revenues derived from them. Do we know enough about the elasticity of demand for mitigation permits and in-lieu-of fees that go with them?

7. Eliminate "the precautionary approach" as a regulatory philosophy. This approach leads inevitably to subjectivity, opinion-based policy, and fact-free analysis. Lack of adequate science should not necessarily lead to inaction, but to an experimental approach, whereby the science that we do have can form the basis of a testable hypothesis, leading to pilot projects to see if the hypothesis is true enough to yield some good results.

8. Last, a local issue. In B.2. "Near Term Actions" there is an item to fund a one-year pilot program to develop a coordinated cleanup and restoration plan for Port Angeles. I have no problem with merely that, but if this will result in another governmental body doing this, I am unalterably opposed to that

approach. The Port of Port Angeles and the City of Port Angeles have joined forces in creating a Public Development Authority "Port Angeles HarborWorks" to do exactly that function. If State funding goes to HarborWorks to accomplish this cleanup plan through a community outreach effort, I'm all for it. Otherwise, no.

From: Allison McGinnis

Comment: This is such an unfortunate turn of events. Our poor whales that have already been reduced to under 90 members and now they lose another 7. There is no excuse for why these whales are disappearing... especially if what they say is true about them starving to death. That's horrible. I know most people won't agree but I really believe we should put a halt to salmon fishing altogether. I mean at least for awhile until the population can make a comeback. We as people have so many other alternatives to eat. We have billions of animals slaughtered every year and served up in various dishes. We have people who feel it's neccessary to go out and "hunt" wild game. We have other types of fish to choose from that aren't so threatened and not only that but there is farmed salmon available. I know there's good money in it and that wild salmon is a Pacific Northwest staple but so are the whales and I think they deserve our greatest effort at a chance for survival no matter what it takes.

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From: Bryan McKinnon

Comment: Dear Puget Sound Partnership,

Thank you for your commitment to developing an Action Agenda for a healthy Puget Sound. From struggling orcas to toxic chemicals in our water, the Sound needs quick and decisive action today. I want to make sure we pass a thriving Puget Sound on to future generations.

I urge the Partnership to incorporate accountability, benchmarks of success, and ample funding into this Agenda.

The draft Action Agenda includes many of the essential elements that need to be accomplished, but in addition, the final Action Agenda must also:

-Amend the Cruise Ship MOU to ban all cruise ship discharges in Puget Sound;

-Prioritize the protection and restoration of the State's forage fish spawning beds;

-Complete the Management Plan for the Cherry Point Aquatic Reserve;

-Identify adequate and sustained funding for Plan implementation;

-Update the guidance for open water dredge disposal of PCBs;

-Expand the indicator species to include forage fish abundance and harbor seal toxics loading; and

-Accelerate the restoration of the Elwha River.

Thank you for your hard work to develop a draft Action Agenda to restore, protect and recover Puget Sound to health by 2020.

On behalf of everything from eelgrass to orcas.

From: Rachel McLellan

Comment: Dear Puget Sound Partnership,

We need to act now to protect our endangered Orca population. We just lost 10 percent of the small Puget Sound pod. At this rate, these Orcas will be extinct in nine years. They are part of our region's heritage and identity. We need to do all we can to save them.

Please improve your action agenda's recommendations on pollution prevention.

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From: Mary McLoone

Comment: Dear Puget Sound Partnership,

I am writing to urge you to improve your action agendas recommendations on pollution prevention.

From: Ahlyshawndra Means

Comment: Dear Puget Sound Partnership,

The Partnership staff, the Leadership Council, Ecosystem Coordinating Board, Science Panel and stakeholders throughout the Sound deserve praise for the monumental effort involved in producing the draft Action Agenda. The next step is to finalize a plan that is accountable, transparent, effective and have dedicated new funding sources to the recovery of Puget Sound by 2020.

The Partnership must create a real 2020 Action Agenda, not just a 2-year plan that clearly identifies the specific actions that are needed over the next 12 years and the HOW and WHO and BY WHEN each action must be completed. All the actions need to be tied together into a comprehensive whole through measurable benchmarks that must be accomplished in order to achieve recovery by 2020.

Thank you for this opportunity to strengthen a strategy to save Puget Sound.

From: Jenny Mears

Comment: Dear Puget Sound Partnership,

I am writing to urge you to improve your action agenda's recommendations on pollution prevention.

From: Jules Michel

Comment: Dear Puget Sound Partnership,

As a third generation shoreline and tideland property owner I have watched the slow but steady and mearsurable degradation of Puget Sound's waters, tidelands and nearshore environment. Wild salmon runs have decreased 92%; wild bird populations have decreased over 40%; and most recently, the iconic Orca pod populations have dropped.

We are at a nexus. Well intended efforts have fallen short through a lack of funding and enforcement, without which efforts to minimize impacts and restore Puget Sound are for naught.

The hard work to develop a draft Action Agenda to restore, protect and recover Puget Sound to health by 2020 is appreciated by all. With shoreline development increasing and changing tideland aquaculture techniques, the need for agencies; organizations; and individuals to be held accountable has never been more important.

To that end, I would like to offer the following comments in the hope that these efforts will not fall after

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their initial glory has passed.

1. The areas of concern need to include the tidelands which are an integral part of Puget Sound's ecosystem. Specific regulations controlling how these are impacted, or whether they should be, need to be prioritized in the planning process, on an equal with shoreline development. You cannot separate the two. Part of the inclusion of tidelands needs to be the development of a database of how many tideland acres there are; their ownership; and their current use.

2. Funding for enforcement is critical and needs to be a priority. One of the primary beneficiaries of a healthy Puget Sound is the shellfish industry. An untapped source of revenue is taxing the tidelands at an amount relative to the true value of these tidelands. Mason County only collects $2 to $3 per acre for tidelands producing up to $1 million every five years. This is typical throughout Puget Sound, with only Thurston County beginning to effectively address this. In addition, the Enhanced Shellfish Tax (the equivalent of an excise tax) is too easily avoided, as are Business and Occupation taxes. These tax areas need to be addressed in order to help assure adequate funding for enforcement is there. This needs to be followed by an assertive implementation of fines for those who choose to ignore the regulations. So doing will create a "profit center" whose funds in turn will help to assure that the plan is being implemented and enforced.

3. Inclusion of the Action Agenda points, with the following expansions:

a) Prohibit tideland development near forage fish spawning beaches, and assure that new bulkheads near feeder bluffs and forage fish spawning beaches can be designed in a low/no impact manner.

b) Related to point 2 above, fund local governments to develop and carry out shoreline master programs and enforcement staff at state agencies and local governments through a realistic taxation of those benefiting the most from a healthy Puget Sound.

c) Implement long range planning beyond 2 years which includes measurable points and clear accountability.

d) Expand the indicator species to include more than just salmon, i.e. forage fish, harbor seals, avian species.

The Action Agenda is a well focused document which will begin to correct years of impact to the waters, shorelines and tidelands of Puget Sound. With refinement and adequate funding for development and enforcement, the restoration of Puget Sound for our children's children to enjoy as we have will be moved forward.

From: Donna Mikula

Comment: Dear Puget Sound Partnership,

While I am encouraged by your commitment I am urging you to improve your action agenda's recommendations on pollution prevention. We must have provisions that will move Washington's businesses toward safer alternatives and completely away from chemicals that are harmful to our environment, humans, and wildlife.

It is not acceptable to omit the safeguards that are needed to prevent further degradation. Proposals

must include increasing the avaialbility of technical assistance to ensure the reduction of chemical usage, developing a state program that will focus on researching safer alternatives, and requiring the mandatory disclosure of all chemicals and toxic materials used in industries of all sizes.

Definitive steps to stop ongoing pollution must be undertaken if cleanup efforts are to be able to prevent the extinction of Orca whales. Thank you.

From: Chris Miller

Comment: Dear Puget Sound Partnership,

your action agenda formulation comes on the heels of too many well known environmental failures to protect and restore the health of puget sound. even now, stormwater continually flows into the sound. even now, mixing zones contaminate our marine life with toxins such as rat poison (arsenic). even now, development goes on, paving over more and more of our pervious, living filtration systems.

how are we to restore health to the sound, and give the most meaningful gift we can possibly give to future generations who live here: a healthier ecosystem than we have right now?

the clean water act, federally, has been a disaster, and not lived up to its lofty ideals. the puget sound water quality authority was unable to restore the sound; nor was it able to stave off the next twenty years of damage to the sound that was to come. the puget sound action team similarly failed.

the entire earth is becoming a cesspool of human waste. hood canal and south puget sound are becoming rank and rancid with the waste of our bodies and our civilization.

if we cannot get our act together, what hope does the rest of the world have for restoring itself to health?

puget sound has the opportunity to be a beacon of hope for the entire globe - has the opportunity to set the tone in regional sustainability - has the opportunity to establish a fertile, verdant estuary leaping with life and resplendant with the care we instilled within it, somewhere the rest of the world looks for societal models that balance thriving businesses and sustainable practices - even though the life may be, in salmon's case 92%, in seabirds over the last 20 years 47%, there is still that possibility - that hope - that belief, that we as inhabitants of this great and gorgeous glacial-carved nook nestled 'tween mountain ranges have within us the ability to treasure its emerald terrain and sapphire seas.

we must ask ourselves if we plan to engage in the tyranny of the generations to come, by depriving them of the experience of a land filled with life, a land invigorating to see, a land awe-inspiring with its co-habitants, animal and humankind.

we must ask ourselves how we can continue to allow the discharge of poisonous, known mutagenic substances, into a living ecosystemic body comparable to a starving, pollution ridden, sensorily-disrupted, tortured patient, a patient in our care, a patient whose health is linked to ours, a patient whose body we live inside?

for as the web of life collapses about us, how can we expect to remain disaffected? it is hubris, the callous, myopic arrogance of charlatans and plunderers, drunk on the hoard.

this partnership must redeem the compact of our people with the species of this region established within the endangered species act. this partnership for puget sound must inspire a generation to fill the gaps, to develop an economy with a firmer base in the sustaining living of our land, preserving, becoming harmonized, and rejoicing in the unique bounty of this our home.

thank you for reading this, for your hard work consulting and debating and arguing and policy hammering, and for your swift and decisive action to shore up the shaky start that is contained within the draft agenda's outlay. as the chesapeake bay restoration project funding escalation shows, the longer we put off hard decisions and tough work, the harder and more expensive the work becomes.

one of my friends has a saying, it goes like this - procrastination is a lot like masturbation, sure, it's fun for a while, but in the end, you're only screwing yourself.

i would add to that also the future generations.

we are smarter than that. we have learned from the mistakes of other major estuary restorations. we have learned that our wanton use of our natural resources and harsh management practices of the only thing that keeps us alive, the ecosystemic web which allows us to breathe, breathing being the first and last things we do in this world. i implore you to find the courage to step up to the challenges in front of you and not do a halfway job of it.

some cities in spain have already instituted policies that require new buildings to contain their own power supplies via solar panels, mirco-hydro-electric, and wind sources.

composting toilets, and/or the usage of rooftop rainwater for the flushing of our toilets will help us to maintain instream flows and simultaneously further minimize stormwater overflow events, yet both practices are currently illegal. remove barriers barring do-it-yourself environmentalists from conservation-minded innovation in as many ways as possible - these smaller inventions will allow us to innovate technologies the entire world can use to its advantage and ours. strike down laws prohibiting the resuage of all 'containers' in washington, or call for such laws to be re-written to reflect the ability of our society to effectively reduce waste and reuse our own manufactured items, thereby creating local jobs in the re-usage industries, saving natural resources, and sparking further innovation throughout the country and world.

thank you again very much for your efforts and may the rewards - yours and ours and puget sounds - ring true.

The Partnership staff, the Leadership Council, Ecosystem Coordinating Board, Science Panel and stakeholders throughout the Sound deserve praise for the monumental effort involved in producing the draft Action Agenda. The next step is to finalize a plan that is accountable, transparent, effective and have dedicated new funding sources to the recovery of Puget Sound by 2020.

The Partnership must create a real 2020 Action Agenda, not just a 2-year plan that clearly identifies the specific actions that are needed over the next 12 years and the HOW and WHO and BY WHEN each action must be completed. All the actions need to be tied together into a comprehensive whole through measurable benchmarks that must be accomplished in order to achieve recovery by 2020.

Thank you for this opportunity to strengthen a strategy to save Puget Sound.

From: John Miller

Comment: Dear Leadership Council,

Thank you for the opportunity to comment on the Puget Sound Partnership Draft Action Agenda. I appreciate the tremendous amount of work that has gone into developing it and I support the strong list of measures that, if implemented, will go a long way toward recovering Puget Sound by 2020.

The draft plan includes a few omissions. The final plan should include Outstanding Resource Water (ORW) designation under the Clean Water Act as a tool to help protect rivers and other aquatic habitat. While I strongly support the inclusion of Wild and Scenic designation as a similar tool, in some cases ORW designation will likely prove to be a better, more immediate way for the state to ensure the protection of high quality rivers and other waters. Therefore, I urge the Partnership to include support for the Outstanding Resource Water designation as one of its "Near Term Actions." ORW designations permanently protect high quality waters that are ecologically significant, provide cold water refuges for fish, and/or support important recreational values. Many rivers in the Puget Sound region are eligible for ORW designation. I would also like to encourage you to include funds to move up the removal of the two dams on the Elwha from 2012 to 2010. Removal of the Elwha dams is one of the best chances for salmon and steelhead recovery in the region as it will open up over 70 miles of prime spawning habitat. Removing these dams has also been as a key action to recover our Puget Sound's orca population, which is malnourished thanks to a lack of chinook salmon.

Especially during difficult financial times, finding opportunities for economic benefit and job creation is important. Removing the Elwha dams provides a tremendous opportunity for creating "green jobs" and numerous other economic benefits.

Thank you for taking my comments into consideration.

From: Rosemary Mills

Comment: Dear Puget Sound Partnership,

Thank you for your commitment to developing an Action Agenda for a healthy Puget Sound. From struggling orcas to toxic chemicals in our water, the Sound needs quick and decisive action today. I want to make sure we pass a thriving Puget Sound on to future generations.

I urge the Partnership to incorporate accountability, benchmarks of success, and ample funding into this Agenda.

The draft Action Agenda includes many of the essential elements that need to be accomplished, but in addition, the final Action Agenda must also:

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-Prioritize the protection and restoration of the State's forage fish spawning beds;

-Complete the Management Plan for the Cherry Point Aquatic Reserve;

-Identify adequate and sustained funding for Plan implementation;

-Update the guidance for open water dredge disposal of PCBs;

-Expand the indicator species to include forage fish abundance and harbor seal toxics loading; and

-Accelerate the restoration of the Elwha River.

Thank you for your hard work to develop a draft Action Agenda to restore, protect and recover Puget Sound to health by 2020.

On behalf of everything from eelgrass to orcas.

From: Michelle Minshall

Comment: Dear Puget Sound Partnership,

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-Accelerate the restoration of the Elwha River.

Thank you for your hard work to develop a draft Action Agenda to restore, protect and recover Puget Sound to health by 2020.

On behalf of everything from eelgrass to orcas.

From: Pete Modaff

Comment: The 10-page document lists the typos and other problems we found reading through the draft.

Kelli and I both read the report and here are the typos we found along with some questions about word choice or confusion over sentence meaning. We both noticed that there were inconsistencies in such grammar subjects as hyphenating compound adjectives (run off vs. run-off and clean up vs. clean-up). Also we found instances when the same words were sometimes capitalized and other times were not (federal, state, tribal, legislature). Also there seems to be no rule followed when it comes to mixing up commas and semi-colons during the listing of items.

Introduction

Page 1

In the last graph, perhaps you would want to spell out what "Metro" is in that it is the first reference.

Page 2

In the first graph in item 2, you need the word "to" to go before "determine" for parallel construction. Also you need to capitalize "Legislature".

In the sentence in the second-to-last graph starting "Using goals set out…" the verb "has" is used twice.

In the sentence in the last paragraph starting "Anticipated population growth…" the ending says "amplify current the situation".

Page 3

In item "C" you probably should add "aquatic" before the last word of the sentence "species".

Page 4

In the second-to-last sentence, "importance" rather than "important" should be used.

Page 5

In the 6th line, the word "work" is used twice.

Page 6

In the first paragraph, the word "changes" is missing after "lifestyle".

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Under “Vehicle Operations” “come” should be “comes” and the word “substitute” is misspelled.

Under “Fertilizers and Herbicdes” the last point should say “Plant native species” to avoid the impression you want to “plant” Tribal members.

Page 7

Under “Car Washing”, you may want to say what a “car wash kit” is.

Under “Pet Waste”, you might want to say “your pet’s poop” to avoid the impression that we are referring to human waste.

Under “Household Products/Chemicals” why is “sink” singular but the others are plural?

Question 1

Page 4

In the Table at the top, the phrase beginning with “consistent with” really needs to be on the previous page for readability sake.

Do you need to spell out what “PBDE” is?

Question 2

Page 1

In the first graph you may want to re-phrase “attractive quality of life to attract”.

In the third graph second line, “ecosystem level” should be hyphenated. Also the word “summaries” should be “summarizes”.

In the last line, the word “the” should precede “status”.

Page 2

Under “Human Health” the first sentence under “Action Agenda measure” is an incomplete sentence.

Under “Current Condition” also under “Human Health” in the third line it should be “had” rather than “have”.

Under “Human Well-Being” in the second line “depends” should be “depend”.

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Page 3

Under "Freshwater resources" "Current condition" the Nooksack, Snohomish etc. should be ID'd as Watersheds lest there be confusion with Tribes.

Page 4

In the third graph, you mention "harvest". Harvest of what?

In the 4th graph the phrase "dredging, filling, and paving the land" gives the impression that the land is dredged, which is not the case. Also, does the Sound have a "sea floor"? Also the phrase "especially land conversion" should be set off by dashes, not commas.

Page 5

In the first graph, the phrase "With the first rains" should contain "of Autumn".

In the fourth graph, shouldn't "Water falls" be changed to "rain" in part to avoid any confusion with the word "waterfalls"?

Page 6

In the first bulleted item, "Invasive species" is indented too far.

In the second-to- last line the phrase "amplify current the situation" needs to be corrected.

Question 3

Page 2

In the sentence 5th from the bottom, "was" should be "were".

Page 3

The sentence beginning with "In some cases" is confusing and may have a subject-verb agreement problem.

Page 4

In item "b." the second sentence is missing a period.

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Page 5

In the second paragraph third line, “opportunistic” is not the correct word in that it carries a negative connotation.

Page 6

Doesn’t “pelagic” pertain to the open sea?

Page 9

In A.2.2.1, you need a “the” before “Growth”.

In A.2.2.6, what is “transportation concurrency”?

Page 10

In the first graph under A.3 in the second-to-last line, “maybe” should be “may be”.

In A.3.1., is “rule” the proper term-of-art? Also the second sentence is missing a period.

Page 11

Under A.3.3.3, “Promoted” should be “Promote”.

Page 12

Under A.4, stick with all commas or semi-colons when listing several items.

Page 13

Under A.4.4.1, “publically owned” should be hyphenated.

Under A.4 Item 6, “Resource” should be “Resources”.

Page 15

In graph 3, how can “protection actions” set priorities. Perhaps you meant “protection actions must be based on a set of priorities”? Later in that same sentence, how does “work” “work”? You should re-phrase.

In the third from bottom graph, shouldn’t “uplands” be followed by the word “areas”?

In the final graph, “landowners” should be possessive.

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Page 16

In the fourth line “emphasizing” should be “emphasizes”. The following sentence was impossible to understand.

In the next sentence it should read “The ability to model”.

In the fourth from bottom line, there should not be a comma after “Estuary”.

Page 17

B.3 should have “landowners” as a possessive.

Page 18

Shouldn’t WSU be spelled out and is the term “Extension” readily understood by the public?

Page 21

In line 3, it should be “TMDL”, not “TDML”. How do you implement a “Shellfish Protection District”?

In line 5, “is” should be “are”.

What is a pharmaceutical take back program?

Page 22

In C.2.2.1, the comma after “permits” does not belong.

As an example of usage inconsistencies, you use both “runoff” and “run-off”.

Page 24

Under C.3 item 3, “nutrient” is missing an “s”.

Page 25

In C.4.1.1, what is “3SHB 1458”?

In C.4.1.3. you have “shellfish threatened areas” OMG, the geoducks are attacking and the oysters are following with malice!!!!!!!!!!!!!

In C.5, “involves” should be “involve”. Also, should “bioaccumulate” be explained?

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Page 26

In C.6, wouldn't "become ill" suffice?

In C.6.2, get rid of the comma after "swimming beach".

Page 28

At the top of the page, the third and the fourth bulleted items are the same thing.

In the last bulleted point shouldn't "outcome" be "positive" or something to indicate what kind of outcome we want?

In D.1.1, add an "and" before "land use".

Page 29

In D.1.4 it should read "treaty rights" rather than "right".

In D.1.5, you are missing an "a" before "way".

In D.1.5, how do you make the "killer whale plan" "actionable"?

As an example of inconsistencies the word "State" is both lower and upper-case on this page.

Page 31

In D.3.1.4, what does "HB 2514" mean?

In D.3.5.2. b), "improve" should be "improving".

In D.3.5.3, a), should read: "USFWS should continue to collaborate with the…" in order to maintain a consistent format.

Page 32

In D.3.5.4. c), United States is missing an "s".

In D.3 1, the acronym is wrong – it is missing an "E". Also, what is a "2514" group?

Page 34

In the first line, "with" should be "within".

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In D.4.2. in the 8th line, is “groups’” singular or plural?

Page 35

In the first line, there should be an “of” after “effectiveness”.

Page 36

The first graph needs a period at the end.

Page 37

D.5 item 2, “business” needs to be plural.

Page 38

In the 10th line from the bottom, “reflecting” should be “reflects”.

Page 39

In the fourth line from the bottom “self-report” should be “self-reporting”.

Page 40

In E.1 item 1, the “and” between “as” and “the” needs to be deleted.

Page 41

In item 12, you need a “to” before “support”.

In item 13, the name is U.S. EPA Central Data Exchange. Add “Central”.

Page 42

In the fifth line down, “solicit” should be “soliciting”.

Page 46

In E.3.4.4, “science” should be “scientific”.

Page 47

In item 10, you use “a” and “actions” which is an agreement error.

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Page 48

In E.4.1.3, you need a comma in between “to” and “direct”.

Page 50

In 6, “trainings” should be “training”.

Page 51

In the second paragraph, “Over-time” should be “Over time”.

In the third paragraph, do you really want to use the word “nest”?

In the fourth paragraph line 4, you need a “and” between “area” and “tie”. In line seven of this graph, the members are working to “refine” what?

In the fifth paragraph, you need the word “and” between “maps” and “updates”.

Hood Canal Action Area chart

In the third column, there is “at existing future sewage treatment facilities”. HUH? Also in that column, the phrase “poorly function systems” should use “functioning”.

South Central Action Area chart

In the third column “homeowners” is spelled “homneowners”. Later in that column you discuss the need to “Implement Superfund cleanup at Duwamish River, Commencement Bay” even though there has been Superfund work in Commencement Bay for more than 20 years.

Whidbey Action Area chart

In the first column, the phrase “on west coast” is there. West coast of what?

In the third column is the phrase “Protect and support-term working farms, forests”. What does that mean?

Question 4

Page 1

On the first line it reads “The recovery of a healthy Puget Sound”. Why do you need recovery if it is “healthy”.

Under “Next Steps” in the first line, “identity” should be “identify”.

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In the ninth-from-the bottom line, you need a comma after “to” and before “actions”.

In the second-to-last line, you need to take out the “are” after the word “Those”.

In the chart that follows, in A-1 item 2, you misspelled the word “protecting”.

In A-2 item 7 on the same page, “statues” should be changed to “statutes”.

NOTE: We have not gone through the rest of the charts so cannot report the typos.

In the list of acronyms, NOAA Fisheries is once again NMFS. Also, you have two acronyms “PSP”.

Draft Financing Chapter

Page 1

In the second-to-last graph, the last sentence needs to be clarified. What drives $1.50 and what drives $2.50?

Page 2

In the first sentence you use both the word “required” and “requires”. In addition, there is a subject/verb agreement violation -- “requires” in the second line should be “require”.

In the second paragraph second sentence, there are two problems. The word “proved” should be “proven” but that word needs an adverb such as “effective”. Things can be proven ineffective so you need clarification.

In the third graph, “finance” should be “financial”.

Page 4

In the top chart middle column, the last word “grant” should be “grants”.

In the bottom chart, under “Federal”, the word “Lands” does not need to be capitalized. Also, what about fish passage on Fish and Wildlife Service lands?

Page 5

Shouldn’t the term “water quality trading” be explained?

Page 6

In the third bullet under “Federal Government” you need a “with” between “consult” and “the”.

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Page 7

In the fourth bulleted item the “of” after “create” should be removed and the rest of the sentence needs to be cleaned up. It should read “as well as develop the in-lieu-fee mitigation program.”.

Page 8

Remove “in” after “develop”.

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From: Terry Montonye

Comment: Until you train and hire pollution police, you are wasting time and money. Until then, you'll not be able to quantify the magnitude of the Puget Sound pollution problem let alone do anything much about it.

P.S. FYI, (the) Director of Research for National Marine Fisheries for many, many years, agrees with me.

From: Daniel Moore

Comment: Dear Puget Sound Partnership,

I am writing to urge you to improve your action agenda's recommendations on pollution prevention. The current draft of the action plan does not include provisions that will help move Washington's businesses toward safer alternatives and away from chemicals known to be harmful. These proposals should include increasing the availability of technical assistance to help businesses reduce chemical use, developing a state program to focus on researching safer chemicals and materials, and requiring better industry reporting of the chemicals currently being used.

Thank you for your time.

From: Jesse Moore

Comment: Dear Puget Sound Partnership,

Thank you for your work in taking the first step towards a healthy Puget Sound with the draft Action Agenda. I believe the work you are preparing to do is monumentally important to the preservation of the eco-systemic balance of our beloved Puget Sound. The challenge is huge but with proper planning and dedication I believe that it can be done. As a next step in the Partnership's planning process please consider preparing a document that would plot the 12 year rout to success in all of the projects goals; Including specific project actions, a parametrized time table, named funding sources, and the specific measurable results that would indicate success at each year's end.

Thank you so much for leading the region to a successful preservation of one of our most important assets.

From: Kirsten Moreno

Comment: Dear Puget Sound Partnership,

I am writing to urge you to improve your action agenda's recommendations on pollution prevention.

From: Wm Moritz

Comment: In 6 months we expect to welcome our 1st grandchild into the world. We must begin immediately to make sure that she will be able to enjoy a healthy and vibrant sound that sustains life both in the water and on the land. It's vitally important that we aggressively pursue a comprehensive plan to repair the damage already done and prevent additional damage in the future. One thing that I think you should emphasize in your work is the issue of passively sitting back and accepting that an additional 1.5 million people will be allowed to move into this area. Who says that must be our future? Everyplace has a carrying capacity and the problems we see today are a clear indication that this area is reaching that limit. We should enact very strict limits on additional development. Any development allowed should be done in such a manner that it enhances our environment rather than degrading it. If it can't, then don't allow it. We should tax motor vehicle use (through fuel-based or mileage) so that those who drive more and thus create more pollution pay more to fix it. We need a long term - 20 or 30 year plan. Existing shorelines should be tightly regulated so protect bluffs and beaches. Adequate funding and staffing are critical as are clear benchmarks and accountability. It's a huge task but one we must face and conquer. All of our lives, and those yet to be born, depend on us getting this right.

From: Jeff Morris

Comment: Dear Puget Sound Partnership,

I am writing to urge you to improve your action agenda's recommendations on pollution prevention.

From: Steve Morris

Comment: Dear Sir/Madam

I have looked at your draft proposal for the Puget Sound Partnership and would like to introduce S4S solutions Inc as a company that I believe will assist you in providing a framework to allow you to provide Collaborative Adaptive Management across the disparate groups or individuals that have an interest or input to your plan.

For background information we are currently working in the US with the City of Newport Beach, Californian Ocean Protection Council and the State of California, Department of Conservation Land Resource Protection Department in providing them a solution that will allow them to progress their plans and make decisions based on the input from the various groups.

We are based in Vancouver and would like the opportunity to come and present our story to you and discuss ways in which S4S can play a part in making Puget Sound healthy again and to create a roadmap to get it done.

Please take a look at our website, www.S4S.com an see how we are helping groups like yourselves.

Please feel free to email me or contact me by telephone.

From: Mike Morrissey

Comment: Dear Puget Sound Partnership,

Thank you for your commitment to developing an Action Agenda for a healthy Puget Sound. From struggling orcas to toxic chemicals in our water, the Sound needs quick and decisive action today. I want to make sure we pass a thriving Puget Sound on to future generations.

I urge the Partnership to incorporate accountability, benchmarks of success, and ample funding into this Agenda.

The draft Action Agenda includes many of the essential elements that need to be accomplished, but in addition, the final Action Agenda must also:

-Amend the Cruise Ship MOU to ban all cruise ship discharges in Puget Sound;

-Prioritize the protection and restoration of the State's forage fish spawning beds;

-Complete the Management Plan for the Cherry Point Aquatic Reserve;

-Identify adequate and sustained funding for Plan implementation;

-Update the guidance for open water dredge disposal of PCBs;

-Expand the indicator species to include forage fish abundance and harbor seal toxics loading; and

-Accelerate the restoration of the Elwha River.

Thank you for your hard work to develop a draft Action Agenda to restore, protect and recover Puget Sound to health by 2020.

On behalf of everything from eelgrass to orcas.

From: Mary Beth Moser

Comment: Dear Puget Sound Partnership,

The Partnership staff, the Leadership Council, Ecosystem Coordinating Board, Science Panel and stakeholders throughout the Sound deserve praise for the monumental effort involved in producing the draft Action Agenda. The next step is to finalize a plan that is accountable, transparent, effective and have dedicated new funding sources to the recovery of Puget Sound by 2020.

The Partnership must create a real 2020 Action Agenda, not just a 2-year plan that clearly identifies the specific actions that are needed over the next 12 years and the HOW and WHO and BY WHEN each action must be completed. All the actions need to be tied together into a comprehensive whole through measurable benchmarks that must be accomplished in order to achieve recovery by 2020.

Thank you for this opportunity to strengthen a strategy to save Puget Sound.

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From: Sylvia Moss

Comment: Dear Puget Sound Partnership,

Thanks for this opportunity to add comment. I've lived in Seattle for over 16 years; however my family comes from the East Coast. My father-in-law is an environmental lawyer who worked hard to assist with the Chesapeake Bay's recovery. Unfortunately, their model seems to have been too late for some sea life. Crab no longer is harvested in their waters. We have a chance to be a role model nationally. Let's do it right and create a comprehensive plan that will save our waters for future generations!

Thanks so much to the Partnership staff, the Leadership Council, Ecosystem Coordinating Board, Science Panel and stakeholders throughout the Sound, for their monumental effort in producing the draft Action Agenda. We now move on to the most crucial step which is to finalize a plan that is accountable, transparent, effective and has a fiscal note dedicated to the recovery of Puget Sound by 2020.

To do this, it is imperative that the Partnership create a real 2020 Action Agenda, rather than a stop-gap 2-year plan. The future of our sound needs an extensive plan that clearly identifies the specific actions that are needed over the next 12 years, including detailed deliverables and dues dates. All these actions need to be tied together into a comprehensive and measurable plan, including incremental benchmarks that will demonstrate how we are going to get there by 2020.

Thanks again for this opportunity to add voice as a citizen so that together we may save Puget Sound.

From: Shirley Mouer

Comment: Dear Puget Sound Partnership,

I am writing to urge you to improve your action agenda's recommendations on pollution prevention. Please make choices that will clean-up and restore Puget Sound for generations to come. Children--including my five year old daughter--love orca whales. We need to do everything we can to protect these majestic mammals from toxic chemicals. Thank you for your time and attention to this very important matter.

From: Robert Mueller

Comment: Dear Puget Sound Partnership,

Thank you for your commitment to developing an Action Agenda for a healthy Puget Sound. From struggling orcas to toxic chemicals in our water, the Sound needs quick and decisive action today. I want to make sure we pass a thriving Puget Sound on to future generations.

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-Accelerate the restoration of the Elwha River.

Thank you for your hard work to develop a draft Action Agenda to restore, protect and recover Puget Sound to health by 2020.

From: Guila Muir

Comment: Dear Puget Sound Partnership,

Water is a precious resource, and Puget Sound is the heartbeat of our area. The fact that Orca whales are dying is absolutely unacceptable.

Please! Take steps to improve your action agendas recommendations on pollution prevention.

From: Wendy Mulhern

Comment: Dear Puget Sound Partnership,

I am writing to urge you to improve your action agenda's recommendations on pollution prevention. I want a healthy Puget Sound to be part of the legacy we leave our children.

Many Washington manufacturers continue to use harmful chemicals without any plans to switch to chemicals that are safer for Puget Sound. To protect public health and the environment, Washington's industry must begin phasing out of the worst toxic chemicals and developing plans to switch to safer alternatives.

Please include recommendations to help move Washington's businesses toward safer alternatives and away from chemicals known to be harmful to Puget Sound. These proposals should include:

Increasing the availability of technical assistance to help businesses reduce chemical use.

Developing a state program to focus on researching safer chemicals and materials.

Requiring better industry reporting to Ecology of the chemicals currently being used.

From: Ellen Murphy

Comment: Dear Puget Sound Partnership,

Thank you for your hard work to develop a draft Action Agenda to restore, protect and recover Puget Sound to health by 2020. When it comes to restoring the health of the Puget Sound, where and how we grow matters. Especially in light of the one million new residents the state expects to welcome by 2020. It's more crucial than ever to focus that growth inside our urban areas so that we can preserve our farm and forest land and protect our rural areas to restore critical habitats and watersheds of the Sound.

While I applaud your effort thus far, the Action Agenda can and must go farther. We need a twenty year plan, not a two year plan. All the actions need to be tied together into a comprehensive plan with measurable benchmarks and timelines in order to achieve recovery by 2020.

As you finalize the final Action Agenda, please:

-Balance regulatory change with land acquisition to accomplish long term recovery goals;

-Take advantage of the region's recent vote to build 34 miles of new light rail - we must capitalize on this investment by requiring more intense development near these station areas that are pedestrian, bicycle and transit friendly;

-Identify adequate and sustained funding for the long haul;

-Clearly identify timelines and responsibilities;

-Be based on science;

-Set meaningful standards for habitat protection.

The Partnership staff, the Leadership Council, Ecosystem Coordinating Board, Science Panel and stakeholders throughout the Sound deserve praise for the monumental effort involved in producing the draft Action Agenda. The next step is secure much needed funding. The 2009 legislature must adopt new funding sources dedicated to the recovery of Puget Sound by 2020.

For Puget Sound!

From: Gary Murrow

Comment: Dear Puget Sound Partnership,

I am writing to urge you to improve your action agenda's recommendations on pollution prevention. I want a healthy Puget Sound to be part of the legacy we leave our children.

Many Washington manufacturers continue to use harmful chemicals without any plans to switch to chemicals that are safer for Puget Sound. To protect public health and the environment, Washington's industry must begin phasing out of the worst toxic chemicals and developing plans to switch to safer alternatives.

Please include recommendations to help move Washington's businesses toward safer alternatives and away from chemicals known to be harmful to Puget Sound. These proposals should include:

- Increasing the availability of technical assistance to help businesses reduce chemical use.

- Developing a state program to focus on researching safer chemicals and materials.

- Requiring better industry reporting to Ecology of the chemicals currently being used.

From: Patrick Nash

Comment: Hello,

My name is Patrick Nash. I am a native of San Juan Island. 52+ years of living and boating in the San Juans gives me a little insight as to what has and is happening to our precious Island sanctuary. My mother was raised on Stuart, Waldron, Johns, and her grandpa owned Spieden Island. Her dad was born on Pearl Island.

What I don't understand is why the seal population in and around the Sound and Islands is never taken into account for causing pollution and eating tons of migrating salmon and herring as well as bottom fish. When we were kids it was very seldom we saw a seal and I don't ever recall seeing a sea lion. My first sighting of a sea lion was in the early 1980's while sport fishing for blackmouth in San Juan Channel. Now there are hundreds of sea lions and thousands of seals. We used to be able to row out and catch a bottom fish that was actually large enough to feed a family. Now all you can catch is small ones that would not feed one person. If you are cruising around here and happen to see a bunch of seagulls eating herring, go and investigate what is really going on. You will find a seal or two pushing the herring to the surface for a little game of cat and mouse. If you look close you will find mudsharks (dogfish) also in the mix as well as diver ducks. Herring are, and always have been the main food source for most all fish and birds of the Puget Sound Region. What is going to happen when they are extinct? The sea doesn't have beef and pig to replace the buffalo.

I don't have a masters degree in marine biology, but what I do have is 40 years of cruising the San Juans and lower Puget Sound watching one of the most pristine and beautiful waterways of the world, that has always supported whales and fishermen alike, turn into a depleted marine resource that will eventually be cleaned out. Sure there is pollution that is coming from rivers and roads caused by man but we are getting that figured out and doing something about it. No one has said anything about this ever expanding colony of seals leaving tons of waste in our waters and basically ruining our waters.

I would like to get an accurate count of the seal population and record how much they eat and the waste they leave behind.

I know this figure would be staggering. They have no predators to keep their population under control so they will keep multiplying until some disease kills them off. They have cleaned out some salmon and steal head runs already and will keep doing so until they die or be forced to leave because no herring, salmon or bottom fish exist.

Humans have been working on this problem for a while now. Holding tanks, clean bilges, biodegradable soaps, and keeping streams cleared with proper vegetation. What about trying oil absorbents in all street drains that go into the ocean. (We use them on our boats.) Has anyone ever

studied how much rain water has run into our oceans and not into the the earth from so much concrete in this world? Could this cause the ocean to rise, causing polar caps to melt? There is lots to think about that is going on around us, and everybody seems scared to talk about it.

It is time to act, and one of the Pacific Northwest marine related problems is to many seals for the food chain. Please think about this before we are to late to act.

I am a very concerned local sport and commercial fisherman who is raising kids and trying to explain what the difference's are from when I was a kid to the problems that they will be facing growing into adults.

I hope someone reads this and returns a thought back. Thanks for your time.

From: Daine Nash-McFeron

Comment: Dear Puget Sound Partnership,

Seven of our beloved orcas are missing and may be dead, perhaps due to the pollution of Puget Sound.I am writing to urge you to improve your action agendas recommendations on pollution prevention.

From: Sally Neary

Comment: Dear Puget Sound Partnership,

Thank you for your commitment to developing an Action Agenda for a healthy Puget Sound. From struggling orcas to toxic chemicals in our water, the Sound needs quick and decisive action today. I want to make sure we pass a thriving Puget Sound on to future generations.

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On behalf of everything from eelgrass to orcas.

From: Alyse Nelson

Comment: Dear Puget Sound Partnership,

I am writing to urge you to improve your action agenda's recommendations on pollution prevention.

From: Edith Loyer Nelson

Comment: Dear Puget Sound Partnership,

Thank you for your hard work to develop a draft Action Agenda to restore, protect and recover Puget Sound to health by 2020. When it comes to restoring the health of the Puget Sound, where and how we grow matters. Especially in light of the one million new residents the state expects to welcome by 2020. It's more crucial than ever to focus that growth inside our urban areas so that we can preserve our farm and forest land and protect our rural areas to restore critical habitats and watersheds of the Sound.

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For Puget Sound!

From: Jennifer Nelson

Comment: Dear Puget Sound Partnership,

Thank you for your commitment to developing an Action Agenda for a healthy Puget Sound. From struggling orcas to toxic chemicals in our water, the Sound needs quick and decisive action today. I want to make sure we pass a thriving Puget Sound on to future generations.

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On behalf of everything from eelgrass to orcas.

From: Joseph Nelson

Comment: Dear Puget Sound Partnership,

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-Accelerate the restoration of the Elwha River.

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On behalf of everything from eelgrass to orcas.

From: Julia Nelson

Comment: Dear Puget Sound Partnership,

I am writing to urge you to improve your action agenda's recommendations on pollution prevention.

From: Richard Nerf

Comment: A very comprehensive analysis and plan. It should serve as a great foundation for building our best response to the challenges ahead.

From: Theresa Neylon

Comment: Dear Puget Sound Partnership,

Thank you for your commitment to developing an Action Agenda for a healthy Puget Sound. From struggling orcas to toxic chemicals in our water, the Sound needs quick and decisive action today. I want to make sure we pass a thriving Puget Sound on to future generations.

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The draft Action Agenda includes many of the essential elements that need to be accomplished, but in addition, the final Action Agenda must also:

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-Prioritize the protection and restoration of the State's forage fish spawning beds;

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-Update the guidance for open water dredge disposal of PCBs;

-Expand the indicator species to include forage fish abundance and harbor seal toxics loading; and

-Accelerate the restoration of the Elwha River.

Thank you for your hard work to develop a draft Action Agenda to restore, protect and recover Puget Sound to health by 2020.

On behalf of everything from eelgrass to orcas.

PugetSoundPartnership
our sound, our community, our chance

TO: Puget Sound Partnership
SUBJECT: Comments on the Draft PS Action Agenda.
DATE: 20 November, 2008

Dear David Dicks and Puget Sound Partnership Members:

I first want to thank you for your effort in involving a cross-section of stakeholders in drafting the action agenda. My husband, Dr. Uwe Tietze, and I have attended a number of the local action area meetings and were impressed at the number of people who came with excellent ideas for solutions based on their first hand experiences, particularly with shortcomings in land use planning and practices, environmental enforcement and standards.

As a waterfront land owner growing clams along Eld Inlet, in Southern Puget Sound, the restoration of Puget Sound's health is an absolute necessity that has been long awaited. You will find that most people living along the waterfront and in the watersheds of the Puget Sound Basin are well aware that Puget Sound needs bold action from a variety of public and private organizations, agencies and levels of governance to address the long recognized sources of stress to the Sound's ecosystem.

While the draft action agenda has strengths, it does not entirely reflect the commitment and interest expressed at the public meetings for the kind of bold and both financially and politically feasible benchmarks and actions that would be achievable within a reasonable timeframe to achieve a healthy Sound by 2020.

This goal of restoring the health of Puget Sound by 2020 is the Partnership's central time-limited goal, and is really the defining feature of your program. All efforts must be made to try to achieve this goal at the outset. Should some of the benchmarks not be achieved along the way, these can be adjusted over time, with credibility, but only after the public has seen that a demonstrated and deliberate effort is given towards their success from the outset and lessons learned are incorporated so to achieve success in meeting the new benchmark.

My comments below reflect a few of the fundamental areas where the Action Agenda would need to be strengthened to achieve the Partnership's legislative mandate to restore the health of Puget Sound by 2020.

<u>(1) Improve Performance Measures by including values of Puget Sound's natural capital and ecological services.</u>

As you well noted in the Action Agenda, Puget Sound is important to our state's regional economy and produces valuable economic benefits. More specifically, David Baker et al.*, have conservatively valued the benefits of the ecological services from Puget Sound to be between 7.4 to 61.7 billion. These services are free if we simply maintain the natural capital of Puget Sound's resources. The natural capital of Puget Sound Basin is conservatively valued at 243 billion to 2.1 trillion (David Baker et al. 2008).

Maintaining our natural capital should be built into Priority E (pg 56), as a performance indicator under the Performance Management System. We need an inclusive accounting system that measures the amount of our natural capital and the subsequent ecological and economic services that are produced.

Our current policies that measure and thus promote growth in sales revenue and other traditional means of defining "economic success" at the state and local level really are inconsistent with our desire for progress in preserving our natural wealth and the services we receive and depend on for both ecological and economic health. Are we loosing more economically than we have gained with our current economic development priorities and goals? This is an important question the Partnership must ask and try to answer in the performance measures. The measures of success for all levels of government need to value our *net* economic progress. Inclusion of natural capital and ecological services into these performance measures and the states broader measures of success will help indicate *net* economic progress.

(2) Reduce general budget burdens to allow funds for Actions

We have seen that as we have grown in population (largely from in-migration), and commercial and residential development, our public funds have spiraled downward. Our state and local governments are now planning where to take budget cuts and staff reduction.

Clearly, our regional growth has not been sustainable. The principle that "growth should pay for growth, or, that the price of each product should include all the direct and indirect costs of producing it", which has been incorporated in Washington State statute since 1959, when utility connection fees were first authorized. This authorization was expanded with the adoption of SEPA mitigation fees (1982) and impact fees under the Growth Management Act (1990). In addition, Transportation Benefit Districts received impact fee authority in 1987 and local governments can charge transportation impact fees under the Local Transportation Act of 1988. All of these fees are directly related to the costs of the new public services that are needed to accommodate growth.

These authorizations were wisely incorporated to avoid such government budget crises that we are experiencing today.

The current funding sources in the Action Agenda are, first, short of the amount of funds that are needed to fund the actions and secondly relying on a legislature that will need to cut funding rather than extend funding to new programs.

The Partnership must be prudent with our government funds. Funding of the actions must look at inconsistencies and efficiencies that are available to the government without new expenditure. The Partnership is in an ideal position to ask the legislature and county governments to require impact fees for new residential and commercial development in either Puget Sound Counties or state wide. Right now we are funding what could be

covered with impact fees for commercial and residential development under the general state budget and the local county budgets. Reducing this burden and instead funding development with a greater share of impact fees would free up more of the general budget fund for the Plan's actions.

(3) Reform the Growth Management Act to allow ecological carrying capacity

It's widely recognized that the GMA needs reform in order to achieve its own goals of sustainability. The GMA states among other lofty goals, that "the land speaks first" yet many of its policies directly lead to the opposite effect. However, two major flaws prevent this.

First, the population targets for each county are set by the state, and without regard for ecological carrying capacity of the areas among other considerations. There is a market factor for the population targets but no ecological factor. These targets do not allow for the self determination that communities and Counties will need in order to plan and make decisions at an action area and watershed level, which is important for achieving a healthy Sound by 2020.

Second, the GMA does not allow landscape scale planning which is equally important for achieving success of both the GMA and Partnership goals.

Related to these land use considerations, an earlier Partnership draft of actions included vesting reform. This should be brought back into the current set of proposed actions to bring to the legislature. Without vesting reform, our work in improving land use regulations will be severely impaired.

Thank you for your consideration and good work so far. Its important to keep in mind when reviewing the above that the 4 November election results have given us lessons in relevant areas - that people are quite open to understanding issues in depth and supporting solutions that are practical and that achieve public benefit rather than special interest benefits; and more specifically, that the special interests no longer have the political influence they once did. A combination of factors make this an ideal time to propose the bold measures needed to achieve the Partnership's goals of a healthy Sound by 2020.

Sincerely,

Donna J. Nickerson
6345 Murray Court NW
Olympia, Washington

* Baker D. et al. 2008 A New View of the Puget Sound Economy – The Economic Value of Nature's Services in the Puget Sound Basin. Earth Economics. Tacoma, WA.

From: Ariana Nicoli

Comment: Dear Puget Sound Partnership,

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-Identify adequate and sustained funding for Plan implementation;

-Update the guidance for open water dredge disposal of PCBs;

-Expand the indicator species to include forage fish abundance and harbor seal toxics loading; and

-Accelerate the restoration of the Elwha River.

Thank you for your hard work to develop a draft Action Agenda to restore, protect and recover Puget Sound to health by 2020.

On behalf of everything from eelgrass to orcas.

From: Lisa Niehaus

Comment: Dear Puget Sound Partnership,

I am writing to urge you to improve your action agenda's recommendations on pollution prevention. Reducing the use of toxic chemicals is an important step in reducing the quantity of these chemicals that reach the Sound. The action agenda should include increasing the availability of technical assistance to help businesses reduce chemical use. It should require development of a state program to focus on researching safer chemicals and materials. It should require better industry reporting of the chemicals currently being used in Washington both by industry and by agriculture and landscape professions. It should also support currently proposed legislation to require pharmeceutical companies to set up take back programs to keep used medication out of the garbage and out of the sewage system and the Sound.

From: Wendy Noritake

Comment: Dear Puget Sound Partnership,

Thank you for your hard work to develop a draft Action Agenda to restore, protect and recover Puget Sound to health by 2020. It could not come at a more pressing time, especially for the Sound's iconic and endangered orca whale. Just this month, researchers reported seven orcas "10% of the Puget Sound population" are missing and believed to be dead. Some experts say dwindling populations of endangered Chinook salmon are at least partly to blame. Is this a sign that our ecosystem is on the verge of collapsing?

The urgency of restoring the Sound to health is at a tipping point and missing orcas are the Sound's "canaries in the coal mine," telling us we are running out of time. But there is hope for the orca, as there was hope for the bald eagle, the California Condor and others on the verge of extinction. The Puget Sound Partnership's Action Agenda is a golden opportunity to do what has not been done for over 20 years- develop and implement a recovery plan that is accountable, effective, transparent and decisive with sustained funding to restore this national treasure to health by 2020.

The draft Action Agenda includes many of the essential elements that need to be done:

-Require low-impact development to reduce stormwater pollution;

-Prohibit new bulkheads near feeder bluffs and forage fish spawning beaches;

-Fund local governments to develop and carry out shoreline master programs;

-Fund enforcement staff at state agencies and local governments;

-Implement specific, aggressive cleanup plans for polluted waters, including TMDLs;

-Fully fund a permanent year-round rescue tug at Neah Bay for oil spill prevention;

-Acquire critical intact parcels for habitat protection and conservation;

-Set strong requirements for water quantity, such as setting in-stream flow for all major rivers.

BUT, more than a list of Soundwide and Action Area-specific actions, the Partnership must create a real 2020 Action Agenda, not just a 2-year plan, that clearly identifies the specific actions that are needed over the next 12 years and the HOW and WHO and BY WHEN each action must be completed. All the actions need to be tied together into a comprehensive plan with measurable benchmarks and timelines in order to achieve recovery by 2020. The final Action Agenda must:

-Clearly identify timelines and responsibilities;

-Identify adequate and sustained funding for the long haul;

-Be a visionary and long term plan;

-Be based on science;

-Offer a comprehensive and robust program to prevent all sources of stormwater pollution, not just

municipal stormwater;

-Strengthen the list of actions for toxic pollution prevention;

-Set meaningful standards for habitat protection;

-Balance regulatory change with land acquisition to accomplish long term recovery goals;

-Expand the indicator species to include more than just salmon, i.e. forage fish, harbor seals, etc.

The Partnership staff, the Leadership Council, Ecosystem Coordinating Board, Science Panel and stakeholders throughout the Sound deserve praise for the monumental effort involved in producing the draft Action Agenda. The next step is secure much needed funding. The 2009 legislature must adopt new funding sources dedicated to the recovery of Puget Sound by 2020.

For Puget Sound!

From: Donald Norman

Comment: Thank you for the opportunity to comment. I have not been able to continue to participate in the development of this plan due to conflicts in work, but I look forward to see how it will be implemented. I am disappointed in the lack of detail, the lack of implementation of vision, and especially the lack of clearly demonstrating that PSP understands how to measure its outcomes and use an adaptive management strategy. A clearer set of outcomes, indicators and measurement methods needs to be developed for each of the basins. This is clearly shown by the lack of presentation of any detailed monitoring plans that show how the data being collected is linked to show the results of management actions (or experiment). A woman drowns in her basement in a rainstorm in Seattle. The solution is a bigger drain pipe or a bigger pond. Not much vision. All of the infiltration studies out there, the SeaStreet Project, High Point. But did anyone ask about why it rained that much or who granted the impervious surface permits? We are missing the point in our planning. We are being legally trapped between eminent domain, private property mandates, and "move the problem downstream" mentality. Will we have to charge people on private property by the rain they receive? Or can we just build smarter and change old systems with wildlife friendly swales and other solutions.

Due to the lateness of my comments, I have only time for several simple comments.

1. PSP, in concert with FEMA and local disaster planning groups, should integrate a set of habitat acquisition wish lists, invasive removal projects, and large scale mitigations/restorations with potential disasters. Having worked with FEMA, there are opportunities through its Mitigation section (which may improve in the new administration) that could achieve major changes in Puget Sound in the event of a disaster. This requires that much of the planning for such projects needs to be prepared as a contingency plan or exercise. We must be ready with a plan for FEMA when disaster strikes. The changes in weather patterns we are seeing may just be starting.

2. WDFW should lose its authority for granting hydraulic permits. Why is it even in WDFW? Investigative reporting has shown that essentially all permit requests are granted and I have not heard a response from WDFW. WDFW was not able to demonstrate that their mitigations were successful. All permits should be designed as adaptive management experiments with measureable indicators

linked to those outcomes.

3. There are only 6 outcomes with specific measures listed on Pages 10-11. Many of the details in the Action Area Profiles need to be listed as outcomes. Listing the indicators of success does not show how you will measure the metrics and how you will use adaptive management methods to ensure you are moving in the right direction. Buck up, add more in!

4. There needs to be more effort at mitigating the loss of nearshore forage fish habitat. WDFW has not adequately funded the inventory measurement, trend assessment, or the development of monitoring of mitigations for beaches with spawning sand lance and surf smelt. We need about 10 Dan Pentilla's and a more locally development linked program to address ways to improve foraging grounds for these species. While I could rant from my own bias about the lack of use of birds as indicators of changes in Puget Sound (considering that many bird species have declines over 90% in the past 40 years) I would rather focus upon what they eat. If WDFW cannot perform the function, take it away from them, put in shoreline standards at PSP, and let local contractors do the monitoring. Rather than a Mitigation Bank, develop a Monitoring Bank.

5. The use of PBDE as a "flagship outcome" in terms of ecosystem health is not well connected to storm water associated toxics. The decline in PBDE is actually a goal. While important to measure its reduction in fish, the outcome should be a % removal of PBDE from source products, the indicator would be the measurement of the specific congeners associated with those products in fish associated with the sources, and programs to remove those sources the adaptive management approach. I would rather see the toxics issue connected more to life history and used in a more stressor based regional risk assessment approach as demonstrated by the Cherry Point project at Huxley (see work by Wayne Landis).

6. Develop population level goals for fish and wildlife in each basin linked to CAOs, not just salmon. Until metrics relating to vital rates of populations are measured, creeping development will chip away at habitat and less known aspects of fish and wildlife life history will overwhelm some species. The PHS program at WDFW needs to develop metrics to ensure that populations are being maintained, but to what maintained levels? With funds I received from PSAT, I developed the 1st metric for linking heron populations to summer foraging grounds. Local foraging areas are still not connected to local CAOs to protect the food herons need to survive. And despite the fact that juvenile herons use upland fields for surviving their 1st winter, these are not protected in CAOs. I am working with WDFW right now to revise the guidelines for herons. Stay tuned. Give me some leverage if they cave to development pressures. As a scientist who has been involved in Puget Sound issues for almost 30 years, I can see both the incredible accomplishments and grim tasks ahead. Having worked on CAO issues since the GMA was passed, I recognize that there are still no methods within the PHS system to implement an adaptive management type strategy for PHS species, let alone other species of concern in Puget Sound.

In viewing the statistics for population increase in the next 20 years, much stricter measures need to be taken. Please change your motto to Buck up. Kick Ass. Clean Up. You have my permission to do so. I urge you to obtain some coaching on developing good adaptive management/ outcomes based evaluation. For an example of this in the natural resource arena, I suggest looking at the North American Waterfowl Management Plan. It has provided excellent direction to the North American Bird Conservation Initiative and the plans that have been written for Orgeon and Washington for landbirds by Bob Altman. A similar format could be used for fish and wildlife in Puget Sound.

From: Brita Norvold

Comment: In reading the draft of the Action Agenda I was pleased with the comprehensive approach being taken and the wide array of input collected in the formation of this agenda. The only suggestion that I have is to perhaps include a section in the appendage that describes some of the ecological terms used that may not be known to the average citizen or legislator, such as a term like "pelagic". In addition, maybe include specifically YOUR definitions to terms that are widely used through the document for more clarity and specification, for example what you are referring to when using the term "restoration". This may allow for a more fuller understanding of the document, as well as avoid confusion. Thank you for all of the effort put forth to create this agenda. This stands to make huge difference for generations to come.

From: Tim Nuse

Comment: Dear Puget Sound Partnership,

Thank you for your commitment to developing an Action Agenda for a healthy Puget Sound. From struggling orcas to toxic chemicals in our water, the Sound shows signs of needing our help. I want to make sure we pass a thriving Puget Sound on to future generations. I agree that now is the time to act for Puget Sound. I support decisive action today and for years to come to get the job done.

I urge the Partnership to incorporate accountability, benchmarks of success, and ample funding into this Agenda.

The draft Action Agenda includes many of the essential elements that need to be done:

-Require low-impact development to reduce stormwater pollution incorporated in draft plan;

-Prohibit new bulkheads near feeder bluffs and forage fish spawning beaches;

-Fund local governments to develop and carry out shoreline master programs;

-Fund compliance staff at state agencies and local governments;

-Implement specific, aggressive cleanup plans for polluted waters (the so-called "TMDLs");

-Fully fund a year round rescue tug at Neah Bay;

-Land Acquisitions of intact parcels;

-Strong requirements for water quantity, such as setting in-stream flow for all major rivers;

BUT, more than a list of sound wide actions and actions for each Action Area, the Partnership must create a real 2020 Action Agenda, not just a 2-year plan, that clearly identifies the specific actions that are needed over the next 12 years and the HOW and WHO and BY WHEN each action must be completed. All the actions need to be tied together into a comprehensive whole through measurable benchmarks that must be accomplished in order to achieve recovery by 2020.

The final Action Agenda must: Clearly identify accountability and benchmarks to get us to a healthy

Puget Sound by 2020;

-Identify adequate and sustained funding for the long haul;

-Be a visionary and long term plan; Be based on science;

-Offer a comprehensive and robust program to prevent all sources of stormwater pollution, not just municipal stormwater;

-Strengthen the list of actions for toxic pollution prevention;

-Set meaningful standards for habitat protection;

-Balance regulatory change with land acquisition to accomplish long term recovery goals;

-Expand the indicator species to include than just salmon, i.e. forage fish, harbor seals, etc.

Thank you for your hard work to develop a draft Action Agenda to restore, protect and recover Puget Sound to health by 2020. The next step is to get it funded, and the 2009 legislature must adopt new funding sources dedicated to the recovery of Puget Sound by 2020.

For our beloved Puget Sound!

From: Terry Nussdorfer

Comment: Dear Puget Sound Partnership,

The Partnership staff, the Leadership Council, Ecosystem Coordinating Board, Science Panel and stakeholders throughout the Sound deserve praise for the monumental effort involved in producing the draft Action Agenda. The next step is to finalize a plan that is accountable, transparent, effective and have dedicated new funding sources to the recovery of Puget Sound by 2020.

The Partnership must create a real 2020 Action Agenda, not just a 2-year plan that clearly identifies the specific actions that are needed over the next 12 years and the HOW and WHO and BY WHEN each action must be completed. All the actions need to be tied together into a comprehensive whole through measurable benchmarks that must be accomplished in order to achieve recovery by 2020.

Thank you for this opportunity to strengthen a strategy to save Puget Sound.

From: Kristofer Nystrom

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PugetSoundPartnership
our sound, our community, our chance

From: **Michael O'Brien**

Comment: Dear Leadership Council,

Thank you for the opportunity to comment on the Puget Sound Partnership Draft Action Agenda. I appreciate the tremendous amount of work that has gone into developing it and I support the strong list of measures that, if implemented, will go a long way toward recovering Puget Sound by 2020.

The draft plan includes a few omissions. The final plan should include Outstanding Resource Water (ORW) designation under the Clean Water Act as a tool to help protect rivers and other aquatic habitat. While I strongly support the inclusion of Wild and Scenic designation as a similar tool, in some cases ORW designation will likely prove to be a better, more immediate way for the state to ensure the protection of high quality rivers and other waters. Therefore, I urge the Partnership to include support for the Outstanding Resource Water designation as one of its "Near Term Actions." ORW designations permanently protect high quality waters that are ecologically significant, provide cold water refuges for fish, and/or support important recreational values. Many rivers in the Puget Sound region are eligible for ORW designation. I would also like to encourage you to include funds to move up the removal of the two dams on the Elwha from 2012 to 2010. Removal of the Elwha dams is one of the best chances for salmon and steelhead recovery in the region as it will open up over 70 miles of prime spawning habitat. Removing these dams has also been as a key action to recover our Puget Sound's orca population, which is malnourished thanks to a lack of chinook salmon.

Especially during difficult financial times, finding opportunities for economic benefit and job creation is important. Removing the Elwha dams provides a tremendous opportunity for creating "green jobs" and numerous other economic benefits.

Thank you for taking my comments into consideration.

From: **Tarin O'Brien**

Comment: Dear Puget Sound Partnership,

Thank you for tackling the enormous challenge of saving Puget Sound head on. We appreciate your boldness and your efforts to engage the broader community, to listen to us and to base your decisions on science.

Surfrider Foundation is committed to supporting your efforts, primarily by encouraging people to get out in the watershed and into the Sound, to enjoy it, to appreciate it and to take action to protect and restore it. Through projects like Rise Above Plastics, beach clean ups and ocean friendly gardens, we will do our best to promote Sound stewardship practices.

In order to make sure that we reach our goal of a healthy Puget Sound by 2020, we ask that you strengthen the Action Agenda by incorporating the following recommendations:

- Be stronger on water quality measures by offering a comprehensive and robust program to prevent all sources of stormwater pollution and strengthening the list of actions for toxic pollution prevention.

- Develop different indicators for human well-being to include more opportunity for quality water-based recreation through increased shoreline access, clean beaches, and clean water.

- Be stronger on accountability by incorporating clear benchmarks to get us to a healthy Puget Sound by 2020.

- Create more opportunities and stronger protection programs to improve the public's interaction with the shoreline and achieve enough water quality improvement and habitat restoration to inspire the public to go to the water's edge more frequently.

- Ensure that there is enough funding for Puget Sound to achieve the goals laid out in this ambitious agenda.

Thank you for your hard work to develop a draft Action Agenda to restore, protect and recover Puget Sound to health by 2020.

From: **Erin Ocegueda**

Comment: Dear Puget Sound Partnership,

I am writing to urge you to improve your action agenda's recommendations on pollution prevention.

As a community we need to stop the pollution before it starts. The long term damage is much more costly once the damage is done. the cost in terms of money and the affects on life are disastrous. The Puget Sound is our home and our health is affected by it's poor health and we don't live in it every day. With the loss of major animals like orca whales we are radically changing the sounds eco system. It is a symptom to a larger problem. We are over saturating the sound with pollutants that just don't need to be there. If people can't do environmental safe business than they don't need to do business here. The beauty of this area is unparallel but it may only be a thing of the past if we don't act now.

I implore you to make bigger strides to stop pollution and toxic waste being dumped in our sound.

From: **Dan O'Keefe**

Comment: Dear Puget Sound Partnership,

The Partnership staff, the Leadership Council, Ecosystem Coordinating Board, Science Panel and stakeholders throughout the Sound deserve praise for the monumental effort involved in producing the draft Action Agenda. The next step is to finalize a plan that is accountable, transparent, effective and have dedicated new funding sources to the recovery of Puget Sound by 2020.

The Partnership must create a real 2020 Action Agenda, not just a 2-year plan that clearly identifies the specific actions that are needed over the next 12 years and the HOW and WHO and BY WHEN each action must be completed. All the actions need to be tied together into a comprehensive whole through measurable benchmarks that must be accomplished in order to achieve recovery by 2020.

As we are currently experiencing a drastic loss of the Northwest Orca population I urge you to make

your first priority the saving of this distinct species. A moratorium on all fishing in the Straits, San Juans, and Puget Sound would be a small step. Urging our federal government, through our state's congressional delegation, to control overharvesting of the world's oceans would be another necessary step. Our problems are global, and local, as are our solutions.

Thank you for this opportunity to strengthen a strategy to save Puget Sound.

From: **Thomas O'Keefe**

Comment: 1.I'd like to absolutely commend the emphasis of protection of intact systems and structures. Question 3 page 9 – scenic rivers could have broader language to focus on legislative districts. Olympic National Forest has recommendations for rivers in the Puget Sound area and has specific river management plans.

2.Human well-being. Question 2 page 2, shoreline access to the sound. We recommend that you broaden that to include rivers. Connecting people to waterways establishes stewardship. Cascade Agenda has language about “every 6 miles” there should be access.

3.Q3 page 32 touches US forest service roads, Department of Ecology memorandum with State of WA requiring restoration of forest road networks. It should be a near-term action – reference legacy trails and roads program (Jay Manning supported, Norm Dicks launched)

4.A4, Appreciate innovative approaches to growth and see it as opportunity to move TDR as a near term action.

5.Federal Short list – the list prevents water development and dams. It requires agencies to develop a river management plan. It directs agencies to manage for the resource values of the river.

From: **Sue Oliver**

Comment: One thing I forgot to include on your list of deliverables in the PS cleanup plan is a bullet point about ways in which the public is going to become more accountable for the health of Puget Sound. I saw nothing in there about the need for an awareness campaign that will grab residents enough to make a difference, e.g. clean up of beaches; removing grass (therefore fertilizers); fixing car leaks; washing cars inside a garage rather than on the streets, etc.

Thanks for considering this recommended action item for inclusion.

From: **Sue Oliver**

Comment: Dear Puget Sound Partnership,

I am a native Washingtonian and, as such, love both sides of this state that has blessed me for 68 years with its beauty and natural resources. I grew up eating salmon. I have thrilled to the sight and sound of orcas breaching and "talking" to me as I sailed in Puget Sound. So it is with pain and horror that I watch our once healthy environment head downhill fast. The state's spotted owls, salmon and

orcas are in grave danger as their habitats degrade... in the water - plastic, trash, oil spills, raw sewage and sonar; in the forests and water - non-native species overtaking food and habitat; dams. The list grows...What prompted me to write is the recent news of the dwindling numbers of spotted owls, loss of 7 orcas and reversal of the Navy's restriction re: use of sonar in orca habitat even in the face of copious evidence of death and disability caused by the noise. While I appreciate all your hard work to develop a draft Action Agenda to restore, protect and recover Puget Sound to health by 2020 - a huge challenge and commitment - it is not enough. More than a list of Soundwide and Action Area-specific actions, the Partnership must create a real 2020 Action Agenda, not just a 2-year plan, that clearly identifies the specific actions that are needed over the next 12 years and the HOW and WHO and BY WHEN each action must be completed. All the actions need to be tied together into a comprehensive plan with measurable benchmarks and time lines in order to achieve recovery by 2020. The final Action Agenda must:

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-Clearly identify timelines and responsibilities;

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-Strengthen the list of actions for toxic pollution prevention;

-Set meaningful standards for habitat protection;

-Balance regulatory change with land acquisition to accomplish long term recovery goals;

-Expand the indicator species to include more than just salmon, i.e. forage fish, harbor seals, etc.

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For Puget Sound!

From: **Carl Olsen**

Comment: Dear Puget Sound Partnership,

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I urge the Partnership to incorporate accountability, benchmarks of success, and ample funding into

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-Prioritize the protection and restoration of the State's forage fish spawning beds;

-Complete the Management Plan for the Cherry Point Aquatic Reserve;

-Identify adequate and sustained funding for Plan implementation;

-Update the guidance for open water dredge disposal of PCBs;

-Expand the indicator species to include forage fish abundance and harbor seal toxics loading; and

-Accelerate the restoration of the Elwha River.

Thank you for your hard work to develop a draft Action Agenda to restore, protect and recover Puget Sound to health by 2020.

On behalf of everything from eelgrass to orcas.

From: **Lynne Olson**

Comment: Dear Puget Sound Partnership,

I am writing to urge you to improve your action agenda's recommendations on pollution prevention.

Reducing polluting chemical use will have cost saving impact on the environment, the air we breathe and respiratory disease, the food we eat, and the water we drink. It would save health dollars in the long run.

From: **Janet O'Neil**

Comment: Dear Puget Sound Partnership,

I have read most of the draft and the comments below. I beleive the time to act is now. Like the miracle vote on Mass Transit (I never thought it would pass in this economy), the time has FINALLY come to put the health of our beloved Sound at the top of the list. Businesses and evry sinfle citizen must do their part, or we will find more whales dissapearing, the salmon vanishing and one of the most beautiful areas in the world dying before our eyes.

Thank you for your hard work to develop a draft Action Agenda to restore, protect and recover Puget Sound to health by 2020. It could not come at a more pressing time, especially for the Sound's iconic and endangered orca whale. Just this month, researchers reported seven orcas "10% of the Puget Sound population" are missing and believed to be dead. Some experts say dwindling populations of endangered Chinook salmon are at least partly to blame. Is this a sign that our ecosystem is on the

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verge of collapsing?

The urgency of restoring the Sound to health is at a tipping point and missing orcas are the Sound's "canaries in the coal mine," telling us we are running out of time. But there is hope for the orca, as there was hope for the bald eagle, the California Condor and others on the verge of extinction. The Puget Sound Partnership's Action Agenda is a golden opportunity to do what has not been done for over 20 years- develop and implement a recovery plan that is accountable, effective, transparent and decisive with sustained funding to restore this national treasure to health by 2020.

The draft Action Agenda includes many of the essential elements that need to be done:

-Require low-impact development to reduce stormwater pollution;

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-Fully fund a permanent year-round rescue tug at Neah Bay for oil spill prevention;

-Acquire critical intact parcels for habitat protection and conservation;

-Set strong requirements for water quantity, such as setting in-stream flow for all major rivers.

BUT, more than a list of Soundwide and Action Area-specific actions, the Partnership must create a real 2020 Action Agenda, not just a 2-year plan, that clearly identifies the specific actions that are needed over the next 12 years and the HOW and WHO and BY WHEN each action must be completed. All the actions need to be tied together into a comprehensive plan with measurable benchmarks and timelines in order to achieve recovery by 2020. The final Action Agenda must:

-Clearly identify timelines and responsibilities;

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-Be a visionary and long term plan;

-Be based on science;

-Offer a comprehensive and robust program to prevent all sources of stormwater pollution, not just municipal stormwater;

-Strengthen the list of actions for toxic pollution prevention;

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-Expand the indicator species to include more than just salmon, i.e. forage fish, harbor seals, etc.

The Partnership staff, the Leadership Council, Ecosystem Coordinating Board, Science Panel and

stakeholders throughout the Sound deserve praise for the monumental effort involved in producing the draft Action Agenda. The next step is secure much needed funding. The 2009 legislature must adopt new funding sources dedicated to the recovery of Puget Sound by 2020.

For Puget Sound!

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INDICATORS, TARGETS AND BENCHMARKS

General Comments on Indicators, Targets and Benchmarks.

The rationale for selecting the subset of six provisional indicators, and their associated targets and benchmarks, from the list of provisional indicators that were adopted by the Partnership needs to be better defined. As stated on Question 1/Page 3, the Partnership provided targets and benchmarks for at least one indicator for each goal. Question 2/ Pages 2-3 discusses how the selected indicators relate to specific goals but it does not detail why the particular indicators were chosen from the larger set of adopted indicators that were identified by the regional indicator workgroup (i.e. Phase 1 Provisional Indicator Project). The six selected indicators only partially address the Partnership goals but it is uncertain whether the portions of the goals that are addressed are a higher priority than the portions that are not addressed. For example, the indicator selected to reflect water quality, toxics in pelagic fish, does not address water quality goals pertaining to nutrient enrichment or pathogen contamination. One could argue that the indicator on acres of shellfish growing area that is used for human health indirectly provides information on pathogen contamination (i.e. fecal contamination in commercial growing areas) but indicators of nutrient enrichment are not covered in any of the six selected indicators. Does this mean that nutrient enrichment is not a concern for the Partnership? The emphasis on actions to curtail nutrient enrichment in Hood Canal as detailed in other parts of the Action Agenda suggest otherwise. Likewise, the indicator selected to reflect human well-being, land cover, provides targets and benchmarks for the loss of forests and other natural covers but does offer any rationale for why this one aspect of human well-being is addressed. Was this indicator of human well-being considered more important than indicators of shoreline access or the ability of tribes to engage in harvesting Chinook salmon?

Moreover, it is unclear in the Action Agenda whether the six indicators presented under Question 1 are the only ones that will be used to by the Partnership to report on progress towards improving the health of the Sound. As detailed in the Action Agenda, the Partnership plans to use ecosystem indicators to evaluate progress towards ecosystem recovery (Question 3/ Pages 44, E 3.1) and has planned additional investigation through the Biennial Science Work Plan to better define ecosystem indicators and thresholds (Question 3/ Pages 45, E 3.2.1), known as Phase 2 of the Provisional Indicator Project. Two documents are identified as venues for assembling and synthesizing information on ecosystem indicators, the State of the Sound Report and the Puget Sound Update (Question 3/Page 45-46, E 3.3). Collectively, this suggests that a broad suite of indicators will be used to assess and report on of the health of the Puget Sound (i.e., "assessment indicators"). Thus, the significance of the six indicators highlighted under Question 1 is unclear. Given the work planned to better define ecosystem indicators and thresholds under the Biennial Science Work Plan, it seems premature to select only six indicators for tracking the health of the Puget Sound. I suggest the Question 1 section be reworked to state that a suite of indicators, yet to be decided upon, will be used to assess and report on the health of the sound, however, the Action Agenda will highlight targets and benchmarks for at least one indicator for each goal to demonstrate how the indicators will be used.

Toxics in Pelagic Fish Indicator

The adopted provisional indicators and the subset of six indicator selected to report on progress in improving the health of the Puget Sound represent indicators that are currently available rather than new indicators that are under development. Accordingly, the indicator on toxics in pelagic fish is limited to data on Pacific herring. Pacific herring are a great indicator species for contaminants in pelagic food web because they are consumed by many other fish species, birds and marine mammals. Additionally, the contaminant levels in their tissues should respond directly to reductions in loadings of PCB/PBDEs to Puget Sound. Toxics in herring won't resonate much with the public, which is why we suggested in the indicator's project that the status

and trend data on toxics in herring be presented along with some additional data on how herring impact the food web. Toxics in Chinook salmon resonate more with the public, however, the levels measured in Puget Sound Chinook at terminal fisheries (i.e. at river mouths) reflect both the toxics levels in Puget Sound as well as the degree to which the Chinook reside and feed in Puget Sound. If toxic loadings are significantly reduced, but independently, Chinook become more resident (because of factors related to climate change or changes in the productivity of Puget Sound, etc.), the concentrations of toxics in Puget Sound Chinook could increase. Fillet samples of Chinook salmon from the summer/fall fisheries were last sampled by WDFW in 1996, however, whole body samples of "resident" Chinook were collected marine fisheries in the winter/spring months in 2003/ 2004 and again in 2007. If the Partnership does want to report on toxics in Chinook salmon, I suggest we limit our analyses and reporting to resident Chinook populations which would require new funding or a redirection of existing funds that are currently spent on other species. PSAMP has ongoing data survey for coho salmon fishery but no ongoing funding directed at sampling Chinook salmon. Similarly to Chinook salmon, contaminants levels in coho salmon, reflect oceanic and local sources of contaminants with the local source increasing with residency in Puget Sound. Funding for the coho salmon sampling could be redirected to sample resident Chinook salmon. Resident Chinook samples collected in 2003/2004 could be used as a baseline dataset.

Regardless of whether the Partnership selects resident Chinook salmon or Pacific herring for their toxics indicator species, we suggest that the target and benchmarks be modified. The 2020 target for toxics level for Puget Sound pelagic fish should be broadened to include PCBs and PBDEs and the toxics levels should be 25 to 50 % lower than expected concentrations based on existing loadings and no management actions to reduce loadings. The expected concentrations can be modeled from Ecology's PCB Loadings Model and the targeted increase should reflect the feasibility of implementing action aimed at reducing loading of toxics to Puget Sound.

REDUCE THE SOURCES OF WATER POLLUTION

Prevent Pollutants from Being Introduced into the Puget Sound Ecosystem

The Action Agenda proposes many managements action to prevent contaminants from entering the Puget Sound and impairing the health of its natural resources and outlines nine near-term actions (Question 3 Page 21). Two of the nine actions are aimed at targeting at oil spill prevention and clean-up, however, oil spill prevention should also be addressed in the planned focused out-reach campaign to reduce pollutants (action item #1). Small oil spills account for the majority of spills within the Puget Sound and collectively account for the largest mass of contaminants entering our the Sound. A focused out reach out-reach campaign could make significant in-roads in reducing loading of oil related products to the system.

Promoting efforts to reduce the number of vehicles on the roads, as a means to reduce pollutants entering Puget Sound from roads and parking lots (C.1.2.2), should be expanded to support efforts for producing cleaner vehicles. Planned actions to increase density in developed urbanized areas will increase pollutants loading associated with roadways that appear to be associated with pre-spawn mortality in coho salmon, unless considerably efforts are undertaken to reduce both the number of vehicles and the amounts of pollutants from individual vehicles.

Use a Comprehensive and Integrated Approach to Managing Urban Stormwater and Rural Surface Water Runoff

The Action Agenda provide eight near-term actions for managing stormwater and surface runoff (Question 3, Pages 23). Collectively, these actions provide a comprehensive approach to

improving water quality to protect the health of our biological resources. We encourage the Partnership to highlight the importance of retrofitting existing developed lands to reduce contaminant loadings to Puget Sound, if we are to see any significant improvements by 2020. Currently runoff from developed lands accounts for the majority of PCBs that enter Puget Sound and current models suggest that a 50% reduction in loads in needed to improve contaminant level in biological resources. Planned actions to increase density in developed urbanized areas will increase pollutants loading, even with low impact development strategies, such that the efforts to retrofit existing developed lands will need to be enhanced greatly if we are to significantly decease contaminants loads to Puget Sound.

Prioritize and Complete Upgrades to Wastewater Treatment Facilities

The near-tern actions (Section C.3) identified to reduce loadings from wastewater will help to remove pathogen and nitrogen loadings to Puget Sound but may not remove many of the endocrine disrupting compounds (EDCs) that are present in the pharmaceuticals and personal care products that enter waste water treatment facilities. Although, the Action Agenda does identify the importance of investigating and investing in technologies that reduce emerging chemicals (C 3.4) this activity is not listed as a near-term action. Given the high proportion of male flat fish that show evidence of feminization in urban embayments like Elliott Bay, near-term actions are warranted. Additionally, near-term actions to reduce the inputs of raw sewage and stormwater from Combined Sewer Overflows (CSOs) events should be addressed. Actions to evaluate technical and programmatic solutions to CSOs are presented in Action C.2 #5, however, CSOs should also be referred to in the wastewater treatment section. Although the volumes of untreated water entering Puget Sound from CSOs during storm events are relatively small, concentrations of EDCs will likely be considerably higher than outputs from wastewater treatment facilities and may results in significant localized effects.

Continue to Monitor Swimming Beaches and Conduct Fish Advisory Programs

The description of the monitoring programs to reduce human exposure to health hazards (Question 3/ Page 26, C.6) needs to be modified to acknowledge that the Department of Fish and Wildlife (DFW) monitors for the contaminant levels in marine fish that are used by the Department of Health (DOH) to generate fish advisories.

The sentence "Monitoring information assists with making decisions about swimming beaches, shellfish closures and fish advisories." should be modified to read "This monitoring information assists with making decisions about swimming beaches and shellfish closures. The Department of Fish and Wildlife monitors toxics in Puget Sound marine fish. Monitoring data generated from this program is used by the Department of Health to make decisions about fish advisories."

Additionally, the Table listed under Question 4 that summarizes all of near-term actions should be modified to list DFW as a partner with DOH for action #2 under C.6.

BUILD AND IMPLEMENT THE MANAGEMENT SYSTEM TO SUPPORT THE IMPLEMENTATION AND CONTINUALIMPROVEMENT OF THE ACTION AGENDA

Continually Improve the Science for Management Actions in the Puget Sound Through a Comprehensive and Prioritized Regional Science Program (E.3)

Near-term actions recognize the need to fund ongoing monitoring programs (E.3. Action Item #1), however, no actions are identified to restore funding to monitoring programs that have been cut in recent years. Insufficient staff and funding exist for several components of the Puget Sound Assessment and Monitoring Program (e.g. Fish Contaminant Monitoring), such that reporting timeline are not likely to be met for the Puget Sound Update and the State of the Sound. Additional funding is needed to restore critical functions of these programs.

MINOR COMMENTS

Question 2: What threatens the health of Puget Sound?

Habitat Alteration and Land Cover: The link between dock installations and starving orcas (Question 2, Page 4) is tenuous at best and not well developed. Herring stocks in the central and southern Puget Sound are stable, yet these areas have the largest land conversions to unnatural covers in the Puget Sound.

Surface and groundwater supply and availability: The "quality" as well as supply and availability of surface and groundwater should be highlighted as a significant threat to Puget Sound. For example, altered runoff patterns associated with land development can increase flooding but it also serves as a conveyance system for pollutants that are deposited onto the land. Thus, the surface and groundwater supply and availability represents an even greater threat to Puget Sound than is portrayed. A discussion of the "quality" of the surface and groundwater supply and availability should be added.

Question 3: What actions should be taken that will move us from where we are to today to a healthy Puget Sound by 2020?

Improving strategies and actions over time: The Action Agenda notes two studies detailed in the Biennial Science Plan that will be used to refine protection strategies, one on watershed scale study of the effects of changes in land use patterns and one on stressors affecting the pelagic food web. Both of these study will provide valuable information to assist managers with protection strategies, however, the utility of these studies would be enhanced by including water quality parameters such as toxics. Currently, as written, these studies do not address habitat related parameters but do not include water quality parameters.

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Provisional targets and benchmarks for evaluating Puget Sound ecosystem recovery

Legislative Goal	**Provisional Indicator**	***Indicator Description***	***Unit of measure***	***Baseline (date and measure)***	**Benchmark** – *interim milestone (date and measure)*	Target – desired condition for 2020 (unless other date specified)	Baseline: Questions to establish a baseline
Water quality Human Health Human Well being	Shellfish growing areas	acres of commercial shellfish growing area open for direct harvest based on improved sanitary conditions	acres		Net increase of 1,000 acres by June 2011	Net increase of 10,000 acres by June 2020.	What is the total amount of commercial shellfish acreage? How many acres are currently open?
Human well being Habitat	Land in farms	Acres in farmland from the agricultural census			xxxx acres in farm land in 2012 and 2017	Maintain acreage of farmland at levels observed in 2007 agriculture census.	What is the 2007 number of acres in farmland?
Water quality Species/food web viability Human health Human well being	Toxics in pelagic fish	Unclear?			Recovery Council and NOAA Fisheries implementation review in 2015 finds that the primary factors limiting the status of populations and the ESU are decreasing.	By 2055, two to four viable populations of Chinook salmon in each of five regions: Strait of Georgia, Strait of Juan de Fuca, Hood Canal, Whidbey Basin, and Central/South Puget Sound	What is being measured here? Levels of toxics? Or the status of specific Chinook populations? Is this a management decision based on other monitoring? Or can you state the levels of toxics in the fish? Ideally, we will use whatever indicators NOAA will use to measure this.
Habitat Species/food web viability	Eelgrass status and trends	Eelgrass acreage and depth profiles recovers to levels observed in 2000 by 2015			xxx acres, xxxx inches average depth	xxx acres, xxxx inches average depth	What is the 2000 baseline? How many acres? What average depth? What historical baseline will be set as a target?
Water quantity habitat Species/food web viability	Percent exceedance of instream flows	Number of watersheds meeting minimum instream flows set by rule or other agreement			12/12 watersheds	12/12 watersheds	How many watersheds? How many have set their flows? Will they become more strict between now and 2020?

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Provisional Indicator	Indicator Description	Legislative Goals	Unit of measure	Baseline measure	Baseline Date	**Benchmark** – *interim milestone*	Benchmark Date	***Target*** *– desired condition for 2020 (unless other date specified)*		Lead
Shellfish growing areas	commercial shellfish growing area open for direct harvest based on improved sanitary conditions	Water quality Human health Human well being	Number of Acres			Baseline amount plus 2,000 acres	30-Jun-11	Baseline plus 10,000 acres	30-Jun-20	Stuart Glasoe DOH 236-3310
Land cover			Percent		2001	For each action area in 2011: forest acreage below 1000 feet is at least 95% of 2001 level; impervious area is not more than 110% of 2001 level		For each action area: forest acreage below 1000 feet is at least 90% of 2001 level and impervious area is not more than 120% of 2001 level		
Salmon and steelhead status and trends			Regions meeting goals			Recovery Council and NOAA Fisheries implementation review finds that the status of populations is improving and the primary factors limiting the status of populations and the ESU are decreasing.	2015	By 2055, two to four viable populations of Chinook salmon in each of five regions: Strait of Georgia, Strait of Juan de Fuca, Hood Canal, Whidbey Basin, and Central/South Puget Sound. Remaining populations and watersheds are providing ecological functions consistent with population and ESU viability.		Mary Ruckelshaus 206-860-3266
Eelgrass status and trends	Sites with increasing eelgrass area outnumber sites with decreasing area	Habitat Species/food web viability	number of sites increasing/number of sites decreasing			x sites/x sites > 1		Acreage of eelgrass in each Action Area recovers to estimated historic number of acres		Tom Momford, DNR, 902-1079
Instream flows	In wet years, instream flows exceed minimum low flow levels set by rule or other agreement		Number of watersheds							
Toxics in pelagic fish						In 2014, PBDE levels in herring from Puget Sound and Georgia Basin are not higher than levels observed in 2004		PBDE levels in Pacific herring from south and central Puget Sound are not higher than levels in herring from the Strait of Georgia		

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From: **Katie Opitz**

Comment: I would like to see parking lot car washes banned from use. Please promote the use of a professional car wash to prevent toxic waste from entering our rivers and streams.

From: **Laura Ormsby**

Comment: Dear Puget Sound Partnership,

Thank you for your hard work to develop a draft Action Agenda to restore, protect and recover Puget Sound to health by 2020. It could not come at a more pressing time, especially for the Sound's iconic and endangered orca whale. Just this month, researchers reported seven orcas "10% of the Puget Sound population" are missing and believed to be dead. Some experts say dwindling populations of endangered Chinook salmon are at least partly to blame. Is this a sign that our ecosystem is on the verge of collapsing?

The urgency of restoring the Sound to health is at a tipping point and missing orcas are the Sound's "canaries in the coal mine," telling us we are running out of time. But there is hope for the orca, as there was hope for the bald eagle, the California Condor and others on the verge of extinction. The Puget Sound Partnership's Action Agenda is a golden opportunity to do what has not been done for over 20 years- develop and implement a recovery plan that is accountable, effective, transparent and decisive with sustained funding to restore this national treasure to health by 2020.

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BUT, more than a list of Soundwide and Action Area-specific actions, the Partnership must create a real 2020 Action Agenda, not just a 2-year plan, that clearly identifies the specific actions that are needed over the next 12 years and the HOW and WHO and BY WHEN each action must be completed. All the actions need to be tied together into a comprehensive plan with measurable benchmarks and timelines in order to achieve recovery by 2020. The final Action Agenda must:

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For Puget Sound!

From: **Steffanie Ostrowski**

Comment: Dear Puget Sound Partnership,

Thank you for your commitment to developing an Action Agenda for a healthy Puget Sound. From struggling orcas to toxic chemicals in our water, the Sound needs quick and decisive action today. I want to make sure we pass a thriving Puget Sound on to future generations.

I urge the Partnership to incorporate accountability, benchmarks of success, and ample funding into this Agenda.

The draft Action Agenda includes many of the essential elements that need to be accomplished, but in addition, the final Action Agenda must also:

-Amend the Cruise Ship MOU to ban all cruise ship discharges in Puget Sound;

-Prioritize the protection and restoration of the State's forage fish spawning beds;

-Complete the Management Plan for the Cherry Point Aquatic Reserve;

-Identify adequate and sustained funding for Plan implementation;

-Update the guidance for open water dredge disposal of PCBs;

-Expand the indicator species to include forage fish abundance and harbor seal toxics loading; and

-Accelerate the restoration of the Elwha River.

Thank you for your hard work to develop a draft Action Agenda to restore, protect and recover Puget Sound to health by 2020.

On behalf of everything from eelgrass to orcas.

From: **Karalynn Ott**

Comment: Dear Puget Sound Partnership,

I am writing to urge you to improve your action agenda's recommendations on pollution prevention. Orcas, salmon, and other wildlife in Puget Sound are clearly in danger. Please help us do more to protect them - they are an invaluable local (and world) asset.

Thank you.

From: **Tracy Ouellette**

Comment: Dear Puget Sound Partnership,

As a resident of western Washington, I have Puget Sound at my doorstep and its health and my health go hand in hand. The reason I live in Washington and want to stay is the beauty and majesty of the natural world here, including our ocean and Sound. Thank you for your hard work to develop a draft Action Agenda to restore, protect and recover Puget Sound to health by 2020. It could not come at a more pressing time, especially for the Sounds iconic and endangered orca whale. Just this month, researchers reported seven orcas 10% of the Puget Sound populations are missing and believed to be dead. Some experts say dwindling populations of endangered Chinook salmon are at least partly to blame. Is this a sign that our ecosystem is on the verge of collapsing?

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For Puget Sound!

From: **Mark Overland**

Comment: Dear Mr. Dicks:

This letter is my written comment called for by your Puget Sound Partnership. I am directing my comments to your claim that Puget Sound is “sick and dying,” and the recent news report that seven southern resident killer whales died this year. Orcas may not only be the keystone Puget Sound species but harbingers of the collective future for them and us. The growing weight of scientific evidence indicates we may be out of time to save the orcas, and ourselves. As Puget Sound is dying, the world is running out of fresh water.

When Governor Dan Evans signed the Shoreline Management Act in 1971, I was working on my basic SCUBA certificate in Tacoma. I grew up around The Tacoma Narrows. When I was very young I watched killer whales playing together near me just off-shore. I do not remember how many hours I have spent underwater in Puget Sound, including the San Juan Islands. But I do remember Puget Sound dive sites in the seventies where you would be surrounded by thousands of fish. Now there are just a few left. "Buoy Bob" Foster, with 2,000 dives will tell you the same thing. I know those statements could be discounted as anecdotal, but Dr. Michele McClure, NMFS/NOAA biologist told me recently that Puget Sound "is recoverable" but we agree that the caveat remains, we out of time to take dramatic action to change our reckless collective behaviors that are racing toward the environmental collapse of our entire Puget Sound region.

In 1974, I began an essentially independent study of the killer whales as an Evergreen motion picture student. In March of 1975, I discovered the Limekiln Lighthouse on San Juan Island. Standing on the widow walk, I envisioned a listening/observation post at the lighthouse. I produced a formal scientific proposal and designed a plan for an over-underwater orca observation project in September. My principle academic advisor was neuroanatomy Professor Jonathan Sundsten at the UOW. The Whale Museum's Richard Osborne became one of my assistants at Evergreen. Ironically, several departments of the UOW supported my concept but not Evergreen. So I carried on essentially alone.

My investigation into the orca's enigmatic existence inadvertently led me to scrutinize the inhumane "live-capture killer whale fishery." Consequently I produced with Evergreen's support, The First International Orca Symposium at Evergreen, March 12th and 13th, 1976. Inconceivably, six orcas were trapped by Sea World five days before the symposium and only two miles from the Evergreen campus. The "Budd Inlet Six" were trapped by Don Goldsberry and Sea World on a cool, clear Sunday afternoon, March 7th. Underwater explosives were deployed on that pod, with a yearling, after being chased for several days.

On March 9th, I sued The Washington State Game Department in Thurston County Superior Court for release of the orcas. Dr. Victor Scheffer, the first chairman of the Marine Mammal Commission, later told me that my lawsuit was "the first of its kind."

The uncanny events that unfolded in Budd Inlet during March of 1976 resulted in the ending of orca captures in America and a transformation of our collective relationship to not only the orcas but to the land and the waters of Puget Sound. A window opened not only into these mysterious aquatic strangers, but to a greater logic of mind and nature—to consciousness. But what difference did it make? With little money to follow the trail of wonders we pioneered, most of my former associates apparently buried their heads in an obsolete, seventeenth century world view that perceived this living world as a mindless resource to be "taken" for profit. That logic was a careless national mantra in the eighties.

And now, you have declared that Puget Sound is: "sick and dying." The southern resident killer whales are probably doomed to extinction. What are we left to do? What can we do?

Over the last several years I have been working to secure what has apparently become one of the last geographically dynamic, classic upland forested wetland wildlife sanctuaries in Puget Sound. It fulfills the criteria in your draft statement calling for places just like this to be protected. Nevertheless, even after so many acts of Congress beginning with the Rivers and Harbors Act of 1899, the Clean Water Act of the 1940's, the more recent Endangered Species Act, as well as major Washington State environmental laws like The Shoreline Management Act and the Growth Management Act, the

biological treasure I am trying to save is for sale and threatened for development by Kurt Wilson's SBI LLC. Mr. Wilson has declared that he "does not care" about this environmentally fragile landscape adjacent to Pierce County's Narrows Park. This is a LID zone including nesting American bald eagles and fresh water wetlands that flow into the park and through sub—surface horizons onto the beach of The Narrows, where they fulfill the 4d rule of The Endangered Species Act, involving transiting juvenile Chinook salmon in The Narrows and the now celebrated, lethally contaminated southern resident orcas. Is it too late for them now, for the forests, the streams and the multiple living dimensions of Puget Sound that have sustained us all?

One of my advisors has been Professor James R. Karr. In his September 25th letter to you, Professor Karr and twelve of his professional colleagues outlined in three pages the environmental and social crises that are dawning for all of us in Puget Sound, and led to a kind of prayer, "…we ask that you take bold action – as Governor Gregoire has directed… Above all, we do not want to bear collective witness to another failed attempt to restore and protect Puget Sound. If we can succeed in reversing current trends, we will provide a much-needed example to the world of how a highly developed society can find a way to prosper by protecting the environment upon which it depends."

From: **Barbara Owens**

Comment: Obviously this is a huge task. I'm disappointed to see so much re-hashing of the "state of PS" because there are plenty of past reports telling us this. Also I am not sure of how much "teeth" this agenda actually has, which is what has been missing for decades. Also, given our current economic situation I'm not sure how much of the agenda is really feasible, especially all the new programs called for. It seems we could take actions to adjust existing regimes that would be less expensive or would result in income for programs. The agenda is a dizzying document to read. I look forward to seeing the "much shorter, very accessible summary" and graphics. I have several editorial suggestions regarding maintaining consistency in the language used in the document that I hope you will take note of as I believe it will make it clearer to understand and read.

1. In the introduction under "#1 What is a healthy PS" it would be helpful to state the 6 PS Recovery Goals.

2. In the Introduction under #3 the items A-E need a consistent name; I suggest "Our Sound-wide priority strategies are:"

3. In Question 3 you again use the term "strategies" to introduce items A-E; this should be changed to "Our Sound-wide priority strategies are:"

4. Each Sound-wide priority strategy has a number of "primary objectives" but aren't these actually the "near-term actions"? The name for these may need to be changed throughout the document to be clear about what these are.

5. Under Priority E you repeat the bulleted list of near-term actions". They are first presented as "key elements" and then as "primary objectives". The first list is redundant and should be eliminated.

6. In the Action area profiles section the second paragraph refers to "key issues and actions organized by the Agenda strategic priorities". Again for consistency these should be termed "the 5

priority strategies".

7. The title of the right column in the individual tables for the Action Area priorities is unclear to me. Are these the "near-term actions"? Perhaps the title should be "Action Area Priority near-term actions" or simply "Near-term actions" because the title of the table makes it clear the table is for an action area.

8. In Question 4 the Implementation table is problematic. It should state that the table lists "all of the SOUND-WIDE near-term actions" and that they "are listed in the table by PRIORITY STRATEGIES A-E".

9. The "abbreviations" table should be called an "acronym" table.

10. The Implementation table needs a title! I think it is "Implementation Table for Sound-wide near-term actions".

11. DFW, DNR, DOE and DOH are out of alphabetical order in the acronym table.

12. COE is in the financing chapter in the table of category 1 spending but is not in the acronym table.

Other comments: It is very unclear to me if the 6 "provisional indicators" are a sample subset of indicators or if this is it. The indicators don't match up with the definitions of success (outcomes). What about an indicator for increasing opportunities (# of days and locations) for recreational shellfish harvesting and recreational fishing? Or for reducing the contaminant levels in species humans eat that come from the Sound, such as Chinook salmon, rockfish and sole? The indicators seem a bit arbitrary and extremely limited.

I don't feel like the question "What are the biggest problems that we need to begin to address?" is adequately answered; unless the priority actions are meant to be the answer. If so, that is unclear.

In the Action area profiles paragraph 3 refers to "the Sound-wide table that precedes individual tables" but I do not find such a table in the document. The South Central Action Area priorities say nothing about the sockeye salmon hatchery on the Cedar River. I wonder what the plan is for this hatchery.

thank you for the opportunity to provide feedback.

From: **Gordon Padelford**

Comment: Dear Puget Sound Partnership,

Hi my name is Gordon. I'm a student and resident of Seattle. I support this message:

The Partnership staff, the Leadership Council, Ecosystem Coordinating Board, Science Panel and stakeholders throughout the Sound deserve praise for the monumental effort involved in producing the draft Action Agenda. The next step is to finalize a plan that is accountable, transparent, effective and have dedicated new funding sources to the recovery of Puget Sound by 2020.

The Partnership must create a real 2020 Action Agenda, not just a 2-year plan that clearly identifies the specific actions that are needed over the next 12 years and the HOW and WHO and BY WHEN each action must be completed. All the actions need to be tied together into a comprehensive whole

through measurable benchmarks that must be accomplished in order to achieve recovery by 2020.

Thank you for this opportunity to strengthen a strategy to save Puget Sound.

From: **Chris Page**

Comment: Dear Leadership Council,

Thank you for the opportunity to comment on the Puget Sound Partnership Draft Action Agenda. I appreciate the tremendous amount of work that has gone into developing it and I support the strong list of measures that, if implemented, will go a long way toward recovering Puget Sound by 2020.

The draft plan includes a few omissions. The final plan should include Outstanding Resource Water (ORW) designation under the Clean Water Act as a tool to help protect rivers and other aquatic habitat. While I strongly support the inclusion of Wild and Scenic designation as a similar tool, in some cases ORW designation will likely prove to be a better, more immediate way for the state to ensure the protection of high quality rivers and other waters. Therefore, I urge the Partnership to include support for the Outstanding Resource Water designation as one of its "Near Term Actions." ORW designations permanently protect high quality waters that are ecologically significant, provide cold water refuges for fish, and/or support important recreational values. Many rivers in the Puget Sound region are eligible for ORW designation. I would also like to encourage you to include funds to move up the removal of the two dams on the Elwha from 2012 to 2010. Removal of the Elwha dams is one of the best chances for salmon and steelhead recovery in the region as it will open up over 70 miles of prime spawning habitat. Removing these dams has also been as a key action to recover our Puget Sound's orca population, which is malnourished thanks to a lack of chinook salmon.

Especially during difficult financial times, finding opportunities for economic benefit and job creation is important. Removing the Elwha dams provides a tremendous opportunity for creating "green jobs" and numerous other economic benefits.

Thank you for taking my comments into consideration.

From: **Libby Palmer**

Comment: Dear Puget Sound Partnership,

Thank you for your commitment to developing an Action Agenda for a healthy Puget Sound. From struggling orcas to toxic chemicals in our water, the Sound needs quick and decisive action today. I want to make sure we pass a thriving Puget Sound on to future generations.

I urge the Partnership to incorporate accountability, benchmarks of success, and ample funding into this Agenda.

The draft Action Agenda includes many of the essential elements that need to be accomplished, but in addition, the final Action Agenda must also:

-Amend the Cruise Ship MOU to ban all cruise ship discharges in Puget Sound;

-Prioritize the protection and restoration of the State's forage fish spawning beds;

-Complete the Management Plan for the Cherry Point Aquatic Reserve;

-Identify adequate and sustained funding for Plan implementation;

-Update the guidance for open water dredge disposal of PCBs;

-Expand the indicator species to include forage fish abundance and harbor seal toxics loading; and

-Accelerate the restoration of the Elwha River.

Thank you for your hard work to develop a draft Action Agenda to restore, protect and recover Puget Sound to health by 2020.

On behalf of everything from eelgrass to orcas.

From: **Madya Panfilio**

Comment: Dear Puget Sound Partnership,

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The Partnership must create a real 2020 Action Agenda, not just a 2-year plan that clearly identifies the specific actions that are needed over the next 12 years and the HOW and WHO and BY WHEN each action must be completed. All the actions need to be tied together into a comprehensive whole through measurable benchmarks that must be accomplished in order to achieve recovery by 2020.

Thank you for this opportunity to strengthen a strategy to save Puget Sound.

From: **Adrienne Papermaster**

Comment: Dear Puget Sound Partnership,

I am writing to urge you to improve your action agenda's recommendations on pollution prevention. Please include provisions increasing the availability of technical assistance to help businesses reduce chemical use, developing a state program to focus on researching safer chemicals and materials, and requiring better industry reporting of the chemicals currently being used.

From: **Ben Park**

Comment: Dear Puget Sound Partnership,

Thank you for your commitment to developing an Action Agenda for a healthy Puget Sound. From struggling orcas to toxic chemicals in our water, the Sound needs quick and decisive action today. I want to make sure we pass a thriving Puget Sound on to future generations.

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Thank you for your hard work to develop a draft Action Agenda to restore, protect and recover Puget Sound to health by 2020.

On behalf of everything from eelgrass to orcas.

From: **Jeannie Park**

Comment: Dear Leadership Council,

Thank you for the opportunity to comment on the Puget Sound Partnership Draft Action Agenda. I appreciate the tremendous amount of work that has gone into developing it and I support the strong list of measures that, if implemented, will go a long way toward recovering Puget Sound by 2020.

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Sound's orca population, which is malnourished thanks to a lack of chinook salmon.

Especially during difficult financial times, finding opportunities for economic benefit and job creation is important. Removing the Elwha dams provides a tremendous opportunity for creating "green jobs" and numerous other economic benefits.

Thank you for taking my comments into consideration.

From: **Stan Parker**

Comment: Dear Puget Sound Partnership,

Thank you for your hard work to develop a draft Action Agenda to restore, protect and recover Puget Sound to health by 2020. It could not come at a more pressing time, especially for the Sound's iconic and endangered orca whale. Just this month, researchers reported seven orcas "10% of the Puget Sound population" are missing and believed to be dead. Some experts say dwindling populations of endangered Chinook salmon are at least partly to blame. Is this a sign that our ecosystem is on the verge of collapsing?

The urgency of restoring the Sound to health is at a tipping point and missing orcas are the Sound's "canaries in the coal mine," telling us we are running out of time. But there is hope for the orca, as there was hope for the bald eagle, the California Condor and others on the verge of extinction. The Puget Sound Partnership's Action Agenda is a golden opportunity to do what has not been done for over 20 years- develop and implement a recovery plan that is accountable, effective, transparent and decisive with sustained funding to restore this national treasure to health by 2020.

The draft Action Agenda includes many of the essential elements that need to be done:

-Require low-impact development to reduce stormwater pollution;

-Prohibit new bulkheads near feeder bluffs and forage fish spawning beaches;

-Fund local governments to develop and carry out shoreline master programs;

-Fund enforcement staff at state agencies and local governments;

-Implement specific, aggressive cleanup plans for polluted waters, including TMDLs;

-Fully fund a permanent year-round rescue tug at Neah Bay for oil spill prevention;

-Acquire critical intact parcels for habitat protection and conservation;

-Set strong requirements for water quantity, such as setting in-stream flow for all major rivers.

BUT, more than a list of Soundwide and Action Area-specific actions, the Partnership must create a real 2020 Action Agenda, not just a 2-year plan, that clearly identifies the specific actions that are needed over the next 12 years and the HOW and WHO and BY WHEN each action must be completed. All the actions need to be tied together into a comprehensive plan with measurable benchmarks and timelines in order to achieve recovery by 2020. The final Action Agenda must:

-Clearly identify timelines and responsibilities;

-Identify adequate and sustained funding for the long haul;

-Be a visionary and long term plan;

-Be based on science;

-Offer a comprehensive and robust program to prevent all sources of stormwater pollution, not just municipal stormwater;

-Strengthen the list of actions for toxic pollution prevention;

-Set meaningful standards for habitat protection;

-Balance regulatory change with land acquisition to accomplish long term recovery goals;

-Expand the indicator species to include more than just salmon, i.e. forage fish, harbor seals, etc.

The Partnership staff, the Leadership Council, Ecosystem Coordinating Board, Science Panel and stakeholders throughout the Sound deserve praise for the monumental effort involved in producing the draft Action Agenda. The next step is secure much needed funding. The 2009 legislature must adopt new funding sources dedicated to the recovery of Puget Sound by 2020.

For Puget Sound!

From: **Sandra Parker-Stetter**

Comment: Beyond being suggested as an indicator of toxic contamination, forage species are mentioned within the "Draft 2020 Action Agenda for Puget Sound" primarily within the context of prey for salmonids. Unfortunately, little is known about forage fish (demersal or pelagic) population abundance or distributions within Puget Sound. In order to achieve PSP goals of improving salmonid population viability, an inventory of prey resources is a necessary step. Additionally, given that forage species represent the important middle of the ecosystem, they should be identified as a focal group with measurable indicators of knowledge and success. My comments that follow suggest ways to explicitly include forage fish in the Draft Agenda. Question 2 addresses the status of, and threats to, Puget Sound. "Harvest" is recognized as a potential threat to forage species, mentioning incidental harvest of hake, etc. But, no mention is made of future (and currently growing) interest in directed commercial or recreational catches of forage species in the Sound. Question 3 outlines steps to a healthy Sound. But to protect, restore, etc. presumes that you know what resources are available. Unfortunately, little quantitative information exists on demersal or pelagic non-salmonid fish in Puget Sound. Part E "Build and implement the new system" touches on this, but needs to explicitly include quantitative censuses of forage resources. Such surveys should be comparable, in scope, technology, and approach, to those used in other aquatic ecosystems. Priority A does include forage fish population viability and related effects on predator populations. But, A.1 near-term strategies should include an evaluation of forage distribution - how else can critical habitat, that encompasses all life stages, be determined? Priority D includes planning, implementing, and decision-making within an ecosystem framework (D.1) and mentions sustainable fishing plans for salmonid and non-salmonid fisheries. Baseline information on forage fish is necessary to meet this goal in light of current, and potential, non-salmonid

commercial and recreational fishing. Priority E's discussion of a comprehensive prioritized regional science plan should explicitly include forage species (E.3.1-E.3.2) given the other priorities throughout the Draft Agenda. Similarly, E.3 near-term actions #6-9 should follow the focus of #10 and include lower trophic level components. The South Sound draft action area priority includes forage fish, but no other areas have an obvious forage species focus. Given concerns about herring in areas other than South Sound, and the potential important of sand lance and anchovy in the Puget Sound ecosystem, other action areas should also include forage species projects that are coordinated with work in South Sound. Adding forage fish studies to all draft action area priorities also complements the salmonid restoration work that is proposed throughout the Sound. Within the Implementation table, there is no mention of the role of academic partners. Given the expertise and resources that exist at academic institutions in Puget Sound, academia should play a prevalent role, and be an active partner, in meeting the 2020 PSP objectives.

From: **Dave Parks**

Comment: Please add the Port Angeles Landfill/Dry Creek slope stabilization/water quality monitoring/remediation project and Twin Rivers mole removal/property acquisition projects to the Puget Sound Partnership action agenda.

For the Twins project reference Shaffer and Ritchie, 2008. Fish use of Twins Nearshore. Washington Department of Natural Resources.

"The high density of smelt observed along the Twins nearshore is consistent with the documented surf smelt spawning for this area. While primarily passively used, the area is very popular for launching of boats for crabbing and smelting, and is adjacent to private recreational property. Management care should be taken to preserve this high quality and function beach. Vehicle driving on the beach should be prohibited and shoreline alterations along the Twins should be avoided. The Twins nearshore should be a priority for acquisition, and restoration. Managers should work with local partners to remove the derelict mole structure on adjacent public and private property."

For the Port Angeles Landfill project see http://drycreekcommunity.org/index.php/coalition/C19/ &lthttp://drycreekcommunity.org/index.php/coalition/C19/&gt

From: **Geov Parrish**

Comment: Dear Puget Sound Partnership,

The Partnership staff, the Leadership Council, Ecosystem Coordinating Board, Science Panel and stakeholders throughout the Sound deserve praise for the monumental effort involved in producing the draft Action Agenda. The next step is to finalize a plan that is accountable, transparent, effective and have dedicated new funding sources to the recovery of Puget Sound by 2020.

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Thank you for this opportunity to strengthen a strategy to save Puget Sound.

From: **Stephanie Parrott**

Comment: Dear Puget Sound Partnership,

Thank you for tackling the enormous challenge of saving Puget Sound head on. We appreciate your boldness and your efforts to engage the broader community, to listen to us and to base your decisions on science.

Surfrider Foundation is committed to supporting your efforts, primarily by encouraging people to get out in the watershed and into the Sound, to enjoy it, to appreciate it and to take action to protect and restore it. Through projects like Rise Above Plastics, beach clean ups and ocean friendly gardens, we will do our best to promote Sound stewardship practices.

In order to make sure that we reach our goal of a healthy Puget Sound by 2020, we ask that you strengthen the Action Agenda by incorporating the following recommendations:

- Be stronger on water quality measures by offering a comprehensive and robust program to prevent all sources of stormwater pollution and strengthening the list of actions for toxic pollution prevention.

- Develop different indicators for human well-being to include more opportunity for quality water-based recreation through increased shoreline access, clean beaches, and clean water.

- Be stronger on accountability by incorporating clear benchmarks to get us to a healthy Puget Sound by 2020.

- Create more opportunities and stronger protection programs to improve the public's interaction with the shoreline and achieve enough water quality improvement and habitat restoration to inspire the public to go to the water's edge more frequently.

- Ensure that there is enough funding for Puget Sound to achieve the goals laid out in this ambitious agenda.

Thank you for your hard work to develop a draft Action Agenda to restore, protect and recover Puget Sound to health by 2020.

From: **Tamara Parrott**

Comment: Dear Puget Sound Partnership,

I am writing to urge you to improve your action agenda's recommendations on pollution prevention.

From: **Sharon Parshall**

Comment: Dear Puget Sound Partnership,

I urge you to improve your action agenda's recommendations on pollution prevention.

From: **Melissa Parson**

Comment: Dear Puget Sound Partnership,

I am writing to urge you to improve your action agendas recommendations on pollution prevention. We are all interconnected. Please help do something to take care of the animals in puget sound

From: **Donna Passmore**

Comment: Dear Puget Sound Partnership,

The Partnership staff, the Leadership Council, Ecosystem Coordinating Board, Science Panel and stakeholders throughout the Sound deserve praise for the monumental effort involved in producing the draft Action Agenda. The next step is to finalize a plan that is accountable, transparent, effective and have dedicated new funding sources to the recovery of Puget Sound by 2020.

The Partnership must create a real 2020 Action Agenda, not just a 2-year plan that clearly identifies the specific actions that are needed over the next 12 years and the HOW and WHO and BY WHEN each action must be completed. All the actions need to be tied together into a comprehensive whole through measurable benchmarks that must be accomplished in order to achieve recovery by 2020.

Thank you for this opportunity to strengthen a strategy to save Puget Sound.

From: **David Pater**

Comment: Questions 3 Page 10 A-2 Near term actions #7 states the following: "Change Shoreline Management Act statutes and regulations to require a shoreline conditional use permit for bulkheads and docks associated with all residential development; for all new shoreline hardening; for all seawall/bulkhead/revetment repair projects; and for new docks and piers. Changes should be made to require soft armoring techniques be used where new armoring or retrofits are unavoidable. No-net-loss of shoreline function should be required and new shoreline hardening should be prohibited in areas with feeder bluffs. New over water structures or shoreline hardening in the vicinity of forage fish spawning areas and eel grass beds should also be restricted." A more effective approach for deading with Bulkheads and overwater structures would be the following: -Remove the permit exemption under WAC 173-27-040 - Require an approach similar to mitigation sequencing that makes it more difficult to install new piers and bulkheads. State Shoreline Master Program guidelines have requirements under WAC 173-27-231 that restrict new and replacement bulkheads. The implementation of these standards need to be emphasized. _ SMP guidelines don't have similar restrictions for piers and docks. Emphasizing US Army Corps Regional general permit standards, in addition to encoruaging joint use would help reduce over water structure impacts. - The above items can be implemented just as effectively through a shoreline substantial development permit as a conditional use permit(CUP). Requiring a CUP for bulkheads, docks and piers would require funds for hiring additional Dept. of Ecology staff to review CUP's. The Ecology workload would signficantly increase if this item is fully

implemented.

From: **Jean Pauley**

Comment: Dear Puget Sound Partnership,

I am writing to urge you to improve your action agenda's recommendations on pollution prevention.

From: **Jean Pauley**

Comment: Dear Puget Sound Partnership,

Thank you for your hard work to develop a draft Action Agenda to restore, protect and recover Puget Sound to health by 2020. When it comes to restoring the health of the Puget Sound, where and how we grow matters. Especially in light of the one million new residents the state expects to welcome by 2020. It's more crucial than ever to focus that growth inside our urban areas so that we can preserve our farm and forest land and protect our rural areas to restore critical habitats and watersheds of the Sound.

While I applaud your effort thus far, the Action Agenda can and must go farther. We need a twenty year plan, not a two year plan. All the actions need to be tied together into a comprehensive plan with measurable benchmarks and timelines in order to achieve recovery by 2020.

As you finalize the final Action Agenda, please:

-Balance regulatory change with land acquisition to accomplish long term recovery goals;

-Take advantage of the region's recent vote to build 34 miles of new light rail - we must capitalize on this investment by requiring more intense development near these station areas that are pedestrian, bicycle and transit friendly;

-Identify adequate and sustained funding for the long haul;

-Clearly identify timelines and responsibilities;

-Be based on science;

-Set meaningful standards for habitat protection.

The Partnership staff, the Leadership Council, Ecosystem Coordinating Board, Science Panel and stakeholders throughout the Sound deserve praise for the monumental effort involved in producing the draft Action Agenda. The next step is secure much needed funding. The 2009 legislature must adopt new funding sources dedicated to the recovery of Puget Sound by 2020.

For Puget Sound!

From: **Bradley Pavlik**

Comment: I understand this is a policy document but if you want valuable feedback from lay citizens and experts please simplify your format or at least include a TABLE OF CONTENTS! Two weeks is not enough time to get quality feedback on a 100 page document. In terms of the priority areas I would like to see stronger regulation in the form or incentives or disincentives for managing stormwater through green infrastructure. The language of the federal NPDES program on stormwater is not strong enough and in the puget sound we need stronger legal language to protect our water quality. We look to the state legislature and your agency to give specific requirements to be met. Reducing pollutants to the "maximum extent practicable" will not cut it. Thanks

From: **Vernon Pearia**

Comment: Dear Puget Sound Partnership,

Thank you for tackling the enormous challenge of saving Puget Sound head on. We appreciate your boldness and your efforts to engage the broader community, to listen to us and to base your decisions on science.

Surfrider Foundation is committed to supporting your efforts, primarily by encouraging people to get out in the watershed and into the Sound, to enjoy it, to appreciate it and to take action to protect and restore it. Through projects like Rise Above Plastics, beach clean ups and ocean friendly gardens, we will do our best to promote Sound stewardship practices.

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- Be stronger on accountability by incorporating clear benchmarks to get us to a healthy Puget Sound by 2020.

- Create more opportunities and stronger protection programs to improve the public's interaction with the shoreline and achieve enough water quality improvement and habitat restoration to inspire the public to go to the water's edge more frequently.

- Ensure that there is enough funding for Puget Sound to achieve the goals laid out in this ambitious agenda.

Thank you for your hard work to develop a draft Action Agenda to restore, protect and recover Puget Sound to health by 2020.

From: **Herb Pearse**

Comment: The Action Agenda needs to have a mechanism to test and evaluate new technologies that will lead to a cleaner and more healthy sound, especially for small-businesses and private individuals how don't

have the resources to put on a big "PR" campaign.

From: **Herb Pearse**

Comment: I have read the Draft Action Agenda and I found it to be a summary of some of the environmental issues that have been plaguing Puget Sound for many years and an attempt to address these issues through balanced regulation, property protection, monitoring, and ongoing study.

In Question 2 / Page 1, second paragraph, it is stated that just since 1985 we have "spilled at least 230,000 gallons of oil and hazardous waste". "At least" are the operative words here in that the Washington State Department of Ecology completed a report, "Phase 1: Initial Estimate of Toxic Chemical Loadings to Puget Sound", October 2007, Publication Number 07-10-079 which provided data indicating that petroleum product releases to Puget Sound are on a scale with the equivalent to a Valdez Oil Spill every year to year and a half. It is not as noticeable as the Valdes Oil Spill since it happens gradually as opposed to happening as one event. I thought that this point needs to strike home with the population in general so that the perception changes from "oh, it's just an oil sheen" to one of more direct concern.

It was my hope in reading the Draft Action Agenda that I would find some indication (other than the casual mentioning of "innovative technologies" in section C.1 of Question 3 / Page 20) that there would be a focus on discovering and "mandating" the implementation of the best available technology to address specific contamination issues. There are highly effective, innovative technologies now available that are awaiting implementation. Most technologies that are predominantly used are the same technologies that have proven ineffective at properly addressing the prevailing environmental contamination issues. A major issue in Puget Sound is obviously petroleum contamination in runoff waters. The general consensus is that oil sheen (part of the Valdez Oil Spill equivalent)cannot effectively be removed from water.

There is a technology that consists of a fabric that is made from waste fibers from the textile manufacturing industry that when water flows through the fabric the oil and oil sheen are effectively removed down to between 2 and 4 mg/L residual oil in the water. To put that in perspective, oil generally becomes visible (oil sheen) on water at between 8 and 12 mg/L. This fabric does not degrade in the environment thus it will maintain its functionality indefinitely. Oil sheen can effectively be physically removed from water so please keep that I mind the next time you hear the comment made that "the oil sheen was not recoverable". A simple means to address the petroleum contamination runoff issue is to direct as much of the runoff water as possible, from areas where petroleum concentrations occur, through this fabric to remove the oils prior to discharge into bodies of water. A relatively simple and cost effective process. As a point of possible interest, this technology in April of 2007, at the European Parliament in Brussels Belgium, was presented both the National and the International Energy Globe Awards for Sustainability in Water. Governor Gregoire and Congressman Norm Dicks have provided letters of congratulation.

Having been an environmental remediation contractor for over 25 years, I have found that some study of a contamination issue is a good thing, but too much study without associated action allows the issue to prevail. I would hope that the Puget Sound Partnership focuses more on taking the "action" that is urgently needed rather than focusing its efforts on unlimited study.

From: **Mary Pease**

Comment: Dear Puget Sound Partnership,

Thank you for your commitment to developing an Action Agenda for a healthy Puget Sound. From struggling orcas to toxic chemicals in our water, the Sound needs quick and decisive action today. I want to make sure we pass a thriving Puget Sound on to future generations.

I urge the Partnership to incorporate accountability, benchmarks of success, and ample funding into this Agenda.

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-Expand the indicator species to include forage fish abundance and harbor seal toxics loading; and

-Accelerate the restoration of the Elwha River.

Thank you for your hard work to develop a draft Action Agenda to restore, protect and recover Puget Sound to health by 2020.

On behalf of everything from eelgrass to orcas.

From: **Webster Peirce**

Comment: Section A.2.7 addresses the lack of Shoreline Management Act regulation of single-family residence bulkheads, one of the most significant obstacles to restoration of the Sound in my opinion. As a consultant, I begrudgingly apply for permits on these bulkheads, and every time I am reminded of how hobbled WDFW, Ecology, and the local juresdictions are in resisting this hardening of the Sound's shoreline. It is quite simple: since the 90's, the legistlature (RCW 77.55.141 and RCW 220.110.285) has required permits be granted for bulkheads that "do not result in the permanent loss of critical food fish or shellfish habitats." Invariably, this results in weak agreements to add regular sand/gravel "beach enhancement," ostensibly replacing lost eroding bank material. In the end, these agreements are forgotten and the bank is left hardened, the beach down-cell devoid of spawning sands. We need to put the proponents on the defensive: require that erosion protection is only as hard as it needs to be to slow erosion to an acceptable rate (e.g. Seattle SSDP requirements a la Maggie Glowacki). And let it be acceptible to lose some lawn over time. Let them show that critical unreplacable functions and values of their lawn are at risk rather than the other way around. This is shared space, these shorelines. Every new owner should know that the 200 feet of land adjacent to a shoreline is not

their's alone to manage. I support Conditional Use Permits for all bulkhead work and putting some teeth in the SMA so that Ecology can use their regulatory position to resist in those cases where it matters most.

From: **Kim Pendergrass**

Comment: Dear Puget Sound Partnership,

this email comes to urge you to improve your action agendas recommendations on pollution prevention.

WA state spends much money on cleaning up pollution and on health care costs treating diseases linked to environmental pollutants. Somehow, the polluters continue doing what they do and contaminate our waters, eco-systems, and us, without paying for the true cost of deeds. We are over due in making some effective changes.

The current draft of the action plan does not include provisions that will help move Washington's businesses toward safer alternatives and away from chemicals known to be harmful. These proposals should include increasing the availability of technical assistance to help businesses reduce chemical use, developing a state program to focus on researching safer chemicals and materials, and requiring better industry reporting of the chemicals currently being used.

Thank you for your time and consideration in the above.

From: **Kim Pendergrass**

Comment: Dear Puget Sound Partnership,

Thank you for your hard work to develop a draft Action Agenda to restore, protect and recover Puget Sound to health by 2020. It could not come at a more pressing time, especially for the Sound's iconic and endangered orca whale. Just this month, researchers reported seven orcas "10% of the Puget Sound population" are missing and believed to be dead. Some experts say dwindling populations of endangered Chinook salmon are at least partly to blame. Is this a sign that our ecosystem is on the verge of collapsing?

The urgency of restoring the Sound to health is at a tipping point and missing orcas are the Sound's "canaries in the coal mine," telling us we are running out of time. But there is hope for the orca, as there was hope for the bald eagle, the California Condor and others on the verge of extinction. The Puget Sound Partnership's Action Agenda is a golden opportunity to do what has not been done for over 20 years- develop and implement a recovery plan that is accountable, effective, transparent and decisive with sustained funding to restore this national treasure to health by 2020.

The draft Action Agenda includes many of the essential elements that need to be done:

-Require low-impact development to reduce stormwater pollution;

-Prohibit new bulkheads near feeder bluffs and forage fish spawning beaches;

-Fund local governments to develop and carry out shoreline master programs;

-Fund enforcement staff at state agencies and local governments;

-Implement specific, aggressive cleanup plans for polluted waters, including TMDLs;

-Fully fund a permanent year-round rescue tug at Neah Bay for oil spill prevention;

-Acquire critical intact parcels for habitat protection and conservation;

-Set strong requirements for water quantity, such as setting in-stream flow for all major rivers.

BUT, more than a list of Soundwide and Action Area-specific actions, the Partnership must create a real 2020 Action Agenda, not just a 2-year plan, that clearly identifies the specific actions that are needed over the next 12 years and the HOW and WHO and BY WHEN each action must be completed. All the actions need to be tied together into a comprehensive plan with measurable benchmarks and timelines in order to achieve recovery by 2020. The final Action Agenda must:

-Clearly identify timelines and responsibilities;

-Identify adequate and sustained funding for the long haul;

-Be a visionary and long term plan;

-Be based on science;

-Offer a comprehensive and robust program to prevent all sources of stormwater pollution, not just municipal stormwater;

-Strengthen the list of actions for toxic pollution prevention;

-Set meaningful standards for habitat protection;

-Balance regulatory change with land acquisition to accomplish long term recovery goals;

-Expand the indicator species to include more than just salmon, i.e. forage fish, harbor seals, etc.

The Partnership staff, the Leadership Council, Ecosystem Coordinating Board, Science Panel and stakeholders throughout the Sound deserve praise for the monumental effort involved in producing the draft Action Agenda. The next step is secure much needed funding. The 2009 legislature must adopt new funding sources dedicated to the recovery of Puget Sound by 2020.

For Puget Sound!

From: **Dennis Pennell**

Comment: Dear Leadership Council,

Thank you for the opportunity to comment on the Puget Sound Partnership Draft Action Agenda. I appreciate the tremendous amount of work that has gone into developing it and I support the strong

list of measures that, if implemented, will go a long way toward recovering Puget Sound by 2020.

The draft plan includes a few omissions. The final plan should include Outstanding Resource Water (ORW) designation under the Clean Water Act as a tool to help protect rivers and other aquatic habitat. While I strongly support the inclusion of Wild and Scenic designation as a similar tool, in some cases ORW designation will likely prove to be a better, more immediate way for the state to ensure the protection of high quality rivers and other waters. Therefore, I urge the Partnership to include support for the Outstanding Resource Water designation as one of its "Near Term Actions." ORW designations permanently protect high quality waters that are ecologically significant, provide cold water refuges for fish, and/or support important recreational values. Many rivers in the Puget Sound region are eligible for ORW designation. I would also like to encourage you to include funds to move up the removal of the two dams on the Elwha from 2012 to 2010. Removal of the Elwha dams is one of the best chances for salmon and steelhead recovery in the region as it will open up over 70 miles of prime spawning habitat. Removing these dams has also been as a key action to recover our Puget Sound's orca population, which is malnourished thanks to a lack of chinook salmon.

Especially during difficult financial times, finding opportunities for economic benefit and job creation is important. Removing the Elwha dams provides a tremendous opportunity for creating "green jobs" and numerous other economic benefits.

Thank you for taking my comments into consideration.

From: **Sarah Perkins**

Comment: Dear Puget Sound Partnership,

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For Puget Sound!

From: **Andrea Perry**

Comment: Dear Puget Sound Partnership,

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verge of collapsing?

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The Partnership staff, the Leadership Council, Ecosystem Coordinating Board, Science Panel and

stakeholders throughout the Sound deserve praise for the monumental effort involved in producing the draft Action Agenda. The next step is secure much needed funding. The 2009 legislature must adopt new funding sources dedicated to the recovery of Puget Sound by 2020.

For Puget Sound!

From: **Matthew Peters**

Comment: While the actions and goals outlined by the partnership are commendable, a more holistic approach to "stopping" point source and non-point source pollution needs to begin at the input side, not just the pipe side. Taxing harmful chemicals that the partnership is trying to keep out of the sound would increase government revenues (and diversifying our current sales tax heavy tax-base), raise money to offset the tax incentives that are being discussed for property owners who manage their land in an environmentally friendly manner, make the buyers of harmful pollutants pay a "real cost" (internalize the externalities), and reduce the overall toxicity of our society. Let us start at the source of the problem, and instead of trying to keep harmful pollutants from reaching our Sound we should try to keep them from reaching our entire society. Please act with some more holistic thinking.

From: **Thom Peters**

Comment: Dear Puget Sound Partnership,

Thank you for your commitment to developing an Action Agenda for a healthy Puget Sound. From struggling orcas to toxic chemicals in our water, the Sound needs quick and decisive action today. I want to make sure we pass a thriving Puget Sound on to future generations.

I urge the Partnership to incorporate accountability, benchmarks of success, and ample funding into this Agenda.

The draft Action Agenda includes many of the essential elements that need to be accomplished, but in addition, the final Action Agenda must also:

-Amend the Cruise Ship MOU to ban all cruise ship discharges in Puget Sound;

-Prioritize the protection and restoration of the State's forage fish spawning beds;

-Complete the Management Plan for the Cherry Point Aquatic Reserve;

-Identify adequate and sustained funding for Plan implementation;

-Update the guidance for open water dredge disposal of PCBs;

-Expand the indicator species to include forage fish abundance and harbor seal toxics loading; and

-Accelerate the restoration of the Elwha River.

Thank you for your hard work to develop a draft Action Agenda to restore, protect and recover Puget Sound to health by 2020.

On behalf of everything from eelgrass to orcas.

From: **John Petersen**

Comment: I am writing to urge you to improve your action agenda's recommendations on pollution prevention.

From: **Beverlee Peterson**

Comment: Dear Puget Sound Partnership,

Our beloved Puget Sound is in critical condition. If we don't get a workable plan in place to reverse the conditions very soon, we may be administering last rites.

The next step is to finalize a plan that is accountable, transparent, effective and have dedicated new funding sources to the recovery of Puget Sound by 2020.

The Partnership must create a real 2020 Action Agenda, not just a 2-year plan that clearly identifies the specific actions that are needed over the next 12 years and the HOW and WHO and BY WHEN each action must be completed. All the actions need to be tied together into a comprehensive whole through measurable benchmarks that must be accomplished in order to achieve recovery by 2020.

Thank you for this opportunity to strengthen a strategy to save Puget Sound.

From: **Peggy Peterson**

Comment: Dear Puget Sound Partnership,

The Partnership staff, the Leadership Council, Ecosystem Coordinating Board, Science Panel and stakeholders throughout the Sound deserve praise for the monumental effort involved in producing the draft Action Agenda. The next step is to finalize a plan that is accountable, transparent, effective and have dedicated new funding sources to the recovery of Puget Sound by 2020.

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From: **Christina Petrie**

Comment: Dear Puget Sound Partnership,

I am writing to urge you to improve your action agenda's recommendations on pollution prevention.

From: **Judy Pickens**

Comment: From the perspective of a small urban-creek watershed (Fauntleroy), I appreciate the action agenda's comprehensive approach; all facets must be addressed. Our biggest challenge is stormwater, both direct runoff and historic outfalls into Fauntleroy Cove that (among other things) contribute nutrients that feed our summer stench (ulva blooms). CSOs are of comparable concern. The problem is far bigger than we and our agency partners can solve with public education. Until significant investments can be made in infrastructure, we can only nibble around the edges of these problems. I look forward to working with the Partnership to do much more.

From: **B.A. Pieplow-Galeu**

Comment: Dear Puget Sound Partnership,

I am writing to urge you to improve your action agenda's recommendations on pollution prevention.

Washington state spends tens of millions of dollars each year cleaning up pollution and billions of dollars each year in health care costs treating diseases linked to environmental pollutants. Yet, at the same time polluters continue to use toxic chemicals that contaminate Puget Sound and our bodies, without paying for the true cost of their pollution. It's time wildlife and taxpayers got off this toxic treadmill.

The current draft of the action plan does not include provisions that will help move Washington's businesses toward safer alternatives and away from chemicals known to be harmful. These proposals should include increasing the availability of technical assistance to help businesses reduce chemical use, developing a state program to focus on researching safer chemicals and materials, and requiring better industry reporting of the chemicals currently being used.

Please take this seriously, many people are already chemically sensitive and the same is happening to the animals. Please take notice now and strenghten the proposals instead of weakening them.

From: **Judy Pigott**

Comment: Dear Puget Sound Partnership,

Thank you for your hard work to develop a draft Action Agenda to restore, protect and recover Puget Sound to health by 2020. It could not come at a more pressing time, especially for the Sound's iconic and endangered orca whale. Just this month, researchers reported seven orcas "10% of the Puget Sound population" are missing and believed to be dead. Some experts say dwindling populations of endangered Chinook salmon are at least partly to blame. Is this a sign that our ecosystem is on the verge of collapsing?

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“canaries in the coal mine,” telling us we are running out of time. But there is hope for the orca, as there was hope for the bald eagle, the California Condor and others on the verge of extinction. The Puget Sound Partnership’s Action Agenda is a golden opportunity to do what has not been done for over 20 years- develop and implement a recovery plan that is accountable, effective, transparent and decisive with sustained funding to restore this national treasure to health by 2020.

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new funding sources dedicated to the recovery of Puget Sound by 2020.

For Puget Sound!

From: **Kathryn Piland**

Comment: Dear Puget Sound Partnership,

The Partnership staff, the Leadership Council, Ecosystem Coordinating Board, Science Panel and stakeholders throughout the Sound deserve praise for the monumental effort involved in producing the draft Action Agenda. The next step is to finalize a plan that is accountable, transparent, effective and have dedicated new funding sources to the recovery of Puget Sound by 2020. The health of our beautiful sound is as important to our quality of life as it is critical to the creatures living in it.

The Partnership must create a real 2020 Action Agenda, not just a 2-year plan that clearly identifies the specific actions that are needed over the next 12 years and the HOW and WHO and BY WHEN each action must be completed. All the actions need to be tied together into a comprehensive whole through measurable benchmarks that must be accomplished in order to achieve recovery by 2020. Paraphrasing the great man for whom Seattle was named, "all things are connected, what befalls nature will one day be our fate." The time is now for the fate of our sound's inhabitants, and in time our own.

Thank you for this opportunity to strengthen a strategy to save Puget Sound.

From: **Deborah Platz**

Comment: Dear Puget Sound Partnership,

Thank you for tackling the enormous challenge of saving Puget Sound head on. We appreciate your boldness and your efforts to engage the broader community, to listen to us and to base your decisions on science.

Surfrider Foundation is committed to supporting your efforts, primarily by encouraging people to get out in the watershed and into the Sound, to enjoy it, to appreciate it and to take action to protect and restore it. Through projects like Rise Above Plastics, beach clean ups and ocean friendly gardens, we will do our best to promote Sound stewardship practices.

In order to make sure that we reach our goal of a healthy Puget Sound by 2020, we ask that you strengthen the Action Agenda by incorporating the following recommendations:

- Be stronger on water quality measures by offering a comprehensive and robust program to prevent all sources of stormwater pollution and strengthening the list of actions for toxic pollution prevention.

- Develop different indicators for human well-being to include more opportunity for quality water-based recreation through increased shoreline access, clean beaches, and clean water.

- Be stronger on accountability by incorporating clear benchmarks to get us to a healthy Puget Sound

by 2020.

- Create more opportunities and stronger protection programs to improve the public's interaction with the shoreline and achieve enough water quality improvement and habitat restoration to inspire the public to go to the water's edge more frequently.

- Ensure that there is enough funding for Puget Sound to achieve the goals laid out in this ambitious agenda.

Thank you for your hard work to develop a draft Action Agenda to restore, protect and recover Puget Sound to health by 2020.

From: **Allen Pleus**

Comment: These comments are based on my expertise as the WDFW Aquatic Invasive Species Coordinator, Alternate on the Invasive Species Council, and Chair of the Aquatic Nuisance Species Committee, Ballast Water Work Group, and the Tunicate Response Advisory Committee. The following recommended changes/additions to the action agenda are offered to provide greater consistency, accountability, and clarity to the problems of invasive species as already identified in the agenda.

Introduction - Page 3: "Inside the Action Agenda" - bullet 3 - ADD TEXT to emphasize a significant threat as noted in question 2 and question 3 - priority A.5. A. Protect the intact ecosystem processes, structures, and functions that sustain Puget Sound. Avoiding problems before they occur "and preventing the introduction of invasive species at their pathway sources are" the best and most cost-effective approach to ecosystem health.

Introduction - Page 7: "What can people do now to help?" ADD NEW PARAGRAPH to emphasize key citizen actions for dealing with invasive species. "Invasive Species What invasive species released or hitchhike on your ship, boat or gear will be introduced or spread into Puget Sound" Retain, exchange or treat ballast water before discharging

Clean, drain, and dry boat hulls and raw water holds

Clean and dry all camping, fishing, and hunting equipment before entering a new area â€¢ Never release pets or animals into areas they can escape or directly into the wild

Question 1- Page 4: "How will we hold ourselves accountable? Indicators and benchmarks“ ADD NEW ROW ON TABLE to promote accountability for invasive species with indicators and benchmarks.

Column 1: "Invasive species status and trends"

Column 2: "The number of new invasive species introduced each year has declined significantly"

Column 3: "Baseline invasive species survey completed by 2010; All vessels will meet or exceed state or national ballast water performance standards by 2016"

Question 2 Page 6: Other threats due to invasive species, artificial propagation, harvest and other activities:

ADD TEXT that illustrates the magnitude of the ballast water problem and how tunicates have invaded Puget Sound. "...threats from invasive species vary across the Puget Sound action areas. Vessels annually discharge the equivalent of 41,542 railroad grain cars (a train stretching from the Pacific coast to the Idaho boarder) of ballast water into Puget Sound that contain innumerable species from around the world. Purple loosestrife, Spartina species, knotweed, Scotch broom and other invasive plants are here now and could transform estuaries and river corridors. Tunicates are invading marine waters &lt&ltand are now found in over 50 locations. Domesticated animals can transmit potentially fatal diseases to native species.

Question 3 Page 1: "What actions should be taken"

ADD TEXT for consistency with introduction. A. Protect the intact ecosystem processes, structures, and functions that sustain Puget Sound. Avoiding problems before they occur "and preventing the introduction of invasive species at their pathway sources are" the best and most cost-effective approach to ecosystem health.

Question 3 Page 14: A.5 Near-term Actions

ADD TEXT AND NEW BULLETS to correct errors, address reference to tunicates in previous sections of the agenda, and address what is mean by the A.5 title to "rapidly respond" to invasive species. #4 addresses the continuation a currently PSP-funded program for tunicates.

2. &lt&ltEnhance&gt&gt the Department of Fish and Wildlife ballast water regulatory compliance monitoring &lt&ltprogram&gt&gt.

4. Continue to support and enhance the Department of Fish & Wildlifeâ€™s tunicate response program.

5. Develop a team at the Department of Fish & Wildlife to lead rapid response actions for new introductions of invasive species.

Question 3 Page 33: D.3 Near-term Actions

ADD NEW BULLET to identify and support a critical partnership for dealing with invasive species.

8. Continue and expand collaboration with and support to the Invasive Species Council and its partners including the Aquatic Nuisance Species Committee, Noxious Weed Control Board, Ballast Water Work Group, Tunicate Response Advisory Committee, and others.

Question 3 Page 37: D.5 Near-term Actions

ADD NEW BULLETS to address the need to improve existing critical regulations with ongoing management programs.

6. Continue to support and enhance the Department of Fish & Wildlife's ballast water management program.

7. Continue to support and enhance the Department of Fish & Wildlife's tunicate response program.

8. Develop a team at the Department of Fish & Wildlife to lead rapid response actions for new

introductions of invasive species.

Question 4 Page 3?: A.5 Prevent and rapidly respond to the introduction of new invasive species

MODIFY & ADD

1 "Advocate..." Lead agency is DFW - not DOE; move DOE to Partners column. 2 "Implement..." Change "Implement" to "Enhance" and remove "(new)" from Program

3 "Develop..." Add "Funding" to Partnership Role column; add "DFW" as Lead Agency; add "Invasive Species Council, DOE, USGS" to Partners column NEW

4. Continue to support and enhance the Department of Fish & Wildlife's tunicate response program; Program; Funding; DFW; DOE, DNR, USFWS NEW

5. Develop a team at the Department of Fish & Wildlife to lead rapid response actions for new introductions of invasive species; Program (new); Funding; DFW; DOE, DNR, USFWS, Invasive Species Council

Question 4 Page 5?: D.3 Build and sustain long-term capacity of partners to effectively and efficiently implement the Action Agenda

ADD NEW BULLET

8. Continue and expand collaboration with and support to the Invasive Species Council and its partners including the Aquatic Nuisance Species Committee, Noxious Weed Control Board, Ballast Water Work Group, Tunicate Response Advisory Committee, and others; Program; Policy, Funding; RCO (Invasive Species Council); WDFW, DOE, DNR, AGR, DOH, DPR, USFWS, USDOA, USCG, USGS, NMFS, etc.

Question 4 Page 6?: D.5 Improve compliance with rules and regulations to increase the likelihood of achieving ecosystem outcomes

ADD NEW BULLETS

6. Continue to support and enhance the Department of Fish & Wildlife's ballast water management program; Program; Funding; DFW; DOE, Coast Guard

7. Continue to support and enhance the Department of Fish & Wildlife's tunicate response program; Program; Funding; DFW; DOE, DNR, USFWS

8. Develop a team at the Department of Fish & Wildlife to lead rapid response actions for new introductions of invasive species; Program (new); Funding; DFW; DOE, DNR, USFWS, Invasive Species Council

Comments on Draft 2020 Action Agenda for Puget Sound

Mark L. Plummer, Ph.D.
Northwest Fisheries Science Center
NOAA Fisheries

Summary
My comments on the Draft 2020 Action Agenda for Puget Sound ("Draft Action Agenda") are limited to the choice of the provisional indicator for the Human Well-Being goal. The chosen indicator does not meet the criteria identified in O'Neill *et al*. (2008) and will provide poor guidance for any interim Action Agenda decisions as they relate to the Human Well-Being goal.

Discussion
The Human Well-Being (HWB) goal for the Puget Sound partnership is stated as follows:

> A quality of human life that is sustained by a functioning Puget Sound ecosystem.

The Draft Action Agenda expands on this goal by providing the following desirable outcomes:

> Human well-being means that people are able to use and enjoy the lands and waters of the Puget Sound. A healthy ecosystem provides aesthetic values, opportunities for recreation, and access for the enjoyment of Puget Sound. Tribal cultures depend on the ability to exercise treaty rights to fish, gather plants, and hunt for subsistence, cultural, spiritual, ceremonial and medicinal needs. The economic health of tribal communities depends on their ability to earn a livelihood from the harvest of fish and shellfish. Human well-being is also tied to economic prosperity. A healthy ecosystem supports thriving natural resource and marine industrial uses such as agriculture, aquaculture, fisheries, forestry, and tourism.

These outcomes illustrate the challenges in selecting indicators to measure progress towards this goal. HWB cannot be captured by a limited set of metrics, for it varies widely throughout the region due to the varying relations Puget Sound inhabitants have with the ecosystem. Choosing HWB indicators is further complicated by the complex relation between human well-being and ecological and socioeconomic conditions.

Recognizing that no single indicator will capture all aspects of HWB, it is still desirable to have a provisional HWB indicator that is meaningful and defensible. To this end, one can apply the criteria identified in O'Neill *et al*. (2008) to the Draft Action Agenda, specifically:

1. Is the indicator conceptually valid and relevant to PSP goals?
2. Do data exist for the indicator?
3. Can the indicator be feasibly implemented?
4. Are the statistical properties of the indicator understood?
5. Does the indicator meet management and reporting needs?

Most HWB indicators satisfy the 2nd, 3rd, and 4th criteria; the 1st and 5th criteria are the most challenging. In particular, the validity and relevance of an indicator to the PSP HWB goal depends on how accurately a change in the indicator measures progress towards that goal - that is, in human well-being.

The HWB indicators chosen in the Draft Action Agenda do not satisfy the 1st criteria in any meaningful way. The indicators chosen are "forest acreage below 1000 feet" and "impervious surface." For the first measure, the Draft Action Agenda does not clearly specify whether the measure is forest *cover* (that is, the presence or absence or trees) or forest *land* (that is, the use of land to grow trees, whether or not the land is currently covered with a growing or mature forest). The difference between these two measures is of obvious importance, as one can easily have changes in the extent of forest cover (between two points in time) without having any change in the amount of forestland.

Assuming the intent is to use the latter, both the forestland and impervious surface indicators do not have unambiguous relations with HWB. The conceptual validity of a HWB indicator rests on its ability to signal changes in HWB clearly. This would be the case if a loss of forestland acreage and an increase in impervious surface acreage unambiguously signaled a decline in HWB. This is not the case, however, and for forestland acreage there are strong reasons to believe the opposite is true for many parcels of forestland. In general, a change in land use signals a change in the perceived highest and best use (HBU) of that land from a private perspective. From the land owner's persepctive, the change in land use increases HWB relative to leaving the land in its current use. For impervious surface, the link between changes in its extent and HWB is less clear because such changes are usually in conjunction with other land use changes.

Making a case for forestland *loss* as a signal of *decreased* HWB thus requires the presence of externalities or social costs. If present, these can lead to such an outcome, in that the aggregate social cost of land conversion can outweigh the private gain from doing so. Although this issue is discussed nowhere in the Draft Action Agenda, one can gain some insights into its possible validity by considering the Draft Action Agenda's (brief) discussion of this indicator:

> Nearly 200 square miles of forested area were lost from the Puget Sound basin in a recent 10-year period (1991-2001), representing a loss of nearly four percent of the lowland forests. The loss of these forest lands represents a loss of *open space*, *recreation opportunities*, and *the ability to earn a livelihood in sustainable forest industries* (italics added).

This identifies three candidates for possible social impacts.

1. The loss of open space provides a possible source of social costs, as private property owners do not necessarily consider those impacts in determining the HBU of their land. It is not the case, however, that these impacts will necessarily outweigh the private gain in

each (or any) case, and so even in the presence of such a social impact, changes in forestland do not provide an unambiguous signal for changes in HWB.

2. The loss of recreation opportunities depends on what opportunities currently exist on the forestland that is undergoing change. The vast majority of lowland forests in the Puget Sound area are privately owned, and almost all of the conversion that has taken place over the past decade is on private land. The recreation opportunities lost due to private forestland conversion is likely to be minimal, although no data are available to investigate this.
3. The ability to earn a livelihood in the forest industry is not normally a factor that one considers in the accounting of social costs and benefits. If the forestland conversion is generated by a change in the HBU of the land, it is hard to see how this "impact" is relevant. Moreover, the forest sector itself is a small part of the Puget Sound economy. A recent report by the University of Washington's College of Forest Resources (The Future of Washington's Forests and Forestry Industries, 2007) examines the forest sector's gross business income (GBI) and employment relative to total GBI and employment for different Puget Sound regions. Their analysis shows in the North and South Puget Sound timberland regions, the forest sector accounts for 1.7% and 4.5% of the total regional GBI, and 1.0% and 2.4% of the total regional employment, respectively. These figures raise serious questions about using forestland as an indicator that attempts to measure economic aspects of HWB in the Puget Sound region.

As for changes in impervious surface, there are stronger connections between changes in its extent and possible social costs, but the lack of any discussion whatsoever of this indicator makes considering its validity futile.

In sum, the choice of changes in forestland and impervious surface area as HWB indicators does not satisfy the most important criterion for indicator choice, namely, that the indicator be conceptually valid and relevant to PSP goals.

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From: **Phalla Pol**

Comment: Dear Puget Sound Partnership,

I am writing to urge you to improve your action agendas recommendations on pollution prevention.

From: **Pat Porter**

Comment: Dear Puget Sound Partnership,

The Partnership staff, the Leadership Council, Ecosystem Coordinating Board, Science Panel and stakeholders throughout the Sound deserve praise for the monumental effort involved in producing the draft Action Agenda. The next step is to finalize a plan that is accountable, transparent, effective and have dedicated new funding sources to the recovery of Puget Sound by 2020.

The Partnership must create a real 2020 Action Agenda, not just a 2-year plan that clearly identifies the specific actions that are needed over the next 12 years and the HOW and WHO and BY WHEN each action must be completed. All the actions need to be tied together into a comprehensive whole through measurable benchmarks that must be accomplished in order to achieve recovery by 2020.

Thank you for this opportunity to strengthen a strategy to save Puget Sound.

From: **Randall Post**

Comment: Dear Puget Sound Partnership,

I am writing to urge you to improve your action agenda's recommendations on pollution prevention.

From: **Dorothy Potts**

Comment: Dear Puget Sound Partnership,

Thank you for your hard work to develop a draft Action Agenda to restore, protect and recover Puget Sound to health by 2020. It could not come at a more pressing time, especially for the Sound's iconic and endangered orca whale. Just this month, researchers reported seven orcas "10% of the Puget Sound population" are missing and believed to be dead. Some experts say dwindling populations of endangered Chinook salmon are at least partly to blame. Is this a sign that our ecosystem is on the verge of collapsing?

The urgency of restoring the Sound to health is at a tipping point and missing orcas are the Sound's "canaries in the coal mine," telling us we are running out of time. But there is hope for the orca, as there was hope for the bald eagle, the California Condor and others on the verge of extinction. The Puget Sound Partnership's Action Agenda is a golden opportunity to do what has not been done for over 20 years- develop and implement a recovery plan that is accountable, effective, transparent and

decisive with sustained funding to restore this national treasure to health by 2020.

The draft Action Agenda includes many of the essential elements that need to be done:

-Require low-impact development to reduce stormwater pollution;

-Prohibit new bulkheads near feeder bluffs and forage fish spawning beaches;

-Fund local governments to develop and carry out shoreline master programs;

-Fund enforcement staff at state agencies and local governments;

-Implement specific, aggressive cleanup plans for polluted waters, including TMDLs;

-Fully fund a permanent year-round rescue tug at Neah Bay for oil spill prevention;

-Acquire critical intact parcels for habitat protection and conservation;

-Set strong requirements for water quantity, such as setting in-stream flow for all major rivers.

BUT, more than a list of Soundwide and Action Area-specific actions, the Partnership must create a real 2020 Action Agenda, not just a 2-year plan, that clearly identifies the specific actions that are needed over the next 12 years and the HOW and WHO and BY WHEN each action must be completed. All the actions need to be tied together into a comprehensive plan with measurable benchmarks and timelines in order to achieve recovery by 2020. The final Action Agenda must:

-Clearly identify timelines and responsibilities;

-Identify adequate and sustained funding for the long haul;

-Be a visionary and long term plan;

-Be based on science;

-Offer a comprehensive and robust program to prevent all sources of stormwater pollution, not just municipal stormwater;

-Strengthen the list of actions for toxic pollution prevention;

-Set meaningful standards for habitat protection;

-Balance regulatory change with land acquisition to accomplish long term recovery goals;

-Expand the indicator species to include more than just salmon, i.e. forage fish, harbor seals, etc.

The Partnership staff, the Leadership Council, Ecosystem Coordinating Board, Science Panel and stakeholders throughout the Sound deserve praise for the monumental effort involved in producing the draft Action Agenda. The next step is secure much needed funding. The 2009 legislature must adopt new funding sources dedicated to the recovery of Puget Sound by 2020.

For Puget Sound!

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From: Mark Powell

Comment: Dear Puget Sound Partnership,

The road to hell is paved with good intentions. This plan is a good first step, but it needs more transparency and accountability in order to meet the challenge of restoring Puget Sound. We in the nortwest know what happens with a plan that looks good on paper but lacks punch. We've watched salmon decline as plan after plan is produced to save them. We need a strong plan that will actually drive progress in changing the way we relate to our ocean environment.

The Partnership must create a real 2020 Action Agenda, not just a 2-year plan that clearly identifies the specific actions that are needed over the next 12 years and the HOW and WHO and BY WHEN each action must be completed. All the actions need to be tied together into a comprehensive whole through measurable benchmarks that must be accomplished in order to achieve recovery by 2020.

Thank you for this opportunity to strengthen a strategy to save Puget Sound.

From: Linda Powers

Comment: Dear Puget Sound Partnership,

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The Partnership must create a real 2020 Action Agenda, not just a 2-year plan that clearly identifies the specific actions that are needed over the next 12 years and the HOW and WHO and BY WHEN each action must be completed. All the actions need to be tied together into a comprehensive whole through measurable benchmarks that must be accomplished in order to achieve recovery by 2020.

Thank you for this opportunity to strengthen a strategy to save Puget Sound.

From: Karen Price

Comment: Dear Puget Sound Partnership,

I am writing to urge you to improve your action agenda's recommendations on pollution prevention.

From: Kathy Prince

Comment: Dear Puget Sound Partnership,

Thank you for your hard work to develop a draft Action Agenda to restore, protect and recover Puget Sound to health by 2020. When it comes to restoring the health of the Puget Sound, where and how we grow matters. Especially in light of the one million new residents the state expects to welcome by

2020. It's more crucial than ever to focus that growth inside our urban areas so that we can preserve our farm and forest land and protect our rural areas to restore critical habitats and watersheds of the Sound.

While I applaud your effort thus far, the Action Agenda can and must go farther. We need a twenty year plan, not a two year plan. All the actions need to be tied together into a comprehensive plan with measurable benchmarks and timelines in order to achieve recovery by 2020.

As you finalize the final Action Agenda, please:

Balance regulatory change with land acquisition to accomplish long term recovery goals;

Take advantage of the region's recent vote to build 34 miles of new light rail - we must capitalize on this investment by requiring more intense development near these station areas that are pedestrian, bicycle and transit friendly;

Identify adequate and sustained funding for the long haul;

Clearly identify timelines and responsibilities;

Be based on science;

Set meaningful standards for habitat protection.

The Partnership staff, the Leadership Council, Ecosystem Coordinating Board, Science Panel and stakeholders throughout the Sound deserve praise for the monumental effort involved in producing the draft Action Agenda. The next step is secure much needed funding. The 2009 legislature must adopt new funding sources dedicated to the recovery of Puget Sound by 2020.

For Puget Sound!

From: Pam Pritzl

Comment: Dear Puget Sound Partnership,

I totally support the draft Action Agenda and urge that this plan will be finalized to help recover Puget Sound by 2020.

Time is running out and our precious Puget Sound must be saved from further degredation.

From: Curt Puddicombe

Comment: This action agenda is an excellent start, and there's no doubt that much needs to be done on a number of fronts, however, I was hoping you would do more to address the rapid expansion of shellfish and geoduck aquaculture in South Sound. I know you are friendly with Taylor Shellfish, and perhaps others in the shellfish industry, as they are quite active in government, and there is a long tradition of cooperation between the state and shellfish growers that is self evident. But the simple fact is, the shellfish industry is responsible for a lot of habitat damage, both in Willapa Bay and Puget

Sound, yet you have failed to address this growing threat in any meaningful way in your draft action agenda. There is already ample scientific analysis and opinion on the detrimental effects to the environment wrought by the shellfish industry. From the eradication of the native Olympia oysters, to the introduction of invasives, including the Pacific oyster, the oyster drill, Gallo mussels and Manila clams, to the destruction of salmon habitat in Willapa Bay and South Puget Sound through the use of carbaryl and the modification of nearshore habitat, there is plenty there for you to expound on. This industry continues to demonstrate it's intention of expanding into serene residential areas of South Sound that are not traditional shellfish growing areas. Some of these areas have been shown to have high levels of habitat value for Chinook and Coho, and they should not be altered by geoduck aquaculture. Studies have shown quite clearly that salmon survival can be correlated with the nearshore areas that are in natural condition. Puget Sound salmon have adapted to this habitat over the course of millions of years, and the rapid alteration of these habitats is most likely damaging in the long run. Having said that, I am not advocating the end to the shellfish industry, but I think it makes sense to regulate this industry and to limit the areas that they are allowed to commercially alter. Obviously, in South Sound, the industry is trying to expand as rapidly as it can before the regulations come on line. I would appreciate it if you would address this troubling issue in the future relative to it's importance. In this agenda, you have completely failed to acknowledge this problem as it currently exists. Thank you.

From: Steven Puddicombe

Comment: Dear Puget Sound Partnership,

I want to support the action agenda for preserving the ecological integrity of Puget Sound. I don't live on the Sound now, but spent a good share of my youth on its shores and in its waters. Some of my family still reside on the Sound.

Over the years we've become alarmed by some of the changes, mostly due to growth and its attendant pollution. deforestation, and industrial dumping, etc.

We need to set clear goals and timetables for achieving them. We must be longterm in our approach and we must act now to begin.

From: Tom Quinn

Comment: Thank you for this opportunity, albeit in a brief period, to examine and comment on the draft Agenda for Puget Sound. Let me first commend you for the great deal of thought and work that went into this document, and for the frank admission that it implies of our failures to protect the heart of the region. I have only lived here for 32 years but it has been stunning and dismaying to watch the headlong rush for growth, the obvious degradation of the environment, and the governmental inability to stop it. Indeed, government leaders of both parties have encouraged the very things that they now profess to abhor. Recall the way in which our "leaders" begged the US Navy to bring an aircraft carrier battle group to Everett. I suppose it is too much ask that this document make some statements about the follies of the past.

As for the draft itself, I concur with the idea that we need a combination of protection of existing areas

of value, restoration of those with the capacity to return to higher levels of productivity, and prevent pollution. I do not have sufficient time to pore over the details so permit me to share some brief thoughts.

First, I worry when the protection and restoration of Puget Sound is couched by politicians in such terms as "without disrupting economic growth" or "but not at a cost to the building industry" or other remarks in this vein. I live in Seattle and am astonished by the rapidity with which multi-family building units are being built. I grew up in New York City so I know what density is all about, and I do not object to this form of development. However, whenever I drive outside of the city I am equally astonished by the endless sprawl that occurs. I find it hard to see Puget Sound getting better if this is the plan. To put it bluntly, I would like our leaders to answer a simple question, grounded in fundamental ecology: "What is the ideal human population of this region (geographically defined in any way that makes sense)? If it is smaller than the present, how will we get back down to that one? If it is larger than the present, how will we slow down and stop at that level?" There must be some recognition of this "carrying capacity" or efforts will be doomed. Yes, we can reduce the "per capita" impact by recycling, efficiency, etc. and I am gratified to see how well this region does in these regards.

However, at some point you can only reduce per capita use so much, and you need fewer capitas. Second, it is not fair of me to excoriate the current crop of leaders and let those in the past off the hook. My sharpest words are for those who forever privatized so much of Puget Sound by selling the tidelands. Puget Sound's tremendous shoreline is among its notable features and is of great ecological importance to all trophic levels. Unlike British Columbia, where the tidelands are publically accessible, those in Puget Sound are almost all bought and fully controlled. This lack of access to Puget Sound means that for most people it is a view from the distance or a ferry ride.

The state parks are far, far too few and too small, and one quickly walks to the end and is confronted by a "private beach- no trespassing" sign. I cannot tell you how much this bothers me. In addition to the annoyance of having such limited access, however, one also must recognize the very harmful ecological effects that all this privatization has had on the sound. Get in a small bo at and row, sail, or motor along, for example, the west side of Hood Canal. The amount of natural "bluff and beach" shoreline is very, very limited. Instead, what we find are hardened, rocky structures that have obviously disrupted natural sediment transport processes and the vegetation that should accompany them. We also find dock after dock.

For the affluent few with yachts there are some marine parks on islands to enjoy but for most it is shore access or none. I think in addition to protecting the shoreline fiercely we should also start to enlarge existing parks or at least buy up, bit by bit, the access to the tidelands. In many cases the owners live up on the bluff over the water and do not even use the beach so obtaining public access should not be impossible. Little by little, we can take back the shoreline for the public, and allow it to go to its natural condition. Go along the shore of Squaxin Island and look at what Puget Sound should be like: Trees, r ocky shoreline, shell hash, barnacles, herring, cutthroat trout, seals, cormorants. We need to get more of Puget Sound in this condition, and allow more people access to these kinds of habitats. Finally, I have a special interest in salmon, trout and their relatives, and I appreciate the holistic approach to salmon and the rivers on which they depend.

My comments are similar to those I express above regarding beaches. There are so many areas where people obviously do not belong. When are we going to start moving people back from flood plains, letting the rivers flood, and heal themselves? Get in a raft and go down many of our rivers and you will see similar problems to those in Puget Sound's marine waters -people living too close to the

river and denying the river's natural tendency to move around. I am tired of watching the evening news in November and seeing people living on flood plains complaining when they get flooded. No more subsidy for this kind of foolishness!

Salmon restoration, however, will be more than sensible and firm habitat protection. We also need to take a hard look at our philosophy and the agency that manages salmon and trout. WDFW needs to realize that its fundamental responsibility is first to the fish and then to the fishermen, not the other way around. Fishery management, both sport and commercial, is designed to cut way, way too close to the bone and the escapement is not the priority that it should be.

Consequently, small populations get overfished, hatchery production and the fishing that it encourages is the priority rather than habitat, and the cart is before the horse. It is not the responsibility of WDFW to feed the citizens of the state. I realize that a certain amount of "put and take" fishing is OK but we need to stop managing wild population for human consumption. It is great that cutthroat trout are not to be killed in saltwater but as soon as they go back into rivers they are vulnerable. Why not make all wild trout catch and release only? Even more shameful is that bull trou t, federally listed as Threatened under the ESA, are subject to kill fisheries in our major rivers. One can legally kill two bull trout a day over 20- in the major rivers of central and north Puget Sound. Unbelievable! How can we talk about restoration of salmon when our main goal is to maximize consumption fishing? WDFW is, in my view, failing to show leadership and is responding to the most backward subset of its constituency.

In closing, I repeat my thanks to you for your hard work and vision and hope that it leads to the improvement of this body of land and water that is so crucial to human and natural systems in this region. Do not think me mean-spirited in my criticism of people and agencies. However, if your Action Agenda is to get implemented you must recognize not only the ecological processes but also the political and social systems and processes that have brought us to this state of affairs. You must also ask whether the agencies and leaders that got us into this mess are the ones that can get us out.

From: Michael Racine

Comment: Folks, Thanks for the opportunity to comment on the science plan. I noted that section E.3.4.1 of the draft action agenda speaks to the need for scientific capacity and E.4.2.3 speaks to the notion of volunteer involvement through citizen science. Near term action #7 under priority E calls to "Develop and implement a coordinated citizen science program." I don't see anything in the science plan that speaks to involvement of citizen scientists. Clearly not all volunteers are capable of participating in rigorous, peer-reviewed scientific studies. There are, however, some. And we'd like to be involved. In rigorous science. We can add capacity to the system. You have 10 lbs of work to do, but only a 5 lb sack to do it with. We can help increase your capacity to do rigorous science, particularly in data collection/monitoring. Please consider involving citizens with expert knowledge and skills who can help in the data collection/monitoring aspects of the science program.

From: Darcy Rae

Comment: Dear Puget Sound Partnership,

I am writing to urge you to improve your action agenda's recommendations on pollution prevention.

From: Mary Anne Rangel-Guerrero

Comment: Puget Sound Partnership;

Thank you for keeping me aware. I have a question. To whom in your group could or others like myself ask about local issues here in Bellingham. We are, for example, in a battle to save a property with category wetlands that sits between two salmon baring streams and is heavily wooded with beautiful second growth trees. This property is slated for high density development and is the gateway to famous Chuckanut Drive. An EIS is being done now. To whom could we address questions, especially in light of the fact that the Puget Sound Partnership is working hard to save the sound and waterways?

Thank you.

From: Sandra Ray

Comment: Dear Puget Sound Partnership,

I am writing to urge you to improve your action agenda's recommendations on pollution prevention.

From: Genevieve Raymond

Comment: Dear Puget Sound Partnership,

Thank you for your commitment to developing an Action Agenda for a healthy Puget Sound. From struggling orcas to toxic chemicals in our water, the Sound needs quick and decisive action today. I want to make sure we pass a thriving Puget Sound on to future generations.

I urge the Partnership to incorporate accountability, benchmarks of success, and ample funding into this Agenda.

The draft Action Agenda includes many of the essential elements that need to be accomplished, but in addition, the final Action Agenda must also:

-Amend the Cruise Ship MOU to ban all cruise ship discharges in Puget Sound;

-Prioritize the protection and restoration of the State's forage fish spawning beds;

-Complete the Management Plan for the Cherry Point Aquatic Reserve;

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-Identify adequate and sustained funding for Plan implementation;

-Update the guidance for open water dredge disposal of PCBs;

-Expand the indicator species to include forage fish abundance and harbor seal toxics loading; and

-Accelerate the restoration of the Elwha River.

Thank you for your hard work to develop a draft Action Agenda to restore, protect and recover Puget Sound to health by 2020.

On behalf of everything from eelgrass to orcas.

From: Susanne Raymond

Comment: Dear Puget Sound Partnership,

I am writing to urge you to improve your action agenda's recommendations on pollution prevention. I want a healthy Puget Sound to be part of the legacy we leave our children.

Many Washington manufacturers continue to use harmful chemicals without any plans to switch to chemicals that are safer for Puget Sound. To protect public health and the environment, Washington's industry must begin phasing out of the worst toxic chemicals and developing plans to switch to safer alternatives.

Please include recommendations to help move Washington's businesses toward safer alternatives and away from chemicals known to be harmful to Puget Sound. These proposals should include:

- Increasing the availability of technical assistance to help businesses reduce chemical use.

- Developing a state program to focus on researching safer chemicals and materials.

- Requiring better industry reporting to Ecology of the chemicals currently being used.

From: Peter Reiquam

Comment: Dear Puget Sound Partnership,

The Partnership staff, the Leadership Council, Ecosystem Coordinating Board, Science Panel and stakeholders throughout the Sound deserve praise for the monumental effort involved in producing the draft Action Agenda. The next step is to finalize a plan that is accountable, transparent, effective and have dedicated new funding sources to the recovery of Puget Sound by 2020.

The Partnership must create a real 2020 Action Agenda, not just a 2-year plan that clearly identifies the specific actions that are needed over the next 12 years and the HOW and WHO and BY WHEN each action must be completed. All the actions need to be tied together into a comprehensive whole through measurable benchmarks that must be accomplished in order to achieve recovery by 2020.

Thank you for this opportunity to strengthen a strategy to save Puget Sound.

From: Cat Reny

Comment: Dear Puget Sound Partnership,

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-Complete the Management Plan for the Cherry Point Aquatic Reserve;

-Identify adequate and sustained funding for Plan implementation;

-Update the guidance for open water dredge disposal of PCBs;

-Expand the indicator species to include forage fish abundance and harbor seal toxics loading; and

-Accelerate the restoration of the Elwha River.

Thank you for your hard work to develop a draft Action Agenda to restore, protect and recover Puget Sound to health by 2020.

On behalf of everything from eelgrass to orcas.

From: Leah Reuben-Werner

Comment: Dear Puget Sound Partnership,

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Thank you for this opportunity to strengthen a strategy to save Puget Sound.

From: Elisabeth Revell

Comment: Dear Puget Sound Partnership,

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Thank you for this opportunity to strengthen a strategy to save Puget Sound.

From: Cathy Reynolds

Comment: Dear Puget Sound Partnership,

Thank you for your hard work to develop a draft Action Agenda to restore, protect and recover Puget Sound to health by 2020. When it comes to restoring the health of the Puget Sound, where and how we grow matters. Especially in light of the one million new residents the state expects to welcome by 2020. It's more crucial than ever to focus that growth inside our urban areas so that we can preserve our farm and forest land and protect our rural areas to restore critical habitats and watersheds of the Sound.

While I applaud your effort thus far, the Action Agenda can and must go farther. We need a twenty year plan, not a two year plan. All the actions need to be tied together into a comprehensive plan with measurable benchmarks and timelines in order to achieve recovery by 2020.

As you finalize the final Action Agenda, please:

-Balance regulatory change with land acquisition to accomplish long term recovery goals;

-Take advantage of the region's recent vote to build 34 miles of new light rail - we must capitalize on this investment by requiring more intense development near these station areas that are pedestrian, bicycle and transit friendly;

-Identify adequate and sustained funding for the long haul;

-Clearly identify timelines and responsibilities;

-Be based on science;

-Set meaningful standards for habitat protection.

The Partnership staff, the Leadership Council, Ecosystem Coordinating Board, Science Panel and stakeholders throughout the Sound deserve praise for the monumental effort involved in producing the draft Action Agenda. The next step is secure much needed funding. The 2009 legislature must adopt new funding sources dedicated to the recovery of Puget Sound by 2020.

For Puget Sound!

From: Lisa Reynolds

Comment: Dear Puget Sound Partnership,

I am writing to urge you to improve your action agendas recommendations on pollution prevention. It is incumbent upon us to lead and set our expectations high. Specific objectives must be outlined, and short-term as well as long-term goals communicated to Washington businesses, law makers, stakeholders, and local consumer/voters. We have waited to long to act - being pro-active is no longer an option. The ocean is such a big place, we can hope that changing our behavior now will reverse the process, but sadly, we have done irrevocable harm to the Orca. Pollutants will rest in the ocean, and at the top of the food chain, these giants take in what ever is there. You know this. We must act aggressively to mitigate what damage has been done, and to save these story tellers for future generations.

From: Casey Rice

Comment: 1) Too short a period to review and comment

2) Not a very coherent framework for this effort. I've commented on this in previous rounds.

3) It is a mistake to continue the disproportionate emphasis on water quality.

From: Timothy Rich

Comment: Dear Leadership Council,

Thank you for the opportunity to comment on the Puget Sound Partnership Draft Action Agenda. I really appreciate the tremendous amount of work that has gone into developing it and I support the strong list of measures that, if implemented, will go a long way toward recovering Puget Sound by 2020.
I would like to ask, however, that the following two points be considered for in the plan. The final plan should include Outstanding Resource Water (ORW) designation under the Clean Water Act as a tool to help protect rivers and other aquatic habitat. While I strongly support the inclusion of Wild and Scenic designation as a similar tool, in some cases ORW designation will likely prove to be a better, more immediate way for the state to ensure the protection of high quality rivers and other waters. Therefore, I urge the Partnership to include support for the Outstanding Resource Water designation as one of its "Near Term Actions." ORW designations permanently protect high quality waters that are

ecologically significant, provide cold water refuges for fish, and/or support important recreational values.

Many rivers in the Puget Sound region are eligible for ORW designation.
I would also like to encourage you to include funds to move up the removal of the two dams on the Elwha from 2012 to 2010. Removal of the

Elwha dams is one of the best chances for salmon and steelhead recovery in the region as it will open up over 70 miles of prime spawning habitat. Removing these dams has also been as a key action to recover our Puget Sound's orca population, which is malnourished thanks to a lack of chinook salmon.

Thank you for taking my comments into consideration.

Comment: Dear Leadership Council,

Thank you for the opportunity to comment on the Puget Sound Partnership Draft Action Agenda. I appreciate the tremendous amount of work that has gone into developing it and I support the strong list of measures that, if implemented, will go a long way toward recovering Puget Sound by 2020.

The draft plan includes a few omissions. The final plan should include Outstanding Resource Water (ORW) designation under the Clean Water Act as a tool to help protect rivers and other aquatic habitat. While I strongly support the inclusion of Wild and Scenic designation as a similar tool, in some cases ORW designation will likely prove to be a better, more immediate way for the state to ensure the protection of high quality rivers and other waters. Therefore, I urge the Partnership to include support for the Outstanding Resource Water designation as one of its "Near Term Actions." ORW designations permanently protect high quality waters that are ecologically significant, provide cold water refuges for fish, and/or support important recreational values. Many rivers in the Puget Sound region are eligible for ORW designation. I would also like to encourage you to include funds to move up the removal of the two dams on the Elwha from 2012 to 2010. Removal of the Elwha dams is one of the best chances for salmon and steelhead recovery in the region as it will open up over 70 miles of prime spawning habitat. Removing these dams has also been as a key action to recover our Puget Sound's orca population, which is malnourished thanks to a lack of chinook salmon.

Especially during difficult financial times, finding opportunities for economic benefit and job creation is important. Removing the Elwha dams provides a tremendous opportunity for creating "green jobs" and numerous other economic benefits.

Thank you for taking my comments into consideration.

From: Jeanette Richoux

Comment: Dear Puget Sound Partnership,

Thank you for your hard work to develop a draft Action Agenda to restore, protect and recover Puget Sound to health by 2020. It could not come at a more pressing time, especially for the Sound's iconic and endangered orca whale. Just this month, researchers reported seven orcas "10% of the Puget Sound population" are missing and believed to be dead. Some experts say dwindling populations of

endangered Chinook salmon are at least partly to blame. Is this a sign that our ecosystem is on the verge of collapsing?

The urgency of restoring the Sound to health is at a tipping point and missing orcas are the Sound's "canaries in the coal mine," telling us we are running out of time. But there is hope for the orca, as there was hope for the bald eagle, the California Condor and others on the verge of extinction. The Puget Sound Partnership's Action Agenda is a golden opportunity to do what has not been done for over 20 years- develop and implement a recovery plan that is accountable, effective, transparent and decisive with sustained funding to restore this national treasure to health by 2020.

The draft Action Agenda includes many of the essential elements that need to be done:

-Require low-impact development to reduce stormwater pollution;

-Prohibit new bulkheads near feeder bluffs and forage fish spawning beaches;

-Fund local governments to develop and carry out shoreline master programs;

-Fund enforcement staff at state agencies and local governments;

-Implement specific, aggressive cleanup plans for polluted waters, including TMDLs;

-Fully fund a permanent year-round rescue tug at Neah Bay for oil spill prevention;

-Acquire critical intact parcels for habitat protection and conservation;

-Set strong requirements for water quantity, such as setting in-stream flow for all major rivers.

BUT, more than a list of Soundwide and Action Area-specific actions, the Partnership must create a real 2020 Action Agenda, not just a 2-year plan, that clearly identifies the specific actions that are needed over the next 12 years and the HOW and WHO and BY WHEN each action must be completed. All the actions need to be tied together into a comprehensive plan with measurable benchmarks and timelines in order to achieve recovery by 2020. The final Action Agenda must:

-Clearly identify timelines and responsibilities;

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-Be based on science;

-Offer a comprehensive and robust program to prevent all sources of stormwater pollution, not just municipal stormwater;

-Strengthen the list of actions for toxic pollution prevention;

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-Expand the indicator species to include more than just salmon, i.e. forage fish, harbor seals, etc.

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our sound, our community, our chance

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For Puget Sound!

From: Barbara Rider

Comment: Dear Puget Sound Partnership,

I am writing to urge you to improve your action agenda's recommendations on pollution prevention.

As a former citizen of the Puget Sound area, and still a resident of Washington state (in Camas), I would like to see better solutions put in place to insure survival and thriving lives of the sea life in the sound.

In particular, I would like to see businesses, homes and governmental agencies who affect the water in the Sound be required to improve and reduce, or even eliminate the toxins that are routinely released through mechanisms into the sound.

Instead of cleaning up problems after they "spill", let's stop the pollution BEFORE it gets spilled. This means enacting new requirements and limits on the polluters of the Puget Sound, and our other waterways.

Thank you!

From: Peter Rimbos

Comment: Dear Puget Sound Partnership,

Thank you for your hard work to develop a draft Action Agenda to restore, protect and recover Puget Sound to health by 2020. When it comes to restoring the health of the Puget Sound, where and how we grow matters. Especially in light of the one million new residents the state expects to welcome by 2020. It's more crucial than ever to focus that growth inside our urban areas so that we can preserve our farm and forest land and protect our rural areas to restore critical habitats and watersheds of the Sound.

While I applaud your effort thus far, the Action Agenda can and must go farther. We need a twenty year plan, not a two year plan. All the actions need to be tied together into a comprehensive plan with measurable benchmarks and timelines in order to achieve recovery by 2020.

As you finalize the final Action Agenda, please:

-Balance regulatory change with land acquisition to accomplish long term recovery goals;

-Take advantage of the region's recent vote to build 34 miles of new light rail - we must capitalize on this investment by requiring more intense development near these station areas that are pedestrian,

bicycle and transit friendly;

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For Puget Sound!

From: Joan Robbins

Comment: Dear Puget Sound Partnership,

Thank you for your commitment to developing an Action Agenda for a healthy Puget Sound. From struggling orcas to toxic chemicals in our water, the Sound needs quick and decisive action today. I want to make sure we pass a thriving Puget Sound on to future generations.

I urge the Partnership to incorporate accountability, benchmarks of success, and ample funding into this Agenda.

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-Update the guidance for open water dredge disposal of PCBs;

-Expand the indicator species to include forage fish abundance and harbor seal toxics loading; and

-Accelerate the restoration of the Elwha River.

Thank you for your hard work to develop a draft Action Agenda to restore, protect and recover Puget Sound to health by 2020.

On behalf of everything from eelgrass to orcas.

From: Melissa Roberts

Comment: Thanks for all of your great work in putting together this document. I just have a few typographic remarks. I have included more substantive remarks in another document.

Question 2, Page 6 - last paragraph, "current the situation"

Question 3, Page 21 - C.1.3, "Shellfish Protection District (add) Plans"

Whatcom Action Area Priorities, Local threats to ecosystem benefits, Invasive Species - Chuckanut Bay is spelled incorrectly Whatcom Action Area Priorities, Priority action area strategies, Reduce sources of water pollution, Prevent pollution, second bullet - "Portage Bay" (not Bays) Whatcom Action Area Priorities, Ecosystem benefits, Community and Economy - Lummi Nation instead of Lummi Tribe

Thanks again for your hard work.

From: Kit Robinson

Comment: Dear Puget Sound Partnership,

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From: Kristina Rodden

Comment: Dear Puget Sound Partnership,

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From: Lea Ann Rolla

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From: Janna Rolland

Comment: Dear Puget Sound Partnership,

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From: Melissa Ropke

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From: Francis Roque

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For Puget Sound!

From: Jennifer Rosario

Comment: Dear Puget Sound Partnership,

I am writing to urge you to improve your action agendas recommendations on pollution prevention.

It is evident that the orca population is decreasing because of water quality in the Sound. I am one of the many voices that is concerned with the health and quality of our waters.

I hope that you share the same concerns as I do.

I thank you for your time and consideration on this matter.

From: Peter Roth

Comment: Dear Puget Sound Partnership,

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For Puget Sound!

From: Matt Rourke

Comment: Thank you for the opportunity to comment. I grew up on Puget Sound, taking advantage of all the amenities and natural beauty it offers. Nothing concerns me more than ensuring that my young children will have similar opportunities to have quality experiences on a healthy Sound. The greatest threats to water quality in the sound are sources of effluent and storm water runoff in my opinion.

I am a professional forester by trade, managing thousands of acres of private forest and small private timberland throughout western Washington. I also sit on the King County Rural Forest Commission and DNR Snoqualmie Unit Advisory Committee. Based on my background in forest resources and visiting more forested sites than I can count, I submit the following specific comments pertaining to the role of forest management and forest policy in the action agenda.

A.2 Near-term Actions 2. Advocate for proposed Wilderness designations:

a) Support Alpine Lakes Wilderness addition and b) Pratt River Wild and Scenic Designation. Comment: Note that Wilderness designations can prevent the Forest Service from undertaking restoration forestry in damaged forests.

Regarding "What can people do now to help? Soaking up" on Introduction Page 6, I strongly encourage changing the phrase "clear cutting of trees" to something on the order of "land clearing", "conversion of forestland", etc. I hope this was the intended context of the statement.

Considering the aquatic resource protection standards contained within the Forest Practice Rules, clearcuts are not inherantly damaging to riparian function and downstream aquatic habitats. Bufferinig streams and wetlands adjacent to clearcuts and other forest management practices effectively provide for the five riparian functions critical to the health of watersheds (including habitat for salmonids), and Puget Sound: shade, sediment filtering, bank stability, nutrient inputs, and large woody debris

recruitment. Suggesting that clear cutting trees in a forest management context is degrading Puget Sound water quality is misguided. Thanks again for your time.

From: Alice Royer

Comment: Dear Leadership Council,

Thank you for the opportunity to comment on the Puget Sound Partnership Draft Action Agenda. I appreciate the tremendous amount of work that has gone into developing it and I support the strong list of measures that, if implemented, will go a long way toward recovering Puget Sound by 2020.

The draft plan includes a few omissions. The final plan should include Outstanding Resource Water (ORW) designation under the Clean Water Act as a tool to help protect rivers and other aquatic habitat. While I strongly support the inclusion of Wild and Scenic designation as a similar tool, in some cases ORW designation will likely prove to be a better, more immediate way for the state to ensure the protection of high quality rivers and other waters. Therefore, I urge the Partnership to include support for the Outstanding Resource Water designation as one of its "Near Term Actions." ORW designations permanently protect high quality waters that are ecologically significant, provide cold water refuges for fish, and/or support important recreational values. Many rivers in the Puget Sound region are eligible for ORW designation. I would also like to encourage you to include funds to move up the removal of the two dams on the Elwha from 2012 to 2010. Removal of the Elwha dams is one of the best chances for salmon and steelhead recovery in the region as it will open up over 70 miles of prime spawning habitat. Removing these dams has also been as a key action to recover our Puget Sound's orca population, which is malnourished thanks to a lack of chinook salmon.

Especially during difficult financial times, finding opportunities for economic benefit and job creation is important. Removing the Elwha dams provides a tremendous opportunity for creating "green jobs" and numerous other economic benefits.

Thank you for taking my comments into consideration.

From: Alice Royer

Comment: Dear Puget Sound Partnership,

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On behalf of everything from eelgrass to orcas.

From: Joyce & Alan Rudolph

Comment: Dear Puget Sound Partnership,

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For Puget Sound!

From: Antoinette Ruedisueli

Comment: Dear Puget Sound Partnership,

I am writing to urge you to improve your action agenda's recommendations on pollution prevention.

From: Linelle Russ

Comment: Dear Puget Sound Partnership,

I am writing to urge you to improve your action agenda's recommendations on pollution prevention. It is important for all of us, legislators and taxpayers, to be able to assess the true cost of doing business in our state. The true cost of doing business in Washington should include each business developing and implementing systems that result in less pollution affecting our water and air.

From: Don Russell

Comment: Attached is my Action Agenda feedback for your consideration, plus photographs showing the toxic algae condition of American Lake (DSC00574.jpg), Spanaway Lake (DSC00525.jpg), Lake Steilacoom (DSC00911.jpg), Wapato Lake (DSC00764.jpg) and Waughop Lake

(DSC00400.jpg) which are all referenced in my PSP Action Agenda feedback document.

I appreciate the opportunity to comment on your draft PSP Action Agenda.

See Russell, Don attachments.

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ACTION AGENDA FEEDBACK TO THE PUGET SOUND PARTNERSHIP

How will we hold ourselves accountable? Indicators and Benchmarks

Page: Question 1 Page 3 & 4

Add an indicator of number of lakes that experience recurring toxic cyanobacteria blooms.

What is the status of Puget Sound and what are the biggest threats to it?

Page: Question 2 Page 1

Not mentioned is the near total destruction of wetlands and loss of the functions that they perform.

Priority B: Restore Ecosystem Processes, Structures and Functions

Not mentioned is the current regulatory burden imposed on agencies and citizens in their attempts to undertake restoration projects. For example: stream and lake restoration projects.

Paragraph C.4.1.3

In addition to promoting nitrogen-reducing technology include *phosphorus-reducing* technology as well to this sentence. Nitrates in freshwater lakes tend to lead to filamentous green algae growth, whereas in salt water the most devastating effect is degradation of eelgrass beds. Phosphates in freshwater lakes tend to foster toxic blue-green (cyanobacteria) blooms, whereas in salt water they are precipitated out of solution (inactivated) by complexing with insoluble calcium compounds (e.g. calcite and aragonite) with little biotic effect.

Section C. 5 Prioritize and continue to implement toxic cleanup programs for contaminated waterways and sediments.

This section should include the clean up of toxic algae infested lakes by dredging or chemical capping (e.g., alum) of nutrient rich bottom sediments.

Page: Question 3 Page 27 "…reflecting five primary objectives

The following page (Question 3 Page 28) itemizes four primary objectives in so much as one primary objective [Build and sustain long-term…] is repeated twice [as the third and fourth bullet]. The fourth bullet should read "Reform the environmental regulatory system to protect habitat at an ecosystem scale." To this objective and its further elaboration add *and restore* words as follows "… to protect *and restore* habitat at an ecosystem scale". The current environmental regulatory system assumes natural conditions (habitats) that require protection. It treats restoration activities as acts of

pollution that degrade this assumed natural condition (e.g., lake restoration activities involving phosphorus inactivation [to prevent toxic algae blooms] using aluminum, calcium and/or iron salt solution treatments).

General Comments

The Action Agenda does not identify and adequately address the fact that freshwater toxic algae blooms are occurring with increasing frequency, toxicity and duration in Puget Sound Basin lakes.

As an example: Of the 29 lakes and ponds located in Pierce County, 23 of these lakes and ponds have, during the past 15 years, experienced toxic algae blooms of sufficient toxicity to warrant Tacoma Pierce County Health Department posting warning signs that advise users of their unsafe condition. 14 of these lakes experience recurring toxic algae blooms. These include American Lake (the largest natural lake in Pierce County at 1100 surface acres in size), Bay Lake, Clear Lake, Lake Florence, Harts Lake, Lake Josephine, Ohop Lake, Palmer Lake, Silver Lake, Spanaway Lake, Lake Steilacoom, Tanwax Lake, Wapato Lake and Waughop Lake.

A number of pets and wildlife have died as a result of ingesting toxin laden water from these affected lakes and their beneficial use by the public is lost most summers. Most have a significant groundwater input which is, unfortunately, loaded with nitrates and phosphates from human activity that takes place in their watersheds (e.g., septic system effluent, surface water runoff that is introduced into groundwater via infiltration dry wells, atmospheric deposition). Discharge from these toxin laden lakes into streams and to shallow aquifer groundwater rendering the former inhospitable to salmonids, and the later a health risk to people who rely on well water as their domestic water source.

Don Russell
11/8/08

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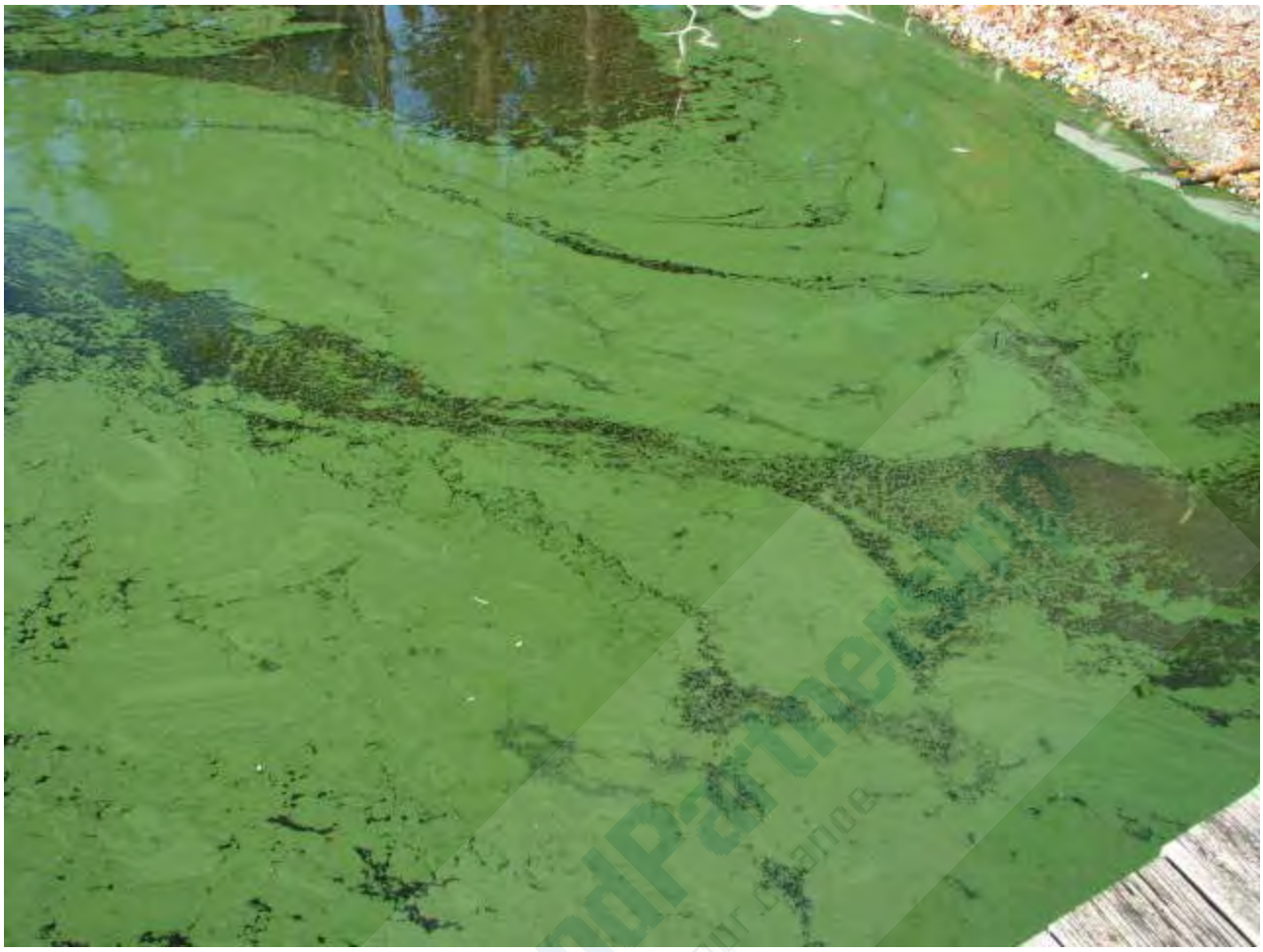

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PugetSoundNearshore.com
our sound, our community, our future

From: **Maria Ruth**

Comment: Dear Puget Sound Partnership,

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-Offer a comprehensive and robust program to prevent all sources of stormwater pollution, not just municipal stormwater;

-Strengthen the list of actions for toxic pollution prevention;

-Set meaningful standards for habitat protection;

-Balance regulatory change with land acquisition to accomplish long term recovery goals;

-Expand the indicator species to include more than just salmon, i.e. forage fish, harbor seals, etc.

The Partnership staff, the Leadership Council, Ecosystem Coordinating Board, Science Panel and stakeholders throughout the Sound deserve praise for the monumental effort involved in producing the draft Action Agenda. The next step is secure much needed funding. The 2009 legislature must adopt new funding sources dedicated to the recovery of Puget Sound by 2020.

For Puget Sound!

From: **Mark Rutherford**

Comment: Dear Leadership Council,

Thank you for the opportunity to comment on the Puget Sound Partnership Draft Action Agenda. I appreciate the tremendous amount of work that has gone into developing it and I support the strong list of measures that, if implemented, will go a long way toward recovering Puget Sound by 2020.

The draft plan includes a few omissions. The final plan should include Outstanding Resource Water (ORW) designation under the Clean Water Act as a tool to help protect rivers and other aquatic habitat. While I strongly support the inclusion of Wild and Scenic designation as a similar tool, in some cases ORW designation will likely prove to be a better, more immediate way for the state to ensure the protection of high quality rivers and other waters. Therefore, I urge the Partnership to include support for the Outstanding Resource Water designation as one of its "Near Term Actions." ORW designations permanently protect high quality waters that are ecologically significant, provide cold water refuges for fish, and/or support important recreational values. Many rivers in the Puget Sound region are eligible for ORW designation. I would also like to encourage you to include funds to move up the removal of the two dams on the Elwha from 2012 to 2010. Removal of the Elwha dams is one of the best chances for salmon and steelhead recovery in the region as it will open up over 70 miles of prime spawning habitat. Removing these dams has also been as a key action to recover our Puget Sound's orca population, which is malnourished thanks to a lack of chinook salmon.

Especially during difficult financial times, finding opportunities for economic benefit and job creation is important. Removing the Elwha dams provides a tremendous opportunity for creating "green jobs" and numerous other economic benefits.

Thank you for taking my comments into consideration.

From: **Ivy Sacks**

Comment: Dear Puget Sound Partnership,

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The Partnership must create a real 2020 Action Agenda, not just a 2-year plan that clearly identifies the specific actions that are needed over the next 12 years and the HOW and WHO and BY WHEN each action must be completed. All the actions need to be tied together into a comprehensive whole through measurable benchmarks that must be accomplished in order to achieve recovery by 2020.

Thank you for this opportunity to strengthen a strategy to save Puget Sound.

From: **Alexandrea Safiq**

Comment: I briefly went over the draft. Bottom line, we need to help the whales. There is no time left. We have got to act now. Not tomorrow, not next month, definately not a few years from now; RIGHT NOW, TODAY! The banning Chinook Salmon fishing from Canada to California is a great idea. The sooner we can set this plan into action the better. There's no time to waste. I know you (whoever is reading this) knows this, or else you would not be here. I am a junior in high school at Charles Wright Academy. I am EXTREMELY passionate about our environment and more importantly (or specifically, rather, which ever you prefer) the Orcas. I am dedicating my all to protect these astonding beings. I am going to become an Environmental Lawyer in hopes that I can make a postive change (that is sustainable) for the Orcas. If there is ANYTHING I can do, I am more then willing to volunteer. I've worked with many organizations, so I do have some experience. Please don't hesitate to contact me via email. Lets make the postive change happen now, there's no time to waste!!

From: **Gwen Sarandrea**

Comment: Dear Puget Sound Partnership,

Thank you for your hard work to develop a draft Action Agenda to restore, protect and recover Puget Sound to health by 2020. It could not come at a more pressing time, especially for the Sound's iconic and endangered orca whale. Just this month, researchers reported seven orcas "10% of the Puget Sound population" are missing and believed to be dead. Some experts say dwindling populations of endangered Chinook salmon are at least partly to blame. Is this a sign that our ecosystem is on the verge of collapsing?

The urgency of restoring the Sound to health is at a tipping point and missing orcas are the Sound's "canaries in the coal mine," telling us we are running out of time. But there is hope for the orca, as there was hope for the bald eagle, the California Condor and others on the verge of extinction. The Puget Sound Partnership's Action Agenda is a golden opportunity to do what has not been done for

over 20 years- develop and implement a recovery plan that is accountable, effective, transparent and decisive with sustained funding to restore this national treasure to health by 2020.

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-Fund enforcement staff at state agencies and local governments;

-Implement specific, aggressive cleanup plans for polluted waters, including TMDLs;

-Fully fund a permanent year-round rescue tug at Neah Bay for oil spill prevention;

-Acquire critical intact parcels for habitat protection and conservation;

-Set strong requirements for water quantity, such as setting in-stream flow for all major rivers.

BUT, more than a list of Soundwide and Action Area-specific actions, the Partnership must create a real 2020 Action Agenda, not just a 2-year plan, that clearly identifies the specific actions that are needed over the next 12 years and the HOW and WHO and BY WHEN each action must be completed. All the actions need to be tied together into a comprehensive plan with measurable benchmarks and timelines in order to achieve recovery by 2020. The final Action Agenda must:

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For Puget Sound!

From: Tom Saul

Comment: We need to re-address (revise) the tribal treaties that regulate fishing rights and the allocation of fish to commercial fisheries. Boating insurance regulations should be required to cover any type of 'dangerous' spill, and spills should not incur additional penalties for the offender - this would encourage reporting.

From: Shae Savoy

Comment: Hello! I am a resident of Seattle and a student in the Community, Environment and Planning program (CEP) at the University of Washington.

I am writing to submit my requests for your Action Agenda regarding cleaning up the Duwamish River and Puget Sound.

I am relieved to see that the Action Agenda as it stands calls for many important steps to recover Puget Sound, including low-impact development to reduce stormwater pollution, aggressive plans to clean up polluted waterways, and increased funding for environmental compliance, but the draft agenda needs to do more if Puget Sound is to be restored to health by 2010. The Agenda needs to include: stronger pollution prevention plans for toxic chemicals; comprehensive stormwater cleanup programs for cities, industries, construction sites and roadways; and a full 12 year plan with sustained funding and well defined benchmarks to measure progress.

Both the Duwamish River and all of Puget Sound depend on a comprehensive clean up and restoration plan to protect our resources for future generations. Thank you for this opportunity to weigh in on the restoration of our Community!

From: James Scarborough

Comment: Dear Puget Sound Partnership,

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The Partnership must create a real 2020 Action Agenda, not just a 2-year plan that clearly identifies the specific actions that are needed over the next 12 years and the HOW and WHO and BY WHEN each action must be completed. All the actions need to be tied together into a comprehensive whole through measurable benchmarks that must be accomplished in order to achieve recovery by 2020.

I very much appreciate the Partnership's support for Wild and Scenic River designation of the Pratt River and additional wilderness in the Alpine Lakes area. However, I encourage you to support additional Wild and Scenic River and Wilderness designations to protect critical headwater streams and intact forests that play a critical role in ensuring the health of Puget Sound. Dozens of rivers that drain into Puget Sound have already been determined eligible for inclusion in the national Wild and

Scenic Rivers system by federal agencies.

Additionally, the Partnership should include the use of Outstanding Resource Water (ORW) designations under the Clean Water Act as one of the "Near Term Actions" to protect high-quality rivers and other water bodies from degradation. ORW designations permanently protect high quality waters that are ecologically significant, provide cold water refuges for fish, and/or support important recreational values. Many rivers in the Puget Sound region are eligible for ORW designation. Outstanding Resource Waters, Wild and Scenic River and Wilderness designations offer strong protection without a large financial investment.

Finally, the Partnership should include funds to remove two outdated dams on the Elwha River as soon as possible. Additional funding could move up the date of dam removal from 2012 to 2010. The removal of the Glines Canyon and Elwha dams will open up over 70 miles of prime habitat that could once again be home to salmon and steelhead runs numbering in the hundreds of thousands. Dam removal on the Elwha has also been identified as an important action to recover orcas. Finally, dam removal and associated river restoration activities will provide important economic opportunities and jobs for local communities.

Thank you for this opportunity to strengthen a strategy to save Puget Sound.

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Comment: Dear Puget Sound Partnership,

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The urgency of restoring the Sound to health is at a tipping point and missing orcas are the Sound's "canaries in the coal mine," telling us we are running out of time. But there is hope for the orca, as there was hope for the bald eagle, the California Condor and others on the verge of extinction. The Puget Sound Partnership's Action Agenda is a golden opportunity to do what has not been done for over 20 years- develop and implement a recovery plan that is accountable, effective, transparent and decisive with sustained funding to restore this national treasure to health by 2020.

The draft Action Agenda includes many of the essential elements that need to be done:

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BUT, more than a list of Soundwide and Action Area-specific actions, the Partnership must create a real 2020 Action Agenda, not just a 2-year plan, that clearly identifies the specific actions that are needed over the next 12 years and the HOW and WHO and BY WHEN each action must be completed. All the actions need to be tied together into a comprehensive plan with measurable benchmarks and timelines in order to achieve recovery by 2020. The final Action Agenda must:

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For Puget Sound!

From: C. Thomas Schaefer

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The Partnership must create a real 2020 Action Agenda, not just a 2-year plan. Otherwise we will simply be rehashing the two decades of well-intentioned but largely ineffective efforts of the Puget

Sound Water Quality Authority and Puget Sound Action Team. The new agenda must clearly identify the specific actions that are needed over the next 12 years: HOW, BY WHOM, and BY WHEN each action must be completed. Also critically important is the issue of how much money must come from what sources to make it happen. All the actions need to be tied together into a comprehensive whole through measurable benchmarks that must be accomplished in order to achieve recovery by 2020.

Thank you for this opportunity to strengthen a strategy to save Puget Sound.

From: D Schafte

Comment: Dear Puget Sound Partnership,

Thank you for your commitment to developing an Action Agenda for a healthy Puget Sound. From struggling orcas to toxic chemicals in our water, the Sound needs quick and decisive action today. I want to make sure we pass a thriving Puget Sound on to future generations.

I urge the Partnership to incorporate accountability, benchmarks of success, and ample funding into this Agenda.

The draft Action Agenda includes many of the essential elements that need to be accomplished, but in addition, the final Action Agenda must also:

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-Accelerate the restoration of the Elwha River.

Thank you for your hard work to develop a draft Action Agenda to restore, protect and recover Puget Sound to health by 2020.

On behalf of everything from eelgrass to orcas.

From: Katherine Schake

Comment: To Whom it May Concern,

Below is a pre-drafted letter which I completely support. However, I want to add a personal note here at the beginning. I work as a Naturalist Guide in Alaska during the summers, I have lived in Tacoma, WA for a period of time, and now I live in Portland, OR. I also studied Environmental Science at the University of Minnesota. No matter where I am living it is clear to me that ecosystems are delicate and easily disturbed. One simple link, such as a declining orca-whale population, is a warning sign that there are many things out of balance in this ecosystem. It is hard to predict how severe the consequences will be, but it is not only the Puget Sound that will be effected. Thank you for the steps you have gone to already to protect the Puget Sound, but please do not let it rest here. A step-by-step plan for funding and implementation is critical for action to be taken. Otherwise, the necessary changes will not happen.

Sincerely,

Katherine Schake

Dear Puget Sound Partnership,

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For Puget Sound!

From: Christina Schelle

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From: Carol Schiller

Comment: Dear Puget Sound Partnership,

I am a mom of three kids who is extremely concerned about the quality of the environment they will grow up in. The degraded state of the Puget Sound can no longer be tolerated. Reports of missing orcas and what that means for the state of the Sound means we cannot wait any longer. Cleaning up Puget sound MUST be a top priority NOW.

So, I am writing to urge you to improve your action agenda's recommendations on pollution prevention. Action must be swift and it must make real changes in the quality of the water now. Please, I urge you to take the most aggressive possible stance on this.

Thank you very much.

From: John Schmidt

Comment: Dear Puget Sound Partnership,

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On behalf of everything from eelgrass to orcas

PugetSoundPartnership
our sound, our community, our challenge

From: Arnold Schouten

Comment: As a member of the Clallam MRC, Surfrider Foundation, Dry Creek Coalition and a property owner on Dry Creek, I have noticed an absence of protection and restoration of the Dry Creek drainage and near shore in the Action Agenda.

There are many issue facing the Dry Creek riparian corridor and near shore environment. Two of the most pressing issues are the toxic materials leaching from the Port Angeles Landfill and major erosion damage of the Dry Creek waterway and steelhead/salmon habitat resulting from the 1992/1993 Fairchild Airport runway extension. Details of these two issues can be found on the Dry Creek Coalition website, under the heading Coalition : http://drycreekcommunity.org/index.php. Please add Dry Creek to the Action Agenda. It certainly qualifies as a Strategic Priority: protecting and restoring ecosystem processes and reducing sources of water pollution.

From: Pete Schroeder

Comment: For 18 years I have lived on a one acre bluff lot (including tidelands)overlooking Dungeness Bay, the Dungeness Spit and the Strait of Juan de Fuca. I also have a five acre farm on the Dungeness River, which is in a conservation easement. I wish you the best of luck in implementing 2020 Puget Sound Action Agenda.

Please include a Glossary of terms in the final Action Agenda. First I want to complement and congratulate PSP for compiling a meaningful and significant set of documents in a relatively short time. It appears the circular, iterative process of compiling an action agenda with the science plan is designed to continue for the near and long term. I believe that the sooner linear projects with goals, objectives and a product get started, within the described framework, the sooner the circular process can be proofed and ground tested.

My comments are Region wide, even though I have been an active participant in the Straits Action Area Workshops. Thank you for the opportunity to comment on the Draft 2020 Action Agenda for Puget Sound. I wish to comment from two perspectives, that I believe are synergystic. Basically I've been wearing two hats during the recent PSP process. I am J. Pete Schroeder, DVM, Lead Entity Advisory Group Designee to the Washington Forum on Monitoring Salmon Recovery and Watershed Health.

In that capacity I attended the Forum's Monitoring Workshop and meeting June 20-21, 2007, and each subsequent Forum and LEAG meeting and workshop to date. Additionally, I have participated in the Strait of Juan de Fuca Action Area public and ad hoc Work Group meetings, Clallam County Lead Entity Group meetings, a PSP Leadership Council meeting and the PSP Local Integration Workshop, November 6, 2008.

I have provided verbal input during most of these meetings. I became a board member of the North Olympic Salmon Coalition, one of the Regional Fisheries Enhancement Groups in early 1992. That describes my volunteer hat in this process.

My scientific hat is as the Director of Research for Global Research and Rescue, www.grrescue.com, a non-profit group dedicated to the recovery of the endangered Southern Resident Killer Whale

population (SRKW). I provided input to the recovery plan process as a contract Technical Writer for NMFS Northwest Regional Office's 2008 Recovery Plan for Southern Resident Killer Whales (Orcinus orca), concentrating on the environmental contaminant, disease and research sections.

During 2006 to 2008, I've been partially funded as co-principal investigator of a basic research program with the objective of determining base lines of pathogen indicators through microbial culture and molecular screening of exhaled breaths of SRKW and pathogen screening of the Sea-Surface Microlayer at specific sites around the San Juan Islands. . Raverty, S., E. Zabek, J.P. Schroeder, R. Wood, D.E. Bain, C.E. Cameron, 2007.

Preliminary Investigation into the Microbial Culture and Molecular Screening of Exhaled Breaths of Southern Resident Killer Whales (Orcinus orca) and Pathogen Screening of the Sea-Surface Microlayer (SML) and Sub-Surface water Samples in Washington State. Proceedings of the 38th Annual Convention of The International Association for Aquatic Animal Medicine, May 5-9, Lake Buena Vista, FL. p. 97-98 Additional findings based on additional cruises during 2007 have been reported to NWFSC, with these recommendations, which I believe are applicable to consideration as a status and trends indicator: It is recommended to continue searching for antibiotic resistant bacteria to document if Table 1 data, (not included here, available upon request), can be reproduced, and to monitor the status and trends of antibiotic resistant bacteria in the critical habitat of the SRKW.

It is important to determine the source of antibiotic resistant pathogens to determine if they originate from an unappreciated reservoir of antibiotic-resistance determinants that can contribute to the increasing levels of multiple antibiotic resistances in pathogenic bacteria (Dantas, et al., 2008). Undocumented releases of potential contaminants from various types of vessel traffic in the entire Puget Sound region is of concern. Source tracking of coliform bacteria is possible, (pers. communication, 2008, Dana Woodruff) and that technology may be developed and applied to other potentially harmful bacteria and/or fungi.

For example, if an infection were to be determined as the cause of illness/death of a killer whale, and that infectious agent could be tracked to a specific source, management of that source could be recommended and implemented. It will be possible, and strongly recommended, to monitor the health of the SRKW and to build a health profile and health assessment of individual members, starting with the adult males and continuing to reproductively mature female orcas, including these objective data points.

It is critically important to be able to identify clinical signs of stress and/or infectious disease processes in marine mammals (Schroeder, J.P., 1987). Schroeder, J.P., 1987. Marine Mammal Health Management based on Immune System Response to Stress and Infectious Disease, (abst.) 7th Biennial Conf. On the Biology of Marine Mammalogy, Miami Fl. p 81. The results presented in Cameron et al., 2008, Cameron, E.C., R.L. Zuerner, S. Raverty, K.M. Colegrove, S.A. Norman, D.M. Lambourn, S. Jeffries, and F.M. Gulland. 2008. Detection of Pathogenic Leptospira Bacteria in Pinniped Populations via PCR and Identification of a Source of Transmission for Zoonotic Leptospirosis in the Marine Environment. Jnl. of Clinical Microbiology, Vol. 46, No. 5, p. 1728-1733. definitively establish that PCR techniques can be successfully used to detect pathogen presence in marine mammal populations.

Similar analyses have been conducted on SML water samples and orca breath samples in this project with analogous results, and future studies will continue to incorporate these molecular analyses as a

tool to enable pathogen detection.

The confirmation of findings of Clostridium perfringens and Vibrio sp. is significant from SRKW recovery management and public health standpoints. SEA SURFACE MICROLAYER RESULTS: SML samples, n=8, 2007, and n=10, 2006, were collected from San Juan waters. SML samples, n=6, 2007, were collected from Johnstone Strait, Canada for control. Both locations provided a wide variety of fungi as well as some bacteria.

Two 2007, San Juan samples were positive for Pseudomonas sp. and five were positive for Clostridium perfringens. All of the samples were negative for Salmonella species. Additional results of 2007 SML sampling indicated: Standard Plate Count/CFU/ml ranged from &lt1 to 204. Total Coliforms/100mL ranged from &gt1 to 6, and &lt1 CFU/100ml for Fecal Coliforms and Escherichia coli. Fungi findings are not included. Partial SML sampling results for 2008 confirm 2006 and 2007 results and techniques.

Sampling Year Water Sample # (date collected) Bacterium Potential human/animal pathogen? Detected all three years? 2006 1 (Aug. 31, 2006) Psychrobacter sp. 2006 3 (Aug. 31, 2006) Pseudoalteromonas yes 2007 1 (Oct. 2, 2007) Clostridium perfringens yes 2007 1, 3, 4, 5 (Oct. 2, 2007)2 (Oct. 16, 2007) Vibrio yes yes 2007 1 (Oct. 2, 2007) Leeuwenhoekiella or Antarctic bacterium 2007 1, 4, 5 (Oct. 2, 2007)2 (Oct. 16, 2007) Cobetia or Halomonas yes 2007 2, 3, 4, 5, 6 (Oct. 2, 2007)2 (Oct. 16, 2007) Pseudoalteromonas yes 2007 2, 4 (Oct. 2, 2007) Alteromonas yes 2007 3 (Oct. 2, 2007)1 (Oct. 16, 2007) Marine gamma proteobacterium yes 2007 6 (Oct. 2, 2007) Marinomonas yes 2007 2 (Oct. 16, 2007) Exiguobacterium 2007 2 (Oct. 16, 2007) sponge bacterium 2007 2 (Oct. 16, 2007) Moritella 2007 2 (Oct. 16, 2007) Gelidibacter 2008 WPT 69.08, 70.08, 102.08, 103.08 (Jun. 23, 2008) Pseudoalteromonas yes 2008 WPT 69.08, 70.08, 102.08, (Jun. 23, 2008) Marine proteobacterium yes 2008 WPT 69.08, (Jun. 23, 2008) Halomonas yes There is generally good agreement on the genera of microbes detected from SML from year to year.

This provides validation of the sampling method, acknowledging that there is some selection due to the culture media and conditions. Although the breath samples exhibit some overlap with the SML results, there are important differences in microbial species. This is further validation of the approach and methods. Further analysis will be carried out. As an example, using SML data from Sept-October 2007, and setting each genus (both bacterial and fungal) as a variable (for a total of 21 variables), a difference matrix for the percentage of microbial genera at each site can be calculated and Euclidean distances among all the points scaled and plotted.

The initial plot shows that the waypoints along the shoreline of San Juan Island (70, 102, 101, 103) were closer together, and the more distant waypoints (Turn Point - 69; Hein Bank - 92; Friday Harbor - 106) were separated from each other and the shoreline cluster. So the physically closer SML waypoints exhibited more similar microbial composition than the physically distant ones. Furthermore, the physically distant ones were also different from each other in microbial composition.

This kind of approach might be useful for a variety of comparisons. I hope the above partial description will influence the Science Panel to do two things, 1, use a component, or components of the SML as indicators of status and trends, and 2, address, in addition to TMDL, as an indicator of bacterial pollution, other pathogen analysis. I am concerned that the air water interface, also defined as the Sea-Surface Microlayer, is not mentioned in the Action Agenda or the science plan. I strongly support the recommendations of the Strait of Juan de Fuca Action Area Work Group, especially the insertion of the word pathogen. I also strongly support the comments of the Clallam County Lead

Entity Group and the Technical Advisory Group. I believe the success of reaching the Partnership's goals will be greatly enhanced by collaborative science and moving ecosystem-based management forward in Puget Sound as so well out lined by Michelle McClure and Mary Ruckelshaus. Thank you for this opportunity to present my comments.

From: Betsy Schultz

Comment: We don't live by the sound but do sail our boat there. All efforts must be made to reverse the toxic flow and rescue the health of Puget sound before it is too late.

From: Kerrie Schurr

Comment: Dear Puget Sound Partnership,

I support the major recommendations of your agenda.

In addition, please include strong provisions on pollution prevention in your action agenda for Puget Sound. These proposals should include increasing the availability of technical assistance to help businesses reduce chemical use, developing a state program to focus on researching safer chemicals and materials, and requiring better industry reporting of the chemicals currently being used.

And finally, please include a public education component aimed at teaching children and adults how they can reduce their toxics use, protect habitats, and take other measures to protect Puget Sound.

P.S. I worked on the plan for the first Sound-wide pollutant monitoring program for Puget Sound back in the late 1980's, as an employee of EPA Region 10. It is sad that the orcas are doing so poorly, and that there is still so far to go in protecting the Sound.

From: Mike Schutt

Comment: Dear Puget Sound Partnership,

As a Professional Biologist and life-long resident of Puget Sound, I am writing to urge you to improve your action agenda's recommendations on pollution prevention. Pacific Salmon and resident Orcas need a cleaner Puget Sound, or they will not survive.

From: Harvey Schwartz

Comment: Dear Puget Sound Partnership,

I am writing to urge you to improve your action agenda's recommendations on pollution prevention.

From: Michael Sear

Comment: I believe the illegal discharge of sewage into Puget Sound from recreational/private boats still remains a pollution problem. It is a difficult law/problem to enforce when a weekend boater or live abound opens the Y-valve from the holding tank instead of using a pumpout station. If this problem is included in the draft agenda that is great, if not it should be added as a contibutor to Puget Sound pollution.

From: Kim Secunda

Comment: I live on Orcas Island where we have lost 8 orcas this season. We have seen this crisis forming for a long time now and we MUST act. I am in accord with the efforts to salvage our ecosystem. I am especially in agreement with any habitat restoration dam removal, water/wastewater cleanup ,indstrial and residential conservation and toxin reduction, mass transit and sustainable technology development. Perhaps bulit in incentives and a system of carbon credit would be worth exploring. It would be important to have a styrofoam ban and a pharmacueticals disposal system in place in our state. Do please enforce your agenda and follow through, the short term consumer discomforts far outwiegh the dire results of our past misakes. I truly appreciate your consolidated approach and attempt at effiecient cooperation, thank you.

From: Spencer Selander

Comment: Dear Puget Sound Partnership,

Thank you for your commitment to developing an Action Agenda for a healthy Puget Sound. From struggling orcas to toxic chemicals in our water, the Sound needs quick and decisive action today. I want to make sure we pass a thriving Puget Sound on to future generations.

I urge the Partnership to incorporate accountability, benchmarks of success, and ample funding into this Agenda.

The draft Action Agenda includes many of the essential elements that need to be accomplished, but in addition, the final Action Agenda must also:

-Amend the Cruise Ship MOU to ban all cruise ship discharges in Puget Sound;

-Prioritize the protection and restoration of the State's forage fish spawning beds;

-Complete the Management Plan for the Cherry Point Aquatic Reserve;

-Identify adequate and sustained funding for Plan implementation;

-Update the guidance for open water dredge disposal of PCBs;

-Expand the indicator species to include forage fish abundance and harbor seal toxics loading; and

-Accelerate the restoration of the Elwha River.

Thank you for your hard work to develop a draft Action Agenda to restore, protect and recover Puget Sound to health by 2020.

On behalf of everything from eelgrass to orcas.

From: Jen Semsak

Comment: Dear Puget Sound Partnership,

I am writing to urge you to improve your action agenda's recommendations on pollution prevention. Washington state spends tens of millions of dollars each year cleaning up pollution and billions of dollars each year in health care costs treating diseases linked to environmental pollutants. Yet, at the same time polluters continue to use toxic chemicals that contaminate Puget Sound and our bodies, without paying for the true cost of their pollution. It's time wildlife and taxpayers got off this toxic treadmill.

The current draft of the action plan does not include provisions that will help move Washington's businesses toward safer alternatives and away from chemicals known to be harmful. These proposals should include increasing the availability of technical assistance to help businesses reduce chemical use, developing a state program to focus on researching safer chemicals and materials, and requiring better industry reporting of the chemicals currently being used.

From: Shannon Serrano

Comment: Dear Puget Sound Partnership,

Thank you for tackling the enormous challenge of saving Puget Sound head on. We appreciate your boldness and your efforts to engage the broader community, to listen to us and to base your decisions on science.

Surfrider Foundation is committed to supporting your efforts, primarily by encouraging people to get out in the watershed and into the Sound, to enjoy it, to appreciate it and to take action to protect and restore it. Through projects like Rise Above Plastics, beach clean ups and ocean friendly gardens, we will do our best to promote Sound stewardship practices.

In order to make sure that we reach our goal of a healthy Puget Sound by 2020, we ask that you strengthen the Action Agenda by incorporating the following recommendations:

- Be stronger on water quality measures by offering a comprehensive and robust program to prevent all sources of stormwater pollution and strengthening the list of actions for toxic pollution prevention.

- Develop different indicators for human well-being to include more opportunity for quality water-based recreation through increased shoreline access, clean beaches, and clean water.

- Be stronger on accountability by incorporating clear benchmarks to get us to a healthy Puget Sound

by 2020.

- Create more opportunities and stronger protection programs to improve the public's interaction with the shoreline and achieve enough water quality improvement and habitat restoration to inspire the public to go to the water's edge more frequently.

- Ensure that there is enough funding for Puget Sound to achieve the goals laid out in this ambitious agenda.

Thank you for your hard work to develop a draft Action Agenda to restore, protect and recover Puget Sound to health by 2020.

From: Ken Sethney

Comment: I am writing to support and endorse the comments previously submitted by Bob Benze, Environmental Engineer, Silverdale, WA.

The goals of the Puget Sound Partnership are admirable, and we appreciate the work that has been done by all involved, but the proposed actions are unlikely to yield the results we all want and need. Bob's thoughtful analysis clearly states why we need more science and less speculation as we move forward topreserve and restore this complex environmental system.

From: Ken Sethney

Comment: I read the draft Action Agenda with great interest. Each of the goals is laudable, but I am concerned about some of the recommendations. Question 3, Page 4 suggests that residential bulkheads and docks should be discouraged or eventually banned because, "The act of putting in a dock or building a bulkhead [could very well] make it more difficult for our starving resident orca to find food." Based on existing research, it is just as likely that the act of putting in a dock or building a bulkhead [could very well] make it easier for our starving resident orca to find food. But whatever the environmental effect, the economic effect is more predictable, by requiring conditional use permits, the cost of constructing or remodeling on the waterfront will increase. Eventually, only the super rich will be able to enjoy the extraordinary opportunity of living on the shoreline. Today's economically diverse shoreline population is threatened and will will surely become ext inct.

From: Jennifer Shafer

Comment: Dear Puget Sound Partnership,

I am writing to urge you to improve your action agenda's recommendations on pollution prevention.

From: Donald Shank

Comment: Dear Puget Sound Partnership,

Thank you for your hard work to develop a draft Action Agenda to restore, protect and recover Puget Sound to health by 2020. It could not come at a more pressing time, especially for the Sound's iconic and endangered orca whale. Just this month, researchers reported seven orcas "10% of the Puget Sound population" are missing and believed to be dead. Some experts say dwindling populations of endangered Chinook salmon are at least partly to blame. Is this a sign that our ecosystem is on the verge of collapsing?

The urgency of restoring the Sound to health is at a tipping point and missing orcas are the Sound's "canaries in the coal mine," telling us we are running out of time. But there is hope for the orca, as there was hope for the bald eagle, the California Condor and others on the verge of extinction. The Puget Sound Partnership's Action Agenda is a golden opportunity to do what has not been done for over 20 years- develop and implement a recovery plan that is accountable, effective, transparent and decisive with sustained funding to restore this national treasure to health by 2020.

The draft Action Agenda includes many of the essential elements that need to be done:

-Require low-impact development to reduce stormwater pollution;

-Prohibit new bulkheads near feeder bluffs and forage fish spawning beaches;

-Fund local governments to develop and carry out shoreline master programs;

-Fund enforcement staff at state agencies and local governments;

-Implement specific, aggressive cleanup plans for polluted waters, including TMDLs;

-Fully fund a permanent year-round rescue tug at Neah Bay for oil spill prevention;

-Acquire critical intact parcels for habitat protection and conservation;

-Set strong requirements for water quantity, such as setting in-stream flow for all major rivers.

BUT, more than a list of Soundwide and Action Area-specific actions, the Partnership must create a real 2020 Action Agenda, not just a 2-year plan, that clearly identifies the specific actions that are needed over the next 12 years and the HOW and WHO and BY WHEN each action must be completed. All the actions need to be tied together into a comprehensive plan with measurable benchmarks and timelines in order to achieve recovery by 2020. The final Action Agenda must:

-Clearly identify timelines and responsibilities;

-Identify adequate and sustained funding for the long haul;

-Be a visionary and long term plan;

-Be based on science;

-Offer a comprehensive and robust program to prevent all sources of stormwater pollution, not just

municipal stormwater;

-Strengthen the list of actions for toxic pollution prevention;

-Set meaningful standards for habitat protection;

-Balance regulatory change with land acquisition to accomplish long term recovery goals;

-Expand the indicator species to include more than just salmon, i.e. forage fish, harbor seals, etc.

The Partnership staff, the Leadership Council, Ecosystem Coordinating Board, Science Panel and stakeholders throughout the Sound deserve praise for the monumental effort involved in producing the draft Action Agenda. The next step is secure much needed funding. The 2009 legislature must adopt new funding sources dedicated to the recovery of Puget Sound by 2020.

For Puget Sound!

From: Lisa Sharp

Comment: Dear Puget Sound Partnership,

I am writing to urge you to improve your action agenda's recommendations on pollution prevention.

Please ensure that the orca pod in the pugent sound receives the highest level of protection we can generate in order that it might remain a part of our beautiful and very special eco-system!

My children thank you...their children will one day thank you!

I thank you

From: Diane Shaughnessy

Comment: Dear Puget Sound Partnership,

I am writing to urge you to improve your action agenda’s recommendations on pollution prevention.

From: Joan Shelby

Comment: Dear Puget Sound Partnership,

I am writing to urge you to improve your action agenda’s recommendations on pollution prevention.

From: Anita Shelton

Comment: Dear Puget Sound Partnership,

I am writing to urge you to improve your action agenda's recommendations on pollution prevention. Puget Sound's Orcas are important to our community for environmental, ethical, and economic reasons including tourism. We must do all we can to preserve this valuable species, which is slow to reproduce.

From: Sydney Shera

Comment: Dear Puget Sound Partnership,

The Partnership staff, the Leadership Council, Ecosystem Coordinating Board, Science Panel and stakeholders throughout the Sound deserve praise for the monumental effort involved in producing the draft Action Agenda. The next step is to finalize a plan that is accountable, transparent, effective and have dedicated new funding sources to the recovery of Puget Sound by 2020.

The Partnership must create a real 2020 Action Agenda, not just a 2-year plan that clearly identifies the specific actions that are needed over the next 12 years and the HOW and WHO and BY WHEN each action must be completed. All the actions need to be tied together into a comprehensive whole through measurable benchmarks that must be accomplished in order to achieve recovery by 2020.

Thank you for this opportunity to strengthen a strategy to save Puget Sound.

From: Richard Shield

Comment: Dear Puget Sound Partnership,

I am writing to urge you to improve your action agenda's recommendations on pollution prevention.

From: Linda Shoemaker

Comment: Dear Puget Sound Partnership,

I am writing to urge you to improve your action agenda's recommendations on pollution prevention.

The orcas of Puget Sound, in truth, belong to the world. All of us, worldwide have an interest in this population, just as we do in the cod of the North Sea or the oysters of the Chesapeake Bay, and on and on. This is urgent! We need to improve whatever is within our reach.

We need to KNOW the chemicals being used by companies so their effects can be monitored; we need statewide/nationwide/and worldwide programs to research beneficial, non-polluting chemicals, and we need to assist all industry in developing earth-friendly chemicals; AND we need to legislate these provisions. Thank you for considering all of this. "Yes, we can!"

From: Forest Shomer

Comment: Dear Puget Sound Partnership,

I am writing to urge you to improve your action agenda's recommendations on pollution prevention.

From: Forest Shomer

Comment: Dear Leadership Council,

Thank you for the opportunity to comment on the Puget Sound Partnership Draft Action Agenda. I appreciate the tremendous amount of work that has gone into developing it and I support the strong list of measures that, if implemented, will go a long way toward recovering Puget Sound by 2020.

The draft plan includes a few omissions. The final plan should include Outstanding Resource Water (ORW) designation under the Clean Water Act as a tool to help protect rivers and other aquatic habitat. While I strongly support the inclusion of Wild and Scenic designation as a similar tool, in some cases ORW designation will likely prove to be a better, more immediate way for the state to ensure the protection of high quality rivers and other waters. Therefore, I urge the Partnership to include support for the Outstanding Resource Water designation as one of its "Near Term Actions." ORW designations permanently protect high quality waters that are ecologically significant, provide cold water refuges for fish, and/or support important recreational values. Many rivers in the Puget Sound region are eligible for ORW designation. I would also like to encourage you to include funds to move up the removal of the two dams on the Elwha from 2012 to 2010. Removal of the Elwha dams is one of the best chances for salmon and steelhead recovery in the region as it will open up over 70 miles of prime spawning habitat. Removing these dams has also been as a key action to recover our Puget Sound's orca population, which is malnourished thanks to a lack of chinook salmon.

Especially during difficult financial times, finding opportunities for economic benefit and job creation is important. Removing the Elwha dams provides a tremendous opportunity for creating "green jobs" and numerous other economic benefits.

Thank you for taking my comments into consideration.

From: **David Sielaff**

Comment: Dear Puget Sound Partnership,

I am writing to urge you to improve your action agenda's recommendations on pollution prevention. I want a healthy Puget Sound to be part of the legacy we leave our children.

Many Washington manufacturers continue to use harmful chemicals without any plans to switch to chemicals that are safer for Puget Sound. To protect public health and the environment, Washington's industry must begin phasing out of the worst toxic chemicals and developing plans to switch to safer alternatives.

Please include recommendations to help move Washington's businesses toward safer alternatives and away from chemicals known to be harmful to Puget Sound. These proposals should include:

Increasing the availability of technical assistance to help businesses reduce chemical use.

Developing a state program to focus on researching safer chemicals and materials.

Requiring better industry reporting to Ecology of the chemicals currently being used.

From: **Bri Silbaugh**

Comment: Dear Puget Sound Partnership,

Thank you for tackling the enormous challenge of saving Puget Sound head on. We appreciate your boldness and your efforts to engage the broader community, to listen to us and to base your decisions on science.

Surfrider Foundation is committed to supporting your efforts, primarily by encouraging people to get out in the watershed and into the Sound, to enjoy it, to appreciate it and to take action to protect and restore it. Through projects like Rise Above Plastics, beach clean ups and ocean friendly gardens, we will do our best to promote Sound stewardship practices.

In order to make sure that we reach our goal of a healthy Puget Sound by 2020, we ask that you strengthen the Action Agenda by incorporating the following recommendations:

- Be stronger on water quality measures by offering a comprehensive and robust program to prevent all sources of stormwater pollution and strengthening the list of actions for toxic pollution prevention.

- Develop different indicators for human well-being to include more opportunity for quality water-based recreation through increased shoreline access, clean beaches, and clean water.

- Be stronger on accountability by incorporating clear benchmarks to get us to a healthy Puget Sound by 2020.

- Create more opportunities and stronger protection programs to improve the public's interaction with the shoreline and achieve enough water quality improvement and habitat restoration to inspire the public to go to the water's edge more frequently.

- Ensure that there is enough funding for Puget Sound to achieve the goals laid out in this ambitious agenda.

Thank you for your hard work to develop a draft Action Agenda to restore, protect and recover Puget Sound to health by 2020.

I really appreciate the Puget Sound Partnership Shifting Baselines video and have shown it to a crowd at a local Surfrider NWS event to raise money to help in efforts to protect the sound.

Important note:

I am employed by the City of Bellingham and the Dept. of Ecology as part of the Local Source Control Partnership which falls in step with the Puget Sound Partnership and the Puget Sound Initiative. This means that my job is based on going out in the field to help small businesses reduce hazardous waste streams and prevent pollution to the Puget Sound. Having visited dry cleaners, boat repair shops, boatyards, marinas, and auto body shops I have become very keen on stormwater related issues relating to business practices.

Here is a list of actions that I think will have an impact on water quality in the puget sound.

- Work with the Department of Ecology, Clean Marina Program, and the Puget Sound Keeper Alliance to assure that we move quickly to install treatment systems to pretreat stormwater that drains off the boatyard asphalt. Ecology has completed a study to look at efficiencies of different water quality treatment systems but this program needs to keep moving quickly in the right direction to have these pretreatment sytems put in at facilities that have Ecology's Boatyard General Permit.

- Car and boat washing is a big topic that has recently come onto the scene with residents and businesses. We need to keep providing education to all people that letting soapy water (even if it is biodegradable) can not go to the storm water systems.

- One last point is that we need to educate all people to understand that dumping any waste other then rainwater down the storm drain is a big problem which can result in a fine. Also letting people know that Stormwater, atleast in the City of Bellingham does not go through any treatment before it hits the Bay. People do not know this fact, which is alarming to those who work in the environmental field.

Thank you for your hard work and please keep making real progress and please contact me if further information is needed.

From: **Jill Silver**

Comment: Dear PSP:

Thank you for the opportunity to provide comment on the Action Agenda. It is inspiring to see so much concentrated effort focused on restoring and protecting this vital resource. I grew up here on the Sound. The recent loss of the seven orcas was an intensely painful reminder that we're losing this incredible set of resources we have.

There are some building blocks that are necessary to establish so that the agenda can be the most

effective possible. Without these, there will continue to be an erosion of physical habitat and continued degradation of condition of species and resources. As briefly as I can, I'd like to comment on four key issues:

1. Financial support for cash-strapped local governments

2. Financial and technical support for mapping sensitive resources so that they can be protected during development

3. Financial support for the inclusion of low impact development into county development codes, with offices to assist permit seekers and developers.

4. Inclusion of existing invasive plants into the agenda's section A.5

Financial support for local governments: Development, community, and industrial activities on the local level are the primary impacts to Sound resources and habitat. The local governments' ability to fund the permitting, review, compliance, enforcement, and monitoring required to ensure protection of nearshore and upland resources that flow into the nearshore and Sound must be increased. In Jefferson County this past week, six great staff people were laid off the Department of Community Development's staff. They were already short-staffed – having no staff to review streams or evaluate fish passage, and no one to conduct compliance or effectiveness reviews of permits or mitigation success. How can we hope to stem the tide of impact if we can't review proposals on the ground, and offer permit seekers appropriate guidance for protecting our public resources?

Financial and technical support for mapping sensitive resources: We're getting wetlands mapped by a VOLUNTEER! I've personally spoken with EPA and DOE, and there are NO grant programs to support mapping. This is a critical baseline component to the Agenda. We have no-one mapping streams! Many of the first and second order streams are not mapped – and lowland small streams are critical habitats for juvenile salmon in the winter. DOE recently documented usage in a number of small streams, relative to the water quantity and instream flow issues. These streams are at risk of many impacts from development without identification, and the impacts then flow into the Sound. We need a coordinated LiDAR flight that adds wetlands, small streams, and floodplains, as well as for geologic hazards to the existing GIS layers. We need the staff, as well as the ability to update the GIS maps with new permit or mapping data. We need BIG government to help us do this – it's more cost-effective on a larger scale – and we have no money, and no possibility to raise any more. Clallam has some LiDAR, Jefferson has a tiny bit, Mason needs it, and so on.

Financial support for the inclusion of low impact development into county development codes, with offices to assist permit seekers and developers: The new stormwater manual, ordinance, and LID recommendations will remain shelved until Jefferson County is provided with enough funding to put them on the ground. There's no time to waste!

Inclusion of existing invasive plants into the agenda's section A.5: As a member of the Jefferson County Noxious Weed Board, and an active volunteer on weed issues on the Olympic Peninsula – I urge you to incorporate language addressing the need to manage, control, and eradicate existing invasive plants that are causing water quality and habitat degradation – and that are spreading rapidly without control These include reed canarygrass, purple loosestrife, spartina, elodea, knotweed species, buddlea (butterfly bush), and others. These non-native plants are widely spread along Hood Canal and Puget Sound, and are replacing native vegetative communities without providing the same

services to the species that depend on native plants, nutrients, bugs, and habitat structures. The more they spread, the more we have to rely on pesticides, which, even when 'aquatically-approved', may have long-term and sub-lethal effects on some species. We have a budget of only $12,000 this year – not even enough for a staff member. Grant funding is obtainable for some of these plants and specific habitats, but we must have the language in the PSP to be able to show it's an issue of importance.

Thank you for considering these comments. Thank you for all the effort!

From: **Katheryn Silverthorn**

Comment: I am a consultant now representing Marine Habitat Consultants Inc. We want to ensure that all current and future conservation efforts help support the 2020 Action Agenda for Puget Sound and that we contribute significantly to enhanced monitoring and educational efforts in the restoration of our Sound.

From: **Rich Simms**

Comment: Dear Leadership Council,

Thank you for the opportunity to comment on the Puget Sound Partnership Draft Action Agenda. I appreciate the tremendous amount of work that has gone into developing it and I support the strong list of measures that, if implemented, will go a long way toward recovering Puget Sound by 2020.

The draft plan includes a few omissions. The final plan should include Outstanding Resource Water (ORW) designation under the Clean Water Act as a tool to help protect rivers and other aquatic habitat. While I strongly support the inclusion of Wild and Scenic designation as a similar tool, in some cases ORW designation will likely prove to be a better, more immediate way for the state to ensure the protection of high quality rivers and other waters. Therefore, I urge the Partnership to include support for the Outstanding Resource Water designation as one of its "Near Term Actions." ORW designations permanently protect high quality waters that are ecologically significant, provide cold water refuges for fish, and/or support important recreational values. Many rivers in the Puget Sound region are eligible for ORW designation.

I would also like to encourage you to include funds to move up the removal of the two dams on the Elwha from 2012 to 2010. Removal of the Elwha dams is one of the best chances for salmon and steelhead recovery in the region as it will open up over 70 miles of prime spawning habitat. Removing these dams has also been as a key action to recover our Puget Sound's orca population, which is malnourished thanks to a lack of chinook salmon.

Especially during difficult financial times, finding opportunities for economic benefit and job creation is important. Removing the Elwha dams provides a tremendous opportunity for creating "green jobs" and numerous other economic benefits.

Thank you for taking my comments into consideration.

From: **David Sims**

Comment: Dear Puget Sound Partnership,

The Partnership staff, the Leadership Council, Ecosystem Coordinating Board, Science Panel and stakeholders throughout the Sound deserve praise for the monumental effort involved in producing the draft Action Agenda. The next step is to finalize a plan that is accountable, transparent, effective and have dedicated new funding sources to the recovery of Puget Sound by 2020.

The Partnership must create a real 2020 Action Agenda, not just a 2-year plan that clearly identifies the specific actions that are needed over the next 12 years and the HOW and WHO and BY WHEN each action must be completed. All the actions need to be tied together into a comprehensive whole through measurable benchmarks that must be accomplished in order to achieve recovery by 2020.

Thank you for this opportunity to strengthen a strategy to save Puget Sound.

From: **Brian Skahill**

Comment: To Whom It May Concern:

With respect to building capacity and related activities, rather than direct resources to potentially costly and time consuming model development activities, it may very well be worth significant cost savings to explore already available options; for example, to evaluate existing modeling and analysis tools and personnel resources available through the US Army Corps of Engineers and its research organization the US Army Engineer Research and Development Center.

From: **Byron Skaurud**

Comment: Today's article in the Olympian identified petroleum products from our transportation system as a major polluter. I can see why when I see the puddles of oil left on the roads by garbage trucks, delivery trucks and service vehicles. These oils are both engine oil and hydraulic oil. There needs to be some kind of policing of these vehicles, preferably by the owners, but if necessary, by some regulatory agency. An inventory of a company's oil consumption would give you an idea of how much oil they're dumping on our streets. Start with LeMay!

From: **Gloria Skouge**

Comment: Dear Puget Sound Partnership,

Thank you for your commitment to developing an Action Agenda for a healthy Puget Sound. From struggling orcas to toxic chemicals in our water, the Sound needs quick and decisive action today. I want to make sure we pass a thriving Puget Sound on to future generations.

I urge the Partnership to incorporate accountability, benchmarks of success, and ample funding into this Agenda.

The draft Action Agenda includes many of the essential elements that need to be accomplished, but in

addition, the final Action Agenda must also:

-Amend the Cruise Ship MOU to ban all cruise ship discharges in Puget Sound;

-Prioritize the protection and restoration of the State's forage fish spawning beds;

-Complete the Management Plan for the Cherry Point Aquatic Reserve;

-Identify adequate and sustained funding for Plan implementation;

-Update the guidance for open water dredge disposal of PCBs;

-Expand the indicator species to include forage fish abundance and harbor seal toxics loading; and

-Accelerate the restoration of the Elwha River.

Thank you for your hard work to develop a draft Action Agenda to restore, protect and recover Puget Sound to health by 2020.

On behalf of everything from eelgrass to orcas.

From: **Randy Sleight**

Comment: It appears that from your own data, I can not arrive at the stated million pounds of metals going into Puget Sound annually from urban stormwater runoff.

At 1 to 4 pounds/lane mile for metals on average off of roadways that comprise over 30 percent of the effective impervious surface the numbers don't add up. Especially, if you account for the miles of roads that are being treated for source control etc. in CB's and filter systems.

A far larger problem from a loading standpoint to Puget Sound is native sediment from natural and man made processes such as landslides and channel migration loading from eroded river banks in the upper watersheds that are harvested on slopes less than 70% without regard to slope protection in the DNR Board Manual.

From: **Lynae Slinden**

Comment: Dear Partnership Members:

The Action Agenda that was recently circulated for review contains many important and worthy goals for the Puget Sound Partnership. The Port District of South Whidbey Island has no issue with these goals. The challenge we have with the document is that it is rather thin on descriptions of how those goals can be accomplished. From our perspective, the highest value the Puget Sound Partnership can add toward cleaning up the Sound is one of effectively coordinating the various agencies charged with keeping its eco-system healthy. Sadly, this coordination has been virtually non-existent.

A recent experience of the Port of South Whidbey serves well to describe how this lack of coordination significantly delayed a clean-up project for which funding and capability had been secured. In September of 2008 the Washington State Department of Natural Resources (DNR) offered the Port

the opportunity to remove a derelict dock within its district at no cost. The DNR had another project in the works that was in close geographic proximity to the Port's project and potential efficiencies for a dual-sited clean-up project were high. However, the Port had also been developing expansion plans for a harbor facility within its district for which, due to project timing and funding issues, it had yet to secure the appropriate permits. Throughout the planning phases of the expanded harbor project the Port had been keenly aware that it would be required to mitigate for the increased shading caused by the expansion. From a financial perspective, the good news was that we had an existing condition, namely the derelict dock and other ecologically damaging material, that could be removed to provide the necessary mitigation. The Port considered this a positive situation because finding and completing mitigation projects that are outside the jurisdictional boundaries of the agency requesting a permit can be very logistically complicated and expensive. Everything seemed to be lining up nicely to move ahead with the port accepting the DNR's free cleanup offer that would have made the Sound much healthier by doing two projects instead of one.

Then we started running into bureaucratic challenges. Since the Port had not yet received its permit, the Army Corps of Engineers, following policy, refused to let the Port apply the mitigation credits gained by the removal of the derelict dock toward the expansion project. The Port needed to be able to apply the value of the mitigation to its marina construction. It did not have any other potential mitigation projects within its boundaries and knew of no potential project beyond its boundaries. In short, due to a lack of coordination between state and federal agencies, timing and unknown cost, the Port made the decision to "bank" the mitigation in the water. As a result, creosote-soaked piles remain in the waters of Puget Sound waiting for our project to proceed.

There is a solution to this challenge. It is a solution that will encourage the removal of toxics from the sound at a faster rate than is currently happening. It is a solution that can help fund the Puget Sound Partnership and enable it to more rapidly achieve its goals. It is a solution that will make environmental clean-up achievable by individual shoreline owners, businesses, and small and large agencies alike. Conceptually, this solution is very similar to the trading of carbon credits that has helped clean our atmosphere. The solution is to provide a "bank account" for mitigation credits. Those agencies, local governments, individuals and other entities with toxics within their control and on their land would have the ability to remove them, at their own cost or with grants, and deposit mitigation "credits" into their account. If, as in the Port's case, the agency had a future project to which they could apply those credits, then they could do so. Timing would no longer be an issue. If the agency didn't have any future project to which they could apply the credits it could sell those to other agencies that needed them. In any case, the toxics would be removed sooner and be valued in a way that makes removal much more financially and ecologically feasible.

Puget Sound Partnership, with its state-wide presence and mandate, is the perfect agency to facilitate a market in mitigation credits. The credits could be valued in a number of ways. One method could be by standardizing the value of shading, surface area and toxicity of the various types of pollutants in our waters. Another method could be the dollar value of the cost of removal. Like the New York Stock Exchange or the Chicago Commodities Exchange, the PSP could take a percentage of each transaction as compensation for managing the market.

These are ideas that need to be discussed further to find a viable method of operation. Our objective here is to present the idea and start the conversation. We believe this concept would go a long way toward making our waters healthier much faster than any current procedures and allows for a wide range of participation. Virtually any scale of project, from removing creosote logs that drift onto the

beach to removing a toxic lumber mill could qualify. Cleaning up the sound could even be a fundraiser for groups that have the will and ability to clean up public shorelines. This could be the vehicle that implements the worthy goals of the Puget Sound Partnership.

Please feel free to contact us if you wish to discuss this subject further, and thank you for considering our proposal.

From: **Daniel Sloan**

Comment: To Whom It May Concern:

I applaud Governor Chris Gregoire's goal of a clean and healthy Puget Sound by 2020. The partnership's newly released Draft Action Agenda gave me an opportunity to compare it with a 1986 Puget Sound Water Quality Authority document available through the Electronic Hallway at the UW's Daniel J. Evans School of Public Affairs. Constructively speaking, the Puget Sound Partnership's Draft Action Agenda is a TO-DO list. It disappoints me for the following reasons:

** I was unable to find a single Revised Code of the State of Washington reference or recommendation. These omissions convey the impression that we are unclear on obvious, legislative imperatives.

** To succeed, the Action Agenda must clearly identify accountability and benchmark deadlines to guide us toward 2020 goals. The Agenda needs specifically identified, adequate, sustained funding it does not have.

** The agenda fails to mention of the distinct possibility of a Puget Sound ecosystem collapse. Island biogeography and other environmental realities submitted to the Partnership for consideration earlier this year are absent. The plan reads as if the Partnership ignored public input.

** Although there are 81 instances of the word science, the plan does not contain a single reference. Without data, analysis, and credible peer-reviewed citations the case for the Action Agenda rings hollow. Abrupt ecosystem collapses, whether one recalls the 1970 Black Sea fisheries or Palau's 1998 massive coral-bleaching event, are historical facts that hint at Puget Sound's probable 2010 to 2015 future. Ecosystem collapses literally happen overnight. I have personally seen the devastation of irreversible, overnight, environmental destruction in Africa, Australia, Brazil, Mexico, Costa Rica, Palau, the Solomon Islands, the Canadian wilderness, and the United States. I was going to college in Cleveland, Ohio when the polluted Cuyahoga River ignited in 1969. Some of the measures outlined in the Draft Action Agenda are good, necessary first steps. The following is a short list of the ideas contained in the action plan that please me.

*** Requiring low-impact development to reduce storm waters' non-point sourc pollution is legislation that must be enacted in 2009.

*** Oil spill prevention makes sense. Please continue to emphasize this issue. By the Partnership's own estimate, 52 million pounds of toxic chemicals - nearly 150,000 pounds per day - inundate Puget Sound with contaminated runoff.

o If we follow the proposed Draft Agenda's timetable, by 2020 the Puget Sound will have suffered six consecutive Exxon Valdez oil spills. Hood Canal has proven that it is unlikely Puget Sound can

survive continuous insult. We are almost out of time.

*** Prohibiting new bulkheads near feeder bluffs, adequately funding local governments to develop and carry out shoreline master programs, cleaning up toxic waste sites, and enforcing existing laws are sensible solutions.

*** The Agenda's call for extensive public education is right on target. It certainly took me a long time to come around to understanding the impact of my own actions and changing them accordingly at least within the boundaries of our culture.

In conclusion, I encourage the Partnership to raise the stakes of the Draft Action Agenda. Please accelerate the Partnership's timetable. Specify accountability and the sustained funding required to succeed. Please do what you can to raise the bar and probability for success.

From: **Tom Slocum**

Comment: I would like to submit the following public comment on PSP's Draft Action Agenda. I base my comment on my several years of experience directing a natural resource conservation engineering services program for the San Juan, Skagit, Whatcom and Whidbey Island conservation districts, as well as serving on the Salmon Recovery Funding Board's technical review panel.

Of the many worthy action items that are included in the Draft Action Agenda, I think that PSP should devote more attention to fleshing out Item D.4, coordinating and reforming existing laws and regulations to enable an integrated, ecosystem approach to planning. Specifically, the Action Agenda neglects to mention the need to reform Washington's diking district law, RCW Title 85. In rural areas of Puget Sound, the operation and maintenance of dike and drainage district infrastructure has a huge impact on ecosystem functions and values, one that I sense policy makers in Seattle and Olympia currently do not adequately recognize.

For the past decade I have worked with dike and drainage districts in the North Sound, trying to help them improve water quality, fish habitat, and agricultural drainage conditions within their jurisdictions. In general, I have found that districts primarily view their roles as limited solely to improving drainage and preventing flooding within the boundaries of their jurisdictions, and view attempts to address water quality protection and habitat restoration at a coordinated, watershed-wide scale with resistance and mistrust.

Governance of the districts by elected local citizens is admirable, but the exclusive focus on local agricultural needs that this engenders definitely hinders an ecosystem perspective to restoring Puget Sound. I believe that one of PSP's top near-term action priorities should be to work with the legislature to amend RCW Title 85 to include restoring Puget Sound as one of the primary functions of local diking and drainage districts. Please contact me at email tslocum@skagitcd.org if you would like further input on this issue. Thank you for this opportunity to comment on PSP's Draft Action Agenda.

From: **Brian Smart**

Comment: Dear Puget Sound Partnership,

Thank you for tackling the enormous challenge of saving Puget Sound head on. We appreciate your boldness and your efforts to engage the broader community, to listen to us and to base your decisions on science.

Surfrider Foundation is committed to supporting your efforts, primarily by encouraging people to get out in the watershed and into the Sound, to enjoy it, to appreciate it and to take action to protect and restore it. Through projects like Rise Above Plastics, beach clean ups and ocean friendly gardens, we will do our best to promote Sound stewardship practices.

In order to make sure that we reach our goal of a healthy Puget Sound by 2020, we ask that you strengthen the Action Agenda by incorporating the following recommendations:

- Be stronger on water quality measures by offering a comprehensive and robust program to prevent all sources of stormwater pollution and strengthening the list of actions for toxic pollution prevention.

- Develop different indicators for human well-being to include more opportunity for quality water-based recreation through increased shoreline access, clean beaches, and clean water.

- Be stronger on accountability by incorporating clear benchmarks to get us to a healthy Puget Sound by 2020.

- Create more opportunities and stronger protection programs to improve the public's interaction with the shoreline and achieve enough water quality improvement and habitat restoration to inspire the public to go to the water's edge more frequently.

- Ensure that there is enough funding for Puget Sound to achieve the goals laid out in this ambitious agenda.

Thank you for your hard work to develop a draft Action Agenda to restore, protect and recover Puget Sound to health by 2020.

From: **Diana Smith**

Comment: Dear Puget Sound Partnership,

Thank you for your commitment to developing an Action Agenda for a healthy Puget Sound. From struggling orcas to toxic chemicals in our water, the Sound needs quick and decisive action today. I want to make sure we pass a thriving Puget Sound on to future generations.

I urge the Partnership to incorporate accountability, benchmarks of success, and ample funding into this Agenda.

The draft Action Agenda includes many of the essential elements that need to be accomplished, but in addition, the final Action Agenda must also:

-Amend the Cruise Ship MOU to ban all cruise ship discharges in Puget Sound;

-Prioritize the protection and restoration of the State's forage fish spawning beds;

-Complete the Management Plan for the Cherry Point Aquatic Reserve;

-Identify adequate and sustained funding for Plan implementation;

-Update the guidance for open water dredge disposal of PCBs;

-Expand the indicator species to include forage fish abundance and harbor seal toxics loading; and

-Accelerate the restoration of the Elwha River.

Thank you for your hard work to develop a draft Action Agenda to restore, protect and recover Puget Sound to health by 2020.

On behalf of everything from eelgrass to orcas.

From: **Linda Kay Smith**

Comment: Thank you for all the effort in creating the PSP Draft Action Agenda. The current Draft Action Area Priorities is definitely more readable with the addition of the common column subtitles across the action areas.

The following 5 additions are requested to more adequately cover East Jefferson County in the Hood Canal Action Area chart titled "Draft Action Area Priorities" (page 71 of the Draft Action Agenda - 2). They are additions to the first column titled "Ecosystem benefits provided by action area" and are shown under the appropriate sub titles for the column. Ecosystem benefits provided by action area:

- Marine/estuary: Mix of fresh and marine waters helps Puget Sound from becoming stagnant Food and Timber:

- Agricultural production with an extended growing season, focused on small scale sustainable agriculture Community and Economy:

- Rural communities - Marine trades and marine vessel passage

- Port Townsend ferry (WA State highway 20) provides transportation linkage for North Olympic Peninsula. Note: Agriculture and marine trades are long established segments of Jefferson County's economy. Both face challenges with the goal to clean up Puget Sound.

From: **M Smith**

Comment: Sorry

But I can't afford it on retirement. At my waterfront cabin, the bulkhead bid was $40K+ and the neighbor spent $30k+ on his septic upgrading. I am retired and unemployed. It's fine and dandy for you environmentalists to tell us what to do but unfortunately, many of us flat out can not afford it.

I am terrified that some of the septic, drainage, and bulkhead ideas floated by you people will cause me to lose my house. Besides the money, there are also issues of who to trust amongst the contractors for critical jobs as these. It ain't broken so don't make us spend OUR money for YOUR

utopian dream. I've seen enough of contractors and the county approval/inspection process to be scared shitless that something will go wrong and/or be denied by the county even if I did not have to pay for it.

The one thing I will agree on is that neighbors should not be allowed to drain downspouts onto their neighbor's land.

From: **Mike Smith**

Comment: Dear Puget Sound Partnership,

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I urge the Partnership to incorporate accountability, benchmarks of success, and ample funding into this Agenda.

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-Identify adequate and sustained funding for Plan implementation;

-Update the guidance for open water dredge disposal of PCBs;

-Expand the indicator species to include forage fish abundance and harbor seal toxics loading; and

-Accelerate the restoration of the Elwha River.

Thank you for your hard work to develop a draft Action Agenda to restore, protect and recover Puget Sound to health by 2020.

On behalf of everything from eelgrass to orcas.

From: **Seth Snapp**

Comment: Dear Puget Sound Partnership,

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-Identify adequate and sustained funding for Plan implementation;

-Update the guidance for open water dredge disposal of PCBs;

-Expand the indicator species to include forage fish abundance and harbor seal toxics loading; and

-Accelerate the restoration of the Elwha River.

Thank you for your hard work to develop a draft Action Agenda to restore, protect and recover Puget Sound to health by 2020.

On behalf of everything from eelgrass to orcas.

From: **Jeanne Snell**

Comment: Dear Puget Sound Partnership,

The Partnership staff, the Leadership Council, Ecosystem Coordinating Board, Science Panel and stakeholders throughout the Sound deserve praise for the monumental effort involved in producing the draft Action Agenda. The next step is to finalize a plan that is accountable, transparent, effective and have dedicated new funding sources to the recovery of Puget Sound by 2020.

The Partnership must create a real 2020 Action Agenda, not just a 2-year plan that clearly identifies the specific actions that are needed over the next 12 years and the HOW and WHO and BY WHEN each action must be completed. All the actions need to be tied together into a comprehensive whole through measurable benchmarks that must be accomplished in order to achieve recovery by 2020.

We cannot afford to lose the health of Puget Sound.

Thank you for this opportunity to strengthen a strategy to save Puget Sound.

From: **Elly Snow**

Comment: Please revise the section regarding car washing as shown below. We ask that you include the option for charities contemplating parking lot car washes to do their fundraising in cooperation with a commercial car wash or car wash association. Commercial car washes and car wash associations provide alternatives to nonprofits for raising funds without polluting our waterways. Commercial car washes regularly offer their properties for use by nonprofits to raise money, and the Puget Sound Car

Wash Association offers our Car Wash Fundraiser. We issue tickets to nonprofits good at washes around the Sound, which they sell to fund their team uniforms, field trips, etc. Please also include that fleet washing should not be done anywhere but on approved wash systems, since they carry a significant amount of the effluent to the storm drains. Car Washing What products (soaps, waxes, cleaners) you use wash off into Puget Sound Use commercial car washes Wash on pervious surfaces like a lawn Use car wash kits for charity car washes or offer them in cooperation with a commercial car wash or car wash association Approved wash systems only for fleet washing If you have any questions please call me. Thank you.

From: **Nancy Snow**

Comment: Dear Puget Sound Partnership,

I am writing to urge you to improve your action agenda's recommendations on pollution prevention. I want a healthy Puget Sound to be part of the legacy we leave our children.

Many Washington manufacturers continue to use harmful chemicals without any plans to switch to chemicals that are safer for Puget Sound. To protect public health and the environment, Washington's industry must begin phasing out of the worst toxic chemicals and developing plans to switch to safer alternatives.

Please include recommendations to help move Washington's businesses toward safer alternatives and away from chemicals known to be harmful to Puget Sound. These proposals should include:

Increasing the availability of technical assistance to help businesses reduce chemical use.

Developing a state program to focus on researching safer chemicals and materials.

Requiring better industry reporting to Ecology of the chemicals currently being used.

From: **Nancy Snow**

Comment: Dear Puget Sound Partnership,

The Partnership staff, the Leadership Council, Ecosystem Coordinating Board, Science Panel and stakeholders throughout the Sound deserve praise for the monumental effort involved in producing the draft Action Agenda. The next step is to finalize a plan that is accountable, transparent and effective, and to dedicate new funding sources to the recovery of Puget Sound by 2020.

The Partnership must create a real 2020 Action Agenda, not just a two-year plan, that clearly identifies the specific actions that are needed over the next 12 years and the HOW and WHO and BY WHEN each action must be completed. All the actions need to be tied together into a comprehensive whole through measurable benchmarks that must be accomplished in order to achieve recovery by 2020.

Thank you for this opportunity to strengthen a strategy to save Puget Sound.

From: **Nancy Sosnove**

Comment: Dear Puget Sound Partnership,

Thank you for your hard work to develop a draft Action Agenda to restore, protect and recover Puget Sound to health by 2020. It could not come at a more pressing time, especially for the Sound's iconic and endangered orca whale. Just this month, researchers reported seven orcas "10% of the Puget Sound population" are missing and believed to be dead. Some experts say dwindling populations of endangered Chinook salmon are at least partly to blame. Is this a sign that our ecosystem is on the verge of collapsing?

The urgency of restoring the Sound to health is at a tipping point and missing orcas are the Sound's "canaries in the coal mine," telling us we are running out of time. But there is hope for the orca, as there was hope for the bald eagle, the California Condor and others on the verge of extinction. The Puget Sound Partnership's Action Agenda is a golden opportunity to do what has not been done for over 20 years- develop and implement a recovery plan that is accountable, effective, transparent and decisive with sustained funding to restore this national treasure to health by 2020.

The draft Action Agenda includes many of the essential elements that need to be done:

-Require low-impact development to reduce stormwater pollution;

-Prohibit new bulkheads near feeder bluffs and forage fish spawning beaches;

-Fund local governments to develop and carry out shoreline master programs;

-Fund enforcement staff at state agencies and local governments;

-Implement specific, aggressive cleanup plans for polluted waters, including TMDLs;

-Fully fund a permanent year-round rescue tug at Neah Bay for oil spill prevention;

-Acquire critical intact parcels for habitat protection and conservation;

-Set strong requirements for water quantity, such as setting in-stream flow for all major rivers.

BUT, more than a list of Soundwide and Action Area-specific actions, the Partnership must create a real 2020 Action Agenda, not just a 2-year plan, that clearly identifies the specific actions that are needed over the next 12 years and the HOW and WHO and BY WHEN each action must be completed. All the actions need to be tied together into a comprehensive plan with measurable benchmarks and timelines in order to achieve recovery by 2020. The final Action Agenda must:

-Clearly identify timelines and responsibilities;

-Identify adequate and sustained funding for the long haul;

-Be a visionary and long term plan;

-Be based on science;

-Offer a comprehensive and robust program to prevent all sources of stormwater pollution, not just municipal stormwater;

-Strengthen the list of actions for toxic pollution prevention;

-Set meaningful standards for habitat protection;

-Balance regulatory change with land acquisition to accomplish long term recovery goals;

-Expand the indicator species to include more than just salmon, i.e. forage fish, harbor seals, etc.

The Partnership staff, the Leadership Council, Ecosystem Coordinating Board, Science Panel and stakeholders throughout the Sound deserve praise for the monumental effort involved in producing the draft Action Agenda. The next step is secure much needed funding. The 2009 legislature must adopt new funding sources dedicated to the recovery of Puget Sound by 2020.

For Puget Sound!

From: **Eve Staatz**

Comment: Dear Puget Sound Partnership,

The Partnership staff, the Leadership Council, Ecosystem Coordinating Board, Science Panel and stakeholders throughout the Sound deserve praise for the monumental effort involved in producing the draft Action Agenda. The next step is to finalize a plan that is accountable, transparent, effective and have dedicated new funding sources to the recovery of Puget Sound by 2020.

The Partnership must create a real 2020 Action Agenda, not just a 2-year plan that clearly identifies the specific actions that are needed over the next 12 years and the HOW and WHO and BY WHEN each action must be completed. All the actions need to be tied together into a comprehensive whole through measurable benchmarks that must be accomplished in order to achieve recovery by 2020.

Thank you for this opportunity to strengthen a strategy to save Puget Sound.

From: **Robert and Gail Stagman**

Comment: Dear Puget Sound Partnership,

Thank you for your commitment to developing an Action Agenda for a healthy Puget Sound. From struggling orcas to toxic chemicals in our water, the Sound needs quick and decisive action today. I want to make sure we pass a thriving Puget Sound on to future generations.

I urge the Partnership to incorporate accountability, benchmarks of success, and ample funding into this Agenda.

The draft Action Agenda includes many of the essential elements that need to be accomplished, but in addition, the final Action Agenda must also:

-Amend the Cruise Ship MOU to ban all cruise ship discharges in Puget Sound;

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-Complete the Management Plan for the Cherry Point Aquatic Reserve;

-Identify adequate and sustained funding for Plan implementation;

-Update the guidance for open water dredge disposal of PCBs;

-Expand the indicator species to include forage fish abundance and harbor seal toxics loading; and

-Accelerate the restoration of the Elwha River.

Thank you for your hard work to develop a draft Action Agenda to restore, protect and recover Puget Sound to health by 2020.

On behalf of everything from eelgrass to orcas.

From: **Joan Stanigar**

Comment: Dear Puget Sound Partnership,

I am writing to urge you to improve your action agenda's recommendations on pollution prevention.

It is past time to address root causes of human and animal illness, natural habitat destruction, and economic burdens caused by choices in how we produce nearly everything we use as humans. Chemical choices are life choices. If we legislate to improve the quality of production through safe and responsible means, by cleaning up toxins and curtailing their use and production in the first place, our economy will improve. Businesses will be forced to explore new technologies, our food supply, water and air will be better for it, and our wildlife will thrive again. Polluters need to pay; it's the only way to change how business is done.

It is irresponsible to ignore the death of Puget Sound and inhumane not to try to change its course for good. If we wait too long, this opportunity won't return.

Please take whatever actions necessary to clean up Puget Sound and save the Orcas that are our bellwether and our regional symbol. If you act on this agenda, you'll be acting for the rest of us as well and not only commercial interests which by their nature do not have the greater good in mind.

From: **Elizabeth Stanton**

Comment: Dear Puget Sound Partnership,

The Partnership staff, the Leadership Council, Ecosystem Coordinating Board, Science Panel and stakeholders throughout the Sound deserve praise for the monumental effort involved in producing the draft Action Agenda. The next step is to finalize a plan that is accountable, transparent, effective and have dedicated new funding sources to the recovery of Puget Sound by 2020.

The Partnership must create a real 2020 Action Agenda, not just a 2-year plan that clearly identifies the specific actions that are needed over the next 12 years and the HOW and WHO and BY WHEN each action must be completed. All the actions need to be tied together into a comprehensive whole

through measurable benchmarks that must be accomplished in order to achieve recovery by 2020.

Thank you for this opportunity to strengthen a strategy to save Puget Sound.

From: **Judith Starbuck**

Comment: Dear Puget Sound Partnership,

I am writing to urge you to improve your action agenda's recommendations on pollution prevention.

From: **Joseph Staten**

Comment: Dear Puget Sound Partnership,

The Partnership staff, the Leadership Council, Ecosystem Coordinating Board, Science Panel and stakeholders throughout the Sound deserve praise for the monumental effort involved in producing the draft Action Agenda. The next step is to finalize a plan that is accountable, transparent, effective and have dedicated new funding sources to the recovery of Puget Sound by 2020.

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Thank you for this opportunity to strengthen a strategy to save Puget Sound.

From: **Chris Stay**

Comment: Dear Puget Sound Partnership,

I am writing to urge you to improve your action agenda's recommendations on pollution prevention.

The current draft of the action plan does not include provisions that will help move Washington's businesses toward safer alternatives and away from chemicals known to be harmful. These proposals should include increasing the availability of technical assistance to help businesses reduce chemical use, developing a state program to focus on researching safer chemicals and materials, and requiring better industry reporting of the chemicals currently being used.

Thank you

From: **Daniel Stearns**

Comment: Dear Leadership Council,

Thank you for the opportunity to comment on the Puget Sound Partnership Draft Action Agenda. I

appreciate the tremendous amount of work that has gone into developing it and I support the strong list of measures that, if implemented, will go a long way toward recovering Puget Sound by 2020.

The draft plan includes a few omissions. The final plan should include Outstanding Resource Water (ORW) designation under the Clean Water Act as a tool to help protect rivers and other aquatic habitat. While I strongly support the inclusion of Wild and Scenic designation as a similar tool, in some cases ORW designation will likely prove to be a better, more immediate way for the state to ensure the protection of high quality rivers and other waters. Therefore, I urge the Partnership to include support for the Outstanding Resource Water designation as one of its "Near Term Actions." ORW designations permanently protect high quality waters that are ecologically significant, provide cold water refuges for fish, and/or support important recreational values. Many rivers in the Puget Sound region are eligible for ORW designation.

I would also like to encourage you to include funds to move up the removal of the two dams on the Elwha from 2012 to 2010. Removal of the

Elwha dams is one of the best chances for salmon and steelhead recovery in the region as it will open up over 70 miles of prime spawning habitat. Removing these dams has also been as a key action to recover our Puget Sound's orca population, which is malnourished thanks to a lack of chinook salmon.

Especially during difficult financial times, finding opportunities for

economic benefit and job creation is important. Removing the Elwha dams provides a tremendous opportunity for creating "green jobs"

and numerous other economic benefits.

Thank you for taking my comments into consideration.

From: **Liz Steenbeeke**

Comment: After reading the article in yesterday's paper, I had a thought.

Funding seems to be the challenge in cleaning up Puget Sound. My thought is that in order to bring this crisis to people's attention is to advertise it in a mailer, and ask for donations. National Wildlife Federation, animal societies, cancer research all do it, why not you? I am not sure what the cost of this kind of mailing would be, but I can only imagine that the returns on your effort would be worthwhile. Personally, I would be willing to donate 10$ a month for as long as it takes even though I'd put Starbucks out of business for awhile by not getting my lattes! I'm sure there are others out there who would do the same.

Are you already doing something like this? If not, I'll come in and help stuff the envelopes for mailing! I just feel like people take the beauty of the Puget Sound for granted and are not really thinking that it could go away; hearing about the whales did it for me.

Please let me know what you think.

From: **Linda Stein**

Comment: Dear Puget Sound Partnership,

I am writing to urge you to improve your action agenda's recommendations on pollution prevention.

From: **Terry Stella**

Comment: Dear Puget Sound Partnership,

The Partnership staff, the Leadership Council, Ecosystem Coordinating Board, Science Panel and stakeholders throughout the Sound deserve praise for the monumental effort involved in producing the draft Action Agenda. The next step is to finalize a plan that is accountable, transparent, effective and have dedicated new funding sources to the recovery of Puget Sound by 2020.

The Partnership must create a real 2020 Action Agenda, not just a 2-year plan that clearly identifies the specific actions that are needed over the next 12 years and the HOW and WHO and BY WHEN each action must be completed. All the actions need to be tied together into a comprehensive whole through measurable benchmarks that must be accomplished in order to achieve recovery by 2020.

Thank you for this opportunity to strengthen a strategy to save Puget Sound.

From: **Daphne Stephens**

Comment: Dear Puget Sound Partnership,

I am writing to urge you to improve your action agenda's recommendations on pollution prevention. I want a healthy Puget Sound to be part of the legacy we leave our children.

Many Washington manufacturers continue to use harmful chemicals without any plans to switch to chemicals that are safer for Puget Sound. To protect public health and the environment, Washington's industry must begin phasing out of the worst toxic chemicals and developing plans to switch to safer alternatives.

Please include recommendations to help move Washington's businesses toward safer alternatives and away from chemicals known to be harmful to Puget Sound. These proposals should include:

Increasing the availability of technical assistance to help businesses reduce chemical use.

Developing a state program to focus on researching safer chemicals and materials.

Requiring better industry reporting to Ecology of the chemicals currently being used.

From: **Roy Stephenson**

Comment: Studded tires driven on dry roads chip small or microscopic particles of asphault from our roads. You can observe ruts an inch or better deep miles long several places along I-5. This amounts to several tons of asphault loosened and alowed to get into the environment annualy. This then washes into drains and into rivers and the Sound. Additionally, the ruts and depresions left fill with rain water and

cause hydroplaining, a dangerous driving condition considering how wet our roadways are. The small amount of safety gained driving with studded tires in ice and snow is over shadowed by damage to roads and the considerable amount of asphault polution it causes to out streams, rovers and Puget sound(our roads are wet far more than they are icey).

From: **Wilhelm Steve**

Comment: Dear Puget Sound Partnership,

The Partnership staff, the Leadership Council, Ecosystem Coordinating Board, Science Panel and stakeholders throughout the Sound deserve praise for the monumental effort involved in producing the draft Action Agenda. The next step is to finalize a plan that is accountable, transparent, effective and have dedicated new funding sources to the recovery of Puget Sound by 2020.

The Partnership must create a real 2020 Action Agenda, not just a 2-year plan that clearly identifies the specific actions that are needed over the next 12 years and the HOW and WHO and BY WHEN each action must be completed. All the actions need to be tied together into a comprehensive whole through measurable benchmarks that must be accomplished in order to achieve recovery by 2020.

Thank you for this opportunity to strengthen a strategy to save Puget Sound.

From: **Douglas Stevenson**

Comment: Dear Puget Sound Partnership,

I am writing to urge you to improve your action agenda's recommendations on pollution prevention.

From: **Anica Stieve**

Comment: After reviewing the Action Agenda I am concerned about how the agenda will be funded; an important detail which is lacking throughout. In order to implement a program such as this and ensure a lasting impact details and sources of funding must be outlined along with the plans needed to obtain them. The lists of reforms are numerous and necessary, but without substantial funding and a consensus among citizens and policy-makers about its sources, the reforms will not succeed. It is disappointing that the plan only covers expense issues over the next two-three years, while ignoring the long-term. Obviously, funding must be prioritized according to the most salient issues. The plan focuses on pollutants from stromwater and other sources as a major problem facing Puget sound. More emphasis should be placed on economically feasible conservation strategies, such as metering water, taxes and fees for certain usage levels, etc. Conservation strategies are also accessible to indi viduals in the community and can be advocated at the grass-roots level. The plan advocates strongly for Reuse of water which is an expensive and somewhat impractical solution. I also feel much effort must be devoted to amending water law and including exempt wells. Good stewardship by property owners, farmers, and businesses must be rewarded in order to encourage the reform and conservation needed in Puget sound. The action agenda mentions these ideas vaguely but does not lay out a specific plan to implement policies or their potential details. I find it also odd that considering the goal

is to restore the sound by 2020, a mere twelve years away, the plan was drafted without projected timelines/deadlines and budget summaries. Since the health of the sound is a very time sensitive issue, which cannot be postponed, I think the plan should include these crucial elements. I am also concerned with how many times the plan included creating a "new process" or "study" on certain issues. Processes and studies take time and money to plan, execute and analyze. I worry that with all the new plans/processes the agenda outlines, people will get discouraged, funds will be sparse, and conservation efforts will dwindle. One possible way to fund some of the plan and reduce water pollution would be to fine cars that are contributing to the problem. Similar to the idea of the emissions test cars have to get when they renew registration, cars should have to have a leak test to check for any toxins. If a person's car does not meet standards than their registration wouldn't be renewed. Fines for noncompliance with this standard could pay for a portion of other agenda reforms. A plan such as this would be relatively inexpensive and easy to implement. I commend your efforts in assembling this action agenda. Many of its proposals are viable and necessary for conservation in the near future. However, I hope the pressing issues of funding, timelines and accountability will be determined and established soon so that we can succeed in achieving the goal of a healthy Puget sound by 2020.

From: **Mary Stimson**

Comment: I support all efforts to improve the health of Puget Sound. Thank you for supporting additional wilderness in the Alpine Lakes area and Wild & Scenic River designation for the Pratt River. There are many other rivers, streams, and forested areas in the Puget Sound watershed that need protection. They provide critical habitat for salmon and other species. They also provide a clean water source for the sound. Please support protection for these other rivers and forests.

From: **Frank Stowell**

Comment: Dear Puget Sound Partnership,

I first want to thank all of you in the organization for the heroic work you have done in such a short time to develop this Action Agenda for restoring Puget Sound. Having read the full action agenda document intact (me, not the document for it is very long) and having attended several of the meetings over the past 6 months, including last week's Leadership Council meeting, I appreciate how far this effort has come, and how much has been accomplished.

But, as many have noted, more than being a list of sound wide actions and actions for each Action Area, the Partnership still must create a real 2020 Action Agenda, not just a 2-year plan that clearly identifies the specific actions that are needed over the next 12 years and the HOW and WHO and BY WHEN each action must be completed. All the actions need to be tied together into a comprehensive whole through measurable benchmarks that must be accomplished in order to achieve recovery by 2020. The final Action Agenda must:

-Clearly identify accountability and benchmarks to get us to a healthy Puget Sound by 2020;

-Identify adequate and sustained funding for the long haul;

-Be a visionary and long term plan;

-Be based on science;

-Offer a comprehensive and robust program to prevent all sources of storm water pollution, not just municipal storm water;

-Strengthen the list of actions for toxic pollution prevention;

-Set meaningful standards for habitat protection;

-Balance regulatory change with land acquisition to accomplish long term recovery goals;

-Expand the indicator species to include than just salmon, i.e. forage fish, harbor seals, etc.

I would also hope that in your upcoming discussions with the Legislature, that funds be made available for local communities to accelerate their timetables to complete their Shoreline Master Plans, which I think will create very positive and immediate local contributions to the Partnership's overall Action Agenda goals for Puget Sound.

And I would also encourage the Partnership to develop a more robust outreach and education program to local communities and grass roots organizations to further these goals. There is a need to make these issues more vivid, more visually understandable so the public can have a clearer and more compelling image of the damage being inflicted on this magnificent resource we all share but are rapidly losing. Since the Partnership does not have regulatory authority, it will be essential to arouse and harness the creative energies of committed citizens in their local communities to help push their political representatives to make the right decisions. This past election has illustrated how much we hunger as a nation to become involved and work together under fair, clear and accountable leadership-it can happen here as well. This effort to save the Sound should be our Northwest version of the Marshall Plan- we stand ready to help.

From: **Victoria Stratton**

Comment: Dear Puget Sound Partnership,

Thank you for your hard work to develop a draft Action Agenda to restore, protect and recover Puget Sound to health by 2020. It could not come at a more pressing time, especially for the Sound's iconic and endangered orca whale. Just this month, researchers reported seven orcas "10% of the Puget Sound population" are missing and believed to be dead. Some experts say dwindling populations of endangered Chinook salmon are at least partly to blame. Is this a sign that our ecosystem is on the verge of collapsing?

The urgency of restoring the Sound to health is at a tipping point and missing orcas are the Sound's "canaries in the coal mine," telling us we are running out of time. But there is hope for the orca, as there was hope for the bald eagle, the California Condor and others on the verge of extinction. The Puget Sound Partnership's Action Agenda is a golden opportunity to do what has not been done for over 20 years- develop and implement a recovery plan that is accountable, effective, transparent and decisive with sustained funding to restore this national treasure to health by 2020.

The draft Action Agenda includes many of the essential elements that need to be done:

-Require low-impact development to reduce stormwater pollution;

-Prohibit new bulkheads near feeder bluffs and forage fish spawning beaches;

-Fund local governments to develop and carry out shoreline master programs;

-Fund enforcement staff at state agencies and local governments;

-Implement specific, aggressive cleanup plans for polluted waters, including TMDLs;

-Fully fund a permanent year-round rescue tug at Neah Bay for oil spill prevention;

-Acquire critical intact parcels for habitat protection and conservation;

-Set strong requirements for water quantity, such as setting in-stream flow for all major rivers.

BUT, more than a list of Soundwide and Action Area-specific actions, the Partnership must create a real 2020 Action Agenda, not just a 2-year plan, that clearly identifies the specific actions that are needed over the next 12 years and the HOW and WHO and BY WHEN each action must be completed. All the actions need to be tied together into a comprehensive plan with measurable benchmarks and timelines in order to achieve recovery by 2020. The final Action Agenda must:

-Clearly identify timelines and responsibilities;

-Identify adequate and sustained funding for the long haul;

-Be a visionary and long term plan;

-Be based on science;

-Offer a comprehensive and robust program to prevent all sources of stormwater pollution, not just municipal stormwater;

-Strengthen the list of actions for toxic pollution prevention;

-Set meaningful standards for habitat protection;

-Balance regulatory change with land acquisition to accomplish long term recovery goals;

-Expand the indicator species to include more than just salmon, i.e. forage fish, harbor seals, etc.

The Partnership staff, the Leadership Council, Ecosystem Coordinating Board, Science Panel and stakeholders throughout the Sound deserve praise for the monumental effort involved in producing the draft Action Agenda. The next step is secure much needed funding. The 2009 legislature must adopt new funding sources dedicated to the recovery of Puget Sound by 2020.

For Puget Sound!

From: **Eycke Strickland**

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our sound, our community, our chance

Comment: Dear Puget Sound Partnership,

We live on the northern coast - Strait of Juan de Fuca - of the Olympic Peninsula. The Strait is considered to be part of the Puget Sound Clean Up area. I am writing to urge you to improve your action agenda's recommendations on pollution prevention.

From: **Cathy Strum**

Comment: Dear Puget Sound Partnership,

Thank you for your commitment to developing an Action Agenda for a healthy Puget Sound. From struggling orcas to toxic chemicals in our water, the Sound needs quick and decisive action today. I want to make sure we pass a thriving Puget Sound on to future generations.

I urge the Partnership to incorporate accountability, benchmarks of success, and ample funding into this Agenda.

The draft Action Agenda includes many of the essential elements that need to be accomplished, but in addition, the final Action Agenda must also:

-Amend the Cruise Ship MOU to ban all cruise ship discharges in Puget Sound;

-Prioritize the protection and restoration of the State's forage fish spawning beds;

-Complete the Management Plan for the Cherry Point Aquatic Reserve;

-Identify adequate and sustained funding for Plan implementation;

-Update the guidance for open water dredge disposal of PCBs;

-Expand the indicator species to include forage fish abundance and harbor seal toxics loading; and

-Accelerate the restoration of the Elwha River.

Thank you for your hard work to develop a draft Action Agenda to restore, protect and recover Puget Sound to health by 2020.

On behalf of everything from eelgrass to orcas.

From: **Don Stuart**

Comment: Thank you for providing an opportunity to comment on the Draft 2020 Action Agenda for Puget Sound. And thank you, also, for producing a fine product that does appear to face up to the real challenges that confront us.

My comments/suggestions pertain to the actions proposed for the active working, private farm and forestlands in the Puget Sound Basin. The crux of the Draft Agenda's proposals, in this regard, are found under Question 3 (actions), Priority A (protect intact processes), under A.4. But my comments

apply both there and more generally through the Draft:

1. Indicators and benchmarks: I am aware that I'm entering this process late, so my apologies for missing the groundwork discussions that probably led to identification of the performance measures of success chosen for the Partnership in the area of "human well-being." My concern is that the measures that pertain to working lands do not seem to go closely and quickly enough to the heart of the problems that confront these lands. The measures you have chosen are: "loss of natural land cover" and "increase of impervious surface."

These are excellent measures. But they also seem "slow" as indicators of success or failure. By the time we can see that many of the trees are already cut and that much of the ground is already covered with pavement, it will already be much too late to correct matters for a huge additional amount of farm and forest land that is not yet destroyed, but whose fate will, by then, have been long since sealed. And the immense contributions and opportunities they provide for a healthy Puget Sound will already be as good as gone. Could we find a measure that warns us sooner - one that works, not just for the lands that have been cleared or covered, but also for those lands that may not yet be destroyed, but that, without intervention, certainly will be converted and destroyed in the years that follow?

Two "earlier" measures suggest themselves:

1) Fragmentation of the working land base, and

2) The differential between the fair market value of our farm and forest lands and their "current use" value as working lands.

Both of these measures would be based on statistical information that is already available or easily assembled. Records of parcelization of land are readily available. And county assessor data on the market vs. current use value of lands is also readily available at the county level and is reported annually to the Department of Revenue.

The first of these will tell us that larger farm and forest properties have been subdivided into sizes that are no longer economic for farm or forest business use and, hence, that these lands are destined to be converted into more intensive, environmentally unfriendly uses which will, in due course, doubtless lead to the clearing and impervious surfaces we will later discover. The second helps us learn that, even if the land is currently still in working natural resource use (and, hopefully environmentally benign), and even if the land has not already been fragmented into uneconomic-sized parcels, it soon will be. It warns us that the market has already destined these lands for fragmentation and for a more intensive and environmentally damaging use. We will then know that such a use that will certainly follow at some point in the future unless there is some intervention that prevents that from happening (e.g. reduced density zoning or purchase of development rights).

This latter measure, in particular, is the ultimate early-indicator of success or failure at protecting agricultural and private forestlands from development. Once the market value of land owned by a farm or forest business has come to exceed its value as a natural resource business asset, the long-term fate of that land has essentially been sealed. When it next sells, we know that is will probably not sell to another farmer or forester. Yet, with this measure we learn about this in time to actually intervene and do something about it through improved land use laws, with programs for the purchase of development rights, with stronger programs for natural resource businesses, or with other measures

to remove that differential value and again make land affordable for farmers and foresters.

These two "early indicators" would be much more sensitive to what is happening on the ground than will a look, after the fact, at forest cover or impervious surfaces. The use of natural cover and impervious surfaces is, of course, also a critical measure that should obviously be employed as well.

2. Farm and forest lands as an opportunity: Perhaps I have missed it in my read of the Draft, or perhaps it is implicit. But it would certainly be welcome to see some clear mention of the "opportunity" that retaining private farm and forest lands in natural resource business production represents for the quality of Puget Sound - opportunity for both improving conditions as well as for preserving current conditions. This is indirectly suggested in the discussion of ecosystem markets that occurs later in the Draft.

Lands owned and managed by private farm and forest businesses are of necessity kept in larger parcels than is generally allowed by typical local zoning in the Puget Sound Basin. They contribute wildlife habitat, wildlife migration corridors, aquifer recharge, detention of floodwaters, and the filtration of surface and ground water. Those values are lost when these lands subdivide and develop. And, in most cases, it is entirely possible to greatly enhance and strengthen these services using conservation management practices that are entirely consistent with continuation of traditional agricultural production - in fact, in many cases, those practices can actually enhance traditional production and profitability. Those opportunities are also lost when the land develops or falls out of natural resource use.

The discussion under Question 3, A.4 of supporting long term production and stewardship on working farms and forests is excellent. But it seems like some mention is deserved of the special opportunities they provide.

One of the tools we have available, the use of working land conservation easements (purchase of development rights) provides immense leverage and can help support the ensuing conservation management of the land. Acquiring such easements:

a) Leverages substantial federal money available through the Federal Farmland Protection Program under the Farm Bill;

b) Is considerably cheaper that full fee acquisition - mentioned prominently in the Draft;

c) Involves little or no post-acquisition land management cost or ownership liability that can add considerably to the total public expense of protecting the land;

d) Assures continued tax contributions to the public purse - unlike outright acquisitions that remove lands from the tax rolls;

e) Assure the continuation of positive contributions to the local economy provided by the private farm or forest business on the property (contributions that typically include a high local economic impact multiplier);

f) Needed conservation management practices and actions can be incorporated into the easement and thereby effectively enforced - at a cost that may be minimal compared to the public cost of managing the land and engaging in conservation practices after the land is acquired outright; and,

g) Provide an opportunity to also, in the same transaction, acquire fuller environmental protections for those portions of a farm or forest property that are not currently in use for farming or forestry and are often environmentally sensitive and may be of particular public importance. Often these lands are of little value for farm or forest production, so their more complete protection will typically fit in nicely with both the farmers' and the public's needs.

It seems like some mention of these possibilities and opportunities should be included in this draft.

3. Role of agriculture & forest industries in ecosystem markets: Under Question 3, D4.2.3 and E.2.3 and E.2.16 there is some discussion of the possibilities of ecosystem services markets. This seems to me to be one of the more transformational of the possibilities applying to private farm and forestlands and one of our more significant opportunities. I would be good to see a bit more discussion of the specific possibilities this provides to:

a) Provide needed opportunities for society to mitigate for the inevitably increasing environmental damage we anticipate in the years to come from growth and development;

b) Provide this mitigation at a considerably lower cost and greater effectiveness than is currently possible;

c) Provide supplemental income for private farm and forest businesses that helps them remain in business and helps prevent their land from being sold and fragmented up for more intensive, environmentally harmful uses.

If these opportunities are to be fulfilled, however, it is important that BOTH the potential suppliers of ecosystem services and those who will buy them have a system that can address their needs. As I'm sure you know, these markets are complex. And there are significant (but manageable) barriers to their emergence. Perhaps it was by design that there is little discussion in the Draft of the details of ecosystem markets. But if we are to take advantage of the immense ecosystem market supply opportunities available from private farm and forest landowners, it will be critical that we engage those industries in an open and constructive discussion of their needs, concerns, and ideas for how we might structure the marketplace so it works for them.

It would be quite useful, therefore, to see this Agenda include some mention of engaging in discussions with agriculture and forestry on the design and structure of ecosystem markets. A beginning is currently being made through the study and anticipated pilot projects that were authorized by last Session's SB 6805 - the Washington Conservation Markets bill. It would be good to see the Puget Sound Partnership and the Agenda reinforce that effort, specifically recognize the contribution that can be made by working lands, and clearly acknowledge the need to fully engage the agriculture and forest industries in the design and operation of the anticipated marketplace.

4. Role of ecosystem markets in improving strategic targeting of conservation: Under Question 3 at the end of the first paragraph at the start of A.4, there is a very appropriate but brief mention of the challenges of being environmentally strategic with voluntary, incentive-based programs. But there is no mention of the role that price plays in making such programs considerably more strategic. This is one place where ecosystem services markets can play a helpful role.

In several years of dealing closely with agriculture and agricultural easements, I have yet to meet a farmer who, after a lifetime career of trying to make his farm the best, most successful and most sustainable farming operation possible, actually wants to see that farm developed. When they sell,

they sell to developers ONLY because the developer is, by a wide margin, the highest bidder. Given the chance to sell, instead, to another farmer, if the farmer could afford to pay the market price, there is, essentially, no farmer of my acquaintance who would not much prefer to do so.

Similarly, existing conservation incentives programs do not treat conservation as a marketplace and dramatically under-value the ecosystem services being provided by our farms. The funding they offer is always in short supply, so program managers are always forced to rely mostly on those public-spirited volunteers who are willing to take action on their own or with only minimal help with the costs. These programs are, by description and definition, "cost-share" programs. Of necessity, only a few people can participate. And by logical extension, that participation tends to sprinkle itself thinly and non-strategically across the landscape. With the formation of an actual ecosystem market, the price of ecosystem services will hopefully more closely approximate their value. It seems highly likely that farm and forest landowners will be much more motivated to participate. Environmental restoration and protection efforts will much more easily be able to target their efforts and spending at those locations or on those needs where the positive impact will be greatest.

I would, therefore, suggest that the existence of strong, appropriately-funded purchase of development rights programs, and the emergence of genuine ecosystem markets designed in a way that makes it possible for private farmer, ranchers, and foresters to easily participate, would essentially remove much of the difficulty with strategic targeting of conservation efforts that might have characterized past conservation incentives programs.

A new and properly funded PDR program would change this equation for land protection and would also make the targeting of restoration and new conservation management actions much more effective and strategic. Such a program will make it possible for those farmers who need to sell their farms to see those farms pass into the hands of other farmers, rather than to developers. And a strong conservation market would, of necessity, target spending in those locations where the greatest value can be achieved for the dollar spent. The two (purchasing development rights and conservation management practices) would work hand in hand to improve both the environment and the long term economic viability of the agriculture and forest businesses that we currently depend upon to keep our lands in open, undeveloped use.

Thank you for considering these comments and suggestions. I wish you the best of luck in pursuing the Partnership's laudable goals.

From: **Brian Sullivan**

Comment: Dear Puget Sound Partnership,

Thank you for your hard work to develop a draft Action Agenda to restore, protect and recover Puget Sound to health by 2020. When it comes to restoring the health of the Puget Sound, where and how we grow matters. Especially in light of the one million new residents the state expects to welcome by 2020. It's more crucial than ever to focus that growth inside our urban areas so that we can preserve our farm and forest land and protect our rural areas to restore critical habitats and watersheds of the Sound.

While I applaud your effort thus far, the Action Agenda can and must go farther. We need a twenty year plan, not a two year plan. All the actions need to be tied together into a comprehensive plan with

measurable benchmarks and timelines in order to achieve recovery by 2020.

As you finalize the final Action Agenda, please:

-Balance regulatory change with land acquisition to accomplish long term recovery goals;

-Take advantage of the region's recent vote to build 34 miles of new light rail - we must capitalize on this investment by requiring more intense development near these station areas that are pedestrian, bicycle and transit friendly;

-Identify adequate and sustained funding for the long haul;

-Clearly identify timelines and responsibilities;

-Be based on science;

-Set meaningful standards for habitat protection.

The Partnership staff, the Leadership Council, Ecosystem Coordinating Board, Science Panel and stakeholders throughout the Sound deserve praise for the monumental effort involved in producing the draft Action Agenda. The next step is secure much needed funding. The 2009 legislature must adopt new funding sources dedicated to the recovery of Puget Sound by 2020.

For Puget Sound!

From: **Aiko Sumidaa**

Comment: Dear Puget Sound Partnership,

I am writing to urge you to improve your action agenda's recommendations on pollution prevention.

From: **Dwight Sutton**

Comment: Dear Puget Sound Partnership,

Thank you for tackling the enormous challenge of saving Puget Sound head on. We appreciate your boldness and your efforts to engage the broader community, to listen to us and to base your decisions on science.

Surfrider Foundation is committed to supporting your efforts, primarily by encouraging people to get out in the watershed and into the Sound, to enjoy it, to appreciate it and to take action to protect and restore it. Through projects like Rise Above Plastics, beach clean ups and ocean friendly gardens, we will do our best to promote Sound stewardship practices.

In order to make sure that we reach our goal of a healthy Puget Sound by 2020, we ask that you strengthen the Action Agenda by incorporating the following recommendations:

- Be stronger on water quality measures by offering a comprehensive and robust program to prevent

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all sources of stormwater pollution and strengthening the list of actions for toxic pollution prevention.

- Develop different indicators for human well-being to include more opportunity for quality water-based recreation through increased shoreline access, clean beaches, and clean water.

- Be stronger on accountability by incorporating clear benchmarks to get us to a healthy Puget Sound by 2020.

- Create more opportunities and stronger protection programs to improve the public's interaction with the shoreline and achieve enough water quality improvement and habitat restoration to inspire the public to go to the water's edge more frequently.

- Ensure that there is enough funding for Puget Sound to achieve the goals laid out in this ambitious agenda.

Thank you for your hard work to develop a draft Action Agenda to restore, protect and recover Puget Sound to health by 2020.

Without vigorous and thoughtful action, we shall find that Puget Sound will no longer be a healthy element in our environment.

From: **Ed Sutton**

Comment: I am a Commissioner of the Eastsound Sewer and Water District. It is our position that the Growth Management Act works in opposition to the goals of the PSP insofar as the former restricts our ability to protect the groundwater aquifer under Eastsound and the waters of Puget Sound off our north shore from pollution by wastewater contamination because of UGA boundaries which limit the activity of utility districts. This is a very serious issue in the Islands and I would appreciate the opportunity to discuss this further with appropriate representatives of the PSP.

From: **Shannon Svensson**

Comment: I am writing to urge you to improve your action agenda's recommendations on pollution prevention.

From: **Linda Swan**

Comment: Dear Puget Sound Partnership,

Thank you for your commitment to developing an Action Agenda for a healthy Puget Sound. From struggling orcas to toxic chemicals in our water, the Sound needs quick and decisive action today. I want to make sure we pass a thriving Puget Sound on to future generations.

I urge the Partnership to incorporate accountability, benchmarks of success, and ample funding into this Agenda.

The draft Action Agenda includes many of the essential elements that need to be accomplished, but in

addition, the final Action Agenda must also:

-Amend the Cruise Ship MOU to ban all cruise ship discharges in Puget Sound;

-Prioritize the protection and restoration of the State's forage fish spawning beds;

-Complete the Management Plan for the Cherry Point Aquatic Reserve;

-Identify adequate and sustained funding for Plan implementation;

-Update the guidance for open water dredge disposal of PCBs;

-Expand the indicator species to include forage fish abundance and harbor seal toxics loading; and

-Accelerate the restoration of the Elwha River.

Thank you for your hard work to develop a draft Action Agenda to restore, protect and recover Puget Sound to health by 2020.

On behalf of everything from eelgrass to orcas.

From: **Jeanna Swanson**

Comment: Dear Puget Sound Partnership,

I am writing to urge you to improve your action agenda's recommendations on pollution prevention.

From: **Richard Sweezey**

Comment: Dear Puget Sound Partnership,

I am writing to urge you to improve your action agenda's recommendations on pollution prevention.

From: **Paul Swenson**

Comment: Dear Puget Sound Partnership,

The Partnership staff, the Leadership Council, Ecosystem Coordinating Board, Science Panel and stakeholders throughout the Sound deserve praise for the monumental effort involved in producing the draft Action Agenda. The next step is to finalize a plan that is accountable, transparent, effective and have dedicated new funding sources to the recovery of Puget Sound by 2020.

The Partnership must create a real 2020 Action Agenda, not just a 2-year plan that clearly identifies the specific actions that are needed over the next 12 years and the HOW and WHO and BY WHEN each action must be completed. All the actions need to be tied together into a comprehensive whole through measurable benchmarks that must be accomplished in order to achieve recovery by 2020.

Thank you for this opportunity to strengthen a strategy to save Puget Sound.

From: **Sonya Swingle**

Comment: Dear Puget Sound Partnership,

I am writing to urge you to improve your action agenda's recommendations on pollution prevention.

From: **Kathleen Syck**

Comment: Dear Puget Sound Partnership,

The Partnership staff, the Leadership Council, Ecosystem Coordinating Board, Science Panel and stakeholders throughout the Sound deserve praise for the monumental effort involved in producing the draft Action Agenda. The next step is to finalize a plan that is accountable, transparent, effective and have dedicated new funding sources to the recovery of Puget Sound by 2020.

The Partnership must create a real 2020 Action Agenda, not just a 2-year plan that clearly identifies the specific actions that are needed over the next 12 years and the HOW and WHO and BY WHEN each action must be completed. All the actions need to be tied together into a comprehensive whole through measurable benchmarks that must be accomplished in order to achieve recovery by 2020.

Thank you for this opportunity to strengthen a strategy to save Puget Sound.

From: **Mack Talcott**

Comment: Priority E of Question 3 focuses on a way to build and implement management system that will ensure continual improvement and maximize the positive impact of the Action Agenda. A good performance auditing system, stable funding, a prioritized science program, and broad communications effort are all key to this. New and innovative funding methods will be very important in ensuring the reliability of money for the Agenda. A long-term and continuous investment in the goals of the Agenda is needed. In-lieu-fee mitigation and water quality trading are mentioned, but no other specific implementations of a new funding plan are. The plan includes pilot programs to explore the feasibility of such programs. Also, "more attention is needed on methods to harness the power of market approaches to produce conservation outcomes." Evaluating new financial compensation methods for the environment's cost due to our land use should be a top priority of the Agenda. Today, landowners that develop/use their land for more ecologically harmful purposes are, for the most part, subsidized by those that don't. Monetary compensation for land of more ecological value would be an effective program that could withstand the test of time. Higher ecological value should amount to higher ec onomic value. Landowners should be penalized for their ecological impacts (for which they are now, to a certain extent), and landowners whose property has more ecological value should be compensated. This sort of new system could reduce the amount to which developed lands are subsidized by non-developed lands and raise money for impact fees. Economic solutions like this would inherently produce more of a positive outcome for the environment, as economic forces would aid in regulation. However, there is only a slight mention of ecosystem service markets in the draft, and it only mentions in-lieu-fee

mitigation and water quality. More programs need to be tested, even if they are over a small area, to find a permanent solution. The Agenda focuses on goal alignment across the whole Puget Sound. Local projects seeking grants need to be along the Agenda's main objectives. This optimizes the effectiveness of local efforts and coordinates regional activities so that we make a greater positive impact. It also improves on the decentralized and inefficient system we have in place now with local projects. However, there is a concern for funding of local projects that aren't aligned with the Agenda's goals. There could also be a concern for people who want to focus on a specific cause that isn't in the Agenda's top goals. Eliminating these resources could drive funding and other help away from the organization. Efforts in the Partnership may be focused, and spreading resources too thin is a problem with the system now in place, but the Agenda should give more incentive for these groups to associate with the Partnership. Overall, the management system implementation in the Agenda is very sound and is a huge step in the right direction. Accountability problems, adaptive management, scientific monitoring, and information management are all addressed, and the solutions mentioned will hopefully preserve the Sound's natural beauty for my children. Thanks for your hard work!

From: **Heath Ashli Taranowski**

Comment: Dear Leadership Council,

Thank you for the opportunity to comment on the Puget Sound Partnership Draft Action Agenda. I appreciate the tremendous amount of work that has gone into developing it and I support the strong list of measures that, if implemented, will go a long way toward recovering Puget Sound by 2020.

The draft plan includes a few omissions. The final plan should include Outstanding Resource Water (ORW) designation under the Clean Water Act as a tool to help protect rivers and other aquatic habitat. While I strongly support the inclusion of Wild and Scenic designation as a similar tool, in some cases ORW designation will likely prove to be a better, more immediate way for the state to ensure the protection of high quality rivers and other waters. Therefore, I urge the Partnership to include support for the Outstanding Resource Water designation as one of its "Near Term Actions." ORW designations permanently protect high quality waters that are ecologically significant, provide cold water refuges for fish, and/or support important recreational values. Many rivers in the Puget Sound region are eligible for ORW designation. I would also like to encourage you to include funds to move up the removal of the two dams on the Elwha from 2012 to 2010. Removal of the Elwha dams is one of the best chances for salmon and steelhead recovery in the region as it will open up over 70 miles of prime spawning habitat. Removing these dams has also been as a key action to recover our Puget Sound's orca population, which is malnourished thanks to a lack of chinook salmon.

Especially during difficult financial times, finding opportunities for economic benefit and job creation is important. Removing the Elwha dams provides a tremendous opportunity for creating "green jobs" and numerous other economic benefits.

Thank you for taking my comments into consideration.

From: **Phillip Taylor**

Comment: Dear Puget Sound Partnership,

Thank you for your hard work to develop a draft Action Agenda to restore, protect and recover Puget Sound to health by 2020. When it comes to restoring the health of the Puget Sound, where and how we grow matters. Especially in light of the one million new residents the state expects to welcome by 2020. It's more crucial than ever to focus that growth inside our urban areas so that we can preserve our farm and forest land and protect our rural areas to restore critical habitats and watersheds of the Sound.

While I applaud your effort thus far, the Action Agenda can and must go farther. We need a twenty year plan, not a two year plan. All the actions need to be tied together into a comprehensive plan with measurable benchmarks and timelines in order to achieve recovery by 2020.

As you finalize the final Action Agenda, please:

-Balance regulatory change with land acquisition to accomplish long term recovery goals;

-Take advantage of the region's recent vote to build 34 miles of new light rail - we must capitalize on this investment by requiring more intense development near these station areas that are pedestrian, bicycle and transit friendly;

-Identify adequate and sustained funding for the long haul;

-Clearly identify timelines and responsibilities;

-Be based on science;

-Set meaningful standards for habitat protection.

The Partnership staff, the Leadership Council, Ecosystem Coordinating Board, Science Panel and stakeholders throughout the Sound deserve praise for the monumental effort involved in producing the draft Action Agenda. The next step is secure much needed funding. The 2009 legislature must adopt new funding sources dedicated to the recovery of Puget Sound by 2020.

For Puget Sound!

From: **Ricky Taylor**

Comment: Dear Leadership Council,

Thank you for the opportunity to comment on the Puget Sound Partnership Draft Action Agenda. I appreciate the tremendous amount of work that has gone into developing it and I support the strong list of measures that, if implemented, will go a long way toward recovering Puget Sound by 2020.

The draft plan includes a few omissions. The final plan should include Outstanding Resource Water (ORW) designation under the Clean Water Act as a tool to help protect rivers and other aquatic habitat. While I strongly support the inclusion of Wild and Scenic designation as a similar tool, in some cases ORW designation will likely prove to be a better, more immediate way for the state to ensure the protection of high quality rivers and other waters. Therefore, I urge the Partnership to include support for the Outstanding Resource Water designation as one of its "Near Term Actions." ORW designations permanently protect high quality waters that are ecologically significant, provide cold

water refuges for fish, and/or support important recreational values. Many rivers in the Puget Sound region are eligible for ORW designation. I would also like to encourage you to include funds to move up the removal of the two dams on the Elwha from 2012 to 2010. Removal of the Elwha dams is one of the best chances for salmon and steelhead recovery in the region as it will open up over 70 miles of prime spawning habitat. Removing these dams has also been as a key action to recover our Puget Sound's orca population, which is malnourished thanks to a lack of chinook salmon.

Especially during difficult financial times, finding opportunities for economic benefit and job creation is important. Removing the Elwha dams provides a tremendous opportunity for creating "green jobs" and numerous other economic benefits.

Thank you for taking my comments into consideration.

From: **Fred Teixeira**

Comment: Dear Leadership Council,

Thank you for the opportunity to comment on the Puget Sound Partnership Draft Action Agenda. I appreciate the tremendous amount of work that has gone into developing it and I support the strong list of measures that, if implemented, will go a long way toward recovering Puget Sound by 2020.

The draft plan includes a few omissions. The final plan should include Outstanding Resource Water (ORW) designation under the Clean Water Act as a tool to help protect rivers and other aquatic habitat. While I strongly support the inclusion of Wild and Scenic designation as a similar tool, in some cases ORW designation will likely prove to be a better, more immediate way for the state to ensure the protection of high quality rivers and other waters. Therefore, I urge the Partnership to include support for the Outstanding Resource Water designation as one of its "Near Term Actions." ORW designations permanently protect high quality waters that are ecologically significant, provide cold water refuges for fish, and/or support important recreational values. Many rivers in the Puget Sound region are eligible for ORW designation. I would also like to encourage you to include funds to move up the removal of the two dams on the Elwha from 2012 to 2010. Removal of the Elwha dams is one of the best chances for salmon and steelhead recovery in the region as it will open up over 70 miles of prime spawning habitat. Removing these dams has also been as a key action to recover our Puget Sound's orca population, which is malnourished thanks to a lack of chinook salmon.

Especially during difficult financial times, finding opportunities for economic benefit and job creation is important. Removing the Elwha dams provides a tremendous opportunity for creating "green jobs" and numerous other economic benefits.

Thank you for taking my comments into consideration.

From: **Elizabeth Tennant**

Comment: Dear Puget Sound Partnership,

I am writing to urge you to improve your action agenda's recommendations on pollution prevention. I believe that Puget Sound is at a tipping point and that urgent action is needed to improve its

prospects. I urge you to take a strong stance with respect to reducing toxic pollution of Puget Sound.

As you undoubtedly are aware, our poor Orcas appear to be dying, Harbor seals and other Puget Sound marine mammals have some of the highest levels of PCBs in their bodies of animals sampled anywhere. Salmon are declining at alarming rates for a variety of reasons, including toxic substances in their environment.

There is extensive scientific evidence about the problems and a clear set of actions that are needed to remedy them. I am convinced that it can be done. The question is whether there is sufficient political will to take those actions. I strongly urge you to form recommendations that rwill let us save Puget Sound for the Orcas and other residents, as well as for our children and grandchildren. I think that this is our last chance.

From: **Cheryl Thomas**

Comment: Dear Puget Sound Partnership,

The Partnership staff, the Leadership Council, Ecosystem Coordinating Board, Science Panel and stakeholders throughout the Sound deserve praise for the monumental effort involved in producing the draft Action Agenda. The next step is to finalize a plan that is accountable, transparent, effective and have dedicated new funding sources to the recovery of Puget Sound by 2020.

The Partnership must create a real 2020 Action Agenda, not just a 2-year plan that clearly identifies the specific actions that are needed over the next 12 years and the HOW and WHO and BY WHEN each action must be completed. All the actions need to be tied together into a comprehensive whole through measurable benchmarks that must be accomplished in order to achieve recovery by 2020.

Thank you for this opportunity to strengthen a strategy to save Puget Sound.

From: **Vicki Thomas**

Comment: Dear Puget Sound Partnership,

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Thank you for this opportunity to strengthen a strategy to save Puget Sound.

From: **Earnest Thompson**

Comment: Dear Puget Sound Partnership,

I am writing to urge you to SAVE THE ORCAS---NO MATTER THE COST!

From: **John Thompson**

Comment: Dear Puget Sound Partnership,

I am writing to urge you to improve your action agenda's recommendations on pollution prevention.

From: **Uwe Tietze**

Comment: Overall comment: Action Agenda is well thought through and written up. As far as targets and benchmarks are concerned, I have the following suggestions: Question 1, page 3: land cover & forest acreage are expected to decrease by 2011 & 2012. I think they should at least remain the same or rather increase than decrease. Likewise, according to the draft action agenda, impervious areas are expected to increase while I would suggest that the target should be that impervious areas should decrease instead. Page 4: eelgrass status and trends: should be specified and quantified in terms of acres; percentage exceedance of instream flows: should be quantified; toxics in pelagic fish: PBDE levels should be quantified.

From: **Gus Tombros**

Comment: Dear Puget Sound Partnership,

The Partnership staff, the Leadership Council, Ecosystem Coordinating Board, Science Panel and stakeholders throughout the Sound deserve praise for the monumental effort involved in producing the draft Action Agenda. The next step is to finalize a plan that is accountable, transparent, effective and have dedicated new funding sources to the recovery of Puget Sound by 2020.

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Thank you for this opportunity to strengthen a strategy to save Puget Sound.

From: **Patricia Tomlin**

Comment: Dear Puget Sound Partnership,

Thank you for your commitment to developing an Action Agenda for a healthy Puget Sound. From struggling orcas to toxic chemicals in our water, the Sound needs quick and decisive action today. I want to make sure we pass a thriving Puget Sound on to future generations.

I urge the Partnership to incorporate accountability, benchmarks of success, and ample funding into this Agenda.

The draft Action Agenda includes many of the essential elements that need to be accomplished, but in addition, the final Action Agenda must also:

-Amend the Cruise Ship MOU to ban all cruise ship discharges in Puget Sound;

-Prioritize the protection and restoration of the State's forage fish spawning beds;

-Complete the Management Plan for the Cherry Point Aquatic Reserve;

-Identify adequate and sustained funding for Plan implementation;

-Update the guidance for open water dredge disposal of PCBs;

-Expand the indicator species to include forage fish abundance and harbor seal toxics loading; and

-Accelerate the restoration of the Elwha River.

Thank you for your hard work to develop a draft Action Agenda to restore, protect and recover Puget Sound to health by 2020.

On behalf of everything from eelgrass to orcas.

From: **Tim Towey**

Comment: It seems the plight of the whales is a lack of food---salmon Sea lions seem to be the greatest cause of salmon not making it back to spawning grounds. The returning salmon are under great pressure by sea lions long before they make it to puget sound-- What sea lions do is eat salmon, poop, and make pups. It's clear that efforts to help spawning more salmon only go to feed sea lions--so they can further degrade water quality by increasing the amount of poo. It's clear to me that you people do not have the political courage to take on what is the most significant issue. I don't think you have to slay sea lions to get the job done. You might consider putting some of your scientific energies into reducing the birth rate of the sea lions. Yes, you'd have to take some guff, but then someone has to lead the way. Good luck anyway.

From: **Mike Town**

Comment: Please accept the attached letter, written originally by Mike Town (Sierra Club volunteer, National Forests Committee) and edited and amended by Rebecca Wolfe, Outreach Team for "Cascades Wild: A Puget Headwaters Initiative" and Conservation Chair of the Snohomish Group, Cascade Chapter, The Sierra Club.

Thank you for your attention to the very important points in these comments.

From: **Mike Town**

Comment: To members of the PSP

I would like to commend the many people who put together the Action Agenda for Puget Sound. The document is well researched, and if followed, will make a lasting impact on the quality of life in this region. I agree with most of the report, but would like a few other points to be considered in the final report. My concerns come from my background in forest ecology and my 9 year participation as the lands expert for the Wild Sky Wilderness project. It is my belief that wilderness protection is one of the most cost effective measures to insure the improvement of the Puget Sound ecosystem. The benefits of wilderness protection meet 3 of the list of actions in the report. For example, wilderness protection avoids problems before they occur (ACTION A) by protecting salmon spawning habitat and ensuing water quality. A robust food web, and cold, clear, clean, water are all components of wilderness protection and critical to a Chinook salmon recovery Plan. Wild Sky protects approximately 13,000 acres of previously cut over low elevation forest mostly found along rivers and streams. Since these lands are forever protected, they will eventually restore (ACTION B) the function of old growth ecosystems. Finally, protecting forests will decrease pollution at the source (ACTION C) by retaining sediment and nutrients.

With Wild Sky as the background, I would suggest that the following minor additions be considered:

1. The provisional targets section lists 6 indicators including farmland protection. I believe that the protection of intact headwater forests be added as a 7th indicator. The increase of permanently protected acres in Wilderness, NRCA or Wild and Scenic status could serve as an easy to measure benchmark which will also maintain or improve water quality (goal #5).

2. The measurable action (Q2 pg 2) of the retention of 90% of low elevation forest by 2020 should be quantified. Words like "low elevation" and "retain" should be defined. For example, does retention mean no harvesting, or development, or both? Two additional suggestion is that you add: A) protection of all existing old growth forest on public lands and B) in order to mitigate the anticipated loss of 10% forest by 2020 - a "no net lose" policy will ensure that an additional 10 % of low elevation public lands be protected.

3. A section that describes watershed restoration in terms of decommissioning the hundreds of miles of poorly designed and unused logging roads should be addressed. The damages from culvert failures, and poorly designed roads along streams, and in riparian areas, are a major cost of sedimentation in the Puget Sound ecosystem. This is especially true with high elevation roads in the National and State Forests.

4. Finally, I am pleased that you stated support for the Alpine Lakes additions and the Pratt River Wild and Scenic proposal. However, adding a section (on page Q3 page9) c) supporting the identification and protection of future Wilderness Areas, NRCA's, Wild and Scenic and other similar public and private designations would be helpful to insure that more critical habitat areas are indeed protected. All throughout the Puget Sound region, people are trying to protect aquatic systems along their banks. However, there are also a great number of people trying to protect watersheds by protecting their headwaters and the forest along tributary streams. The role of these groups needs to be addressed. For example, I am currently working with 12 other environmental groups and organizations in the

Cascades Wild, "A Puget Headwaters Initiative" whose goal is the protection of up to 400,000 acres of Inventoried Roadless lands on the western portion of the cascades. All these acres drain into 17 rivers which eventually lead to the Puget Sound. As a group we could make a significant public education tool for Puget Sound protection as we proceed on our project. It is our belief that headwaters protection on federal land is the most cost effective way of achieving the "snow caps to white caps" protection that the Puget Sound deserves. Therefore, please consider headwaters protec tion through Wilderness, Wild Scenic, NRCA and other similar measures when you rank the action items in your final cost/benefit/readiness/effectiveness analysis.

Thank you for allowing me to comment and congratulation on preparing a tremendously significant document.

From: **Linda Townsend**

Comment: Dear Puget Sound Partnership,

I am writing to urge you to improve your action agenda's recommendations on pollution prevention.

From: **Carol Trasatto**

Comment: Dear Puget Sound Partnership,

I am writing to urge you to improve your action agenda's recommendations on pollution prevention.

Please include the health of the Orca population as well as the presence of dioxin and other such contaminants. Mammals, fish, crustaceans and other beings who live in the Sound give clear indications of the urgency of our collective task.

Health of Puget Sound is a complicated issue, but we will all benefit if we face hard truths together.

From: **Teri Travis**

Comment: Dear Puget Sound Partnership,

The Partnership staff, the Leadership Council, Ecosystem Coordinating Board, Science Panel and stakeholders throughout the Sound deserve praise for the monumental effort involved in producing the draft Action Agenda. The next step is to finalize a plan that is accountable, transparent, effective and have dedicated new funding sources to the recovery of Puget Sound by 2020.

The Partnership must create a real 2020 Action Agenda, not just a 2-year plan that clearly identifies the specific actions that are needed over the next 12 years and the HOW and WHO and BY WHEN each action must be completed. All the actions need to be tied together into a comprehensive whole through measurable benchmarks that must be accomplished in order to achieve recovery by 2020.

Thank you for this opportunity to strengthen a strategy to save Puget Sound.

PugetSoundPartnership
Puget Sound, our community, our chance

From: **Robert Triggs**

Comment: Dear Puget Sound Partnership,

I am writing to urge you to improve your action agenda's recommendations on pollution prevention. I want a healthy Puget Sound to be part of the legacy we leave our children.

Many Washington manufacturers continue to use harmful chemicals without any plans to switch to chemicals that are safer for Puget Sound. To protect public health and the environment, Washington's industry must begin phasing out of the worst toxic chemicals and developing plans to switch to safer alternatives.

Please include recommendations to help move Washington's businesses toward safer alternatives and away from chemicals known to be harmful to Puget Sound. These proposals should include

Increasing the availability of technical assistance to help businesses reduce chemical use.

Developing a state program to focus on researching safer chemicals and materials.

Requiring better industry reporting to Ecology of the chemicals currently being used.

From: **Mirabai Troll**

Comment: Dear Puget Sound Partnership,

Thank you for tackling the enormous challenge of saving Puget Sound head on. We appreciate your boldness and your efforts to engage the broader community, to listen to us and to base your decisions on science.

Surfrider Foundation is committed to supporting your efforts, primarily by encouraging people to get out in the watershed and into the Sound, to enjoy it, to appreciate it and to take action to protect and restore it. Through projects like Rise Above Plastics, beach clean ups and ocean friendly gardens, we will do our best to promote Sound stewardship practices.

In order to make sure that we reach our goal of a healthy Puget Sound by 2020, we ask that you strengthen the Action Agenda by incorporating the following recommendations:

- Be stronger on water quality measures by offering a comprehensive and robust program to prevent all sources of stormwater pollution and strengthening the list of actions for toxic pollution prevention.

- Develop different indicators for human well-being to include more opportunity for quality water-based recreation through increased shoreline access, clean beaches, and clean water.

- Be stronger on accountability by incorporating clear benchmarks to get us to a healthy Puget Sound by 2020.

- Create more opportunities and stronger protection programs to improve the public's interaction with the shoreline and achieve enough water quality improvement and habitat restoration to inspire the public to go to the water's edge more frequently.

- Ensure that there is enough funding for Puget Sound to achieve the goals laid out in this ambitious agenda.

Thank you for your hard work to develop a draft Action Agenda to restore, protect and recover Puget Sound to health by 2020.

From: **Elizabeth Twohig-Gibson**

Comment: First off I would like to thank the members of the Puget Sound Partnership for all the work that they have put into this proposal and the research behind it. I would also like to express my support for this project as some one who had the chance of growing up seeing the Sound and wanting to preserve that for future generations. The proposal is very detailed which helps address specific questions that come up while reading.

One of the best parts is the actual break down of what a healthy Sound is defined in question one. This gives probably the greatest insight into the goals that the Partnership is trying to pursue. Reading over question three where the actual plan of what actions should be taken brought both positive feedback and some suggestions.

Over all sounds like one of the best, most though out, plans that has been proposed recently. I notices that the Hood Canal waters were mentioned quire a few times in this section relating to the problems with dissolved oxygen depletion in the are, which is great as it is a major problem, however I did not see any suggestions as to what action would take place or how this might be handled.

I would like to have more specifics I guess in proposed treatments to such ecological problems. The other main critique that I had about question three is the talk about aggressively responding to invasive species. While I do understand it as an approach to preserve the current ecosystem in an area is just seems like it will be a problems to enforce. First of all the definition of what an invasive species can be difficult to define. Also with the current state of Global Warming two obvious things that will happen are that while the environment changes the species in a habitat will either evolve to adjust to the changes there or they will have to relocate. When this happens another species will come in a occupy the niche that the other species held. When this happens is species one which leaves an invasive species in another habitat that needs to be kept out from their new place and is species two an invasive species when they step up to occupy an abandoned place in a local ecosystem. I do hate to be overly critical though because over all is does seem like a good proposal with some kind of plan even as to how the suggestions should be implemented.

From: **Wayne Ude**

Comment: Dear Leadership Council,

Thank you for the opportunity to comment on the Puget Sound Partnership Draft Action Agenda. I appreciate the tremendous amount of work that has gone into developing it and I support the strong list of measures that, if implemented, will go a long way toward recovering Puget Sound by 2020.

The draft plan includes a few omissions. The final plan should include Outstanding Resource Water (ORW) designation under the Clean Water Act as a tool to help protect rivers and other aquatic

habitat. While I strongly support the inclusion of Wild and Scenic designation as a similar tool, in some cases ORW designation will likely prove to be a better, more immediate way for the state to ensure the protection of high quality rivers and other waters. Therefore, I urge the Partnership to include support for the Outstanding Resource Water designation as one of its "Near Term Actions." ORW designations permanently protect high quality waters that are ecologically significant, provide cold water refuges for fish, and/or support important recreational values. Many rivers in the Puget Sound region are eligible for ORW designation. I would also like to encourage you to include funds to move up the removal of the two dams on the Elwha from 2012 to 2010. Removal of the Elwha dams is one of the best chances for salmon and steelhead recovery in the region as it will open up over 70 miles of prime spawning habitat. Removing these dams has also been as a key action to recover our Puget Sound's orca population, which is malnourished thanks to a lack of chinook salmon.

Especially during difficult financial times, finding opportunities for economic benefit and job creation is important. Removing the Elwha dams provides a tremendous opportunity for creating "green jobs" and numerous other economic benefits.

Thank you for taking my comments into consideration.

From: **Kari Ulatoski**

Comment: I have been deeply concerned with the health of Puget Sound and find a total disconnect between the words/intentions in documents and the actions taken by the state in supporting (by ommission and commission) the actions of Glacier Northwest on Maury Island. There has been too much political/monetary pressure from a multi billion dollar corporation in influencing the outcome of something that could be potentially disasterous to the quality of life around those environs. Inadequate arsenic containment, leaching of salt water or heavy metals into a sole source aquifer (digging gravel 10-15 outside of the aquifer!), not to mention earthquakes and ground slippage. I can't even get reasonable earthquake coverage for my house now because I live in a "high slippage zone." What precautions has Glacier taken to address that? The state and governor should now commit and take an active interest in insuring that the quality of life for all inhabitants of this part of Puget Sound is improved, not threatened. The Governor has been dangerously quiet and unresponsive publicly. It is now time for her to take a stand. Actions speak louder than words and I have heard and seen nothing from the highest office in the state regarding preservation of this area.

From: **Phillip Unterschuetz**

Comment: Dear Puget Sound Partnership,

Thank you for your hard work to develop a draft Action Agenda to restore, protect and recover Puget Sound to health by 2020. It could not come at a more pressing time, especially for the Sound's iconic and endangered orca whale. Just this month, researchers reported seven orcas "10% of the Puget Sound population" are missing and believed to be dead. Some experts say dwindling populations of endangered Chinook salmon are at least partly to blame. Is this a sign that our ecosystem is on the verge of collapsing?

The urgency of restoring the Sound to health is at a tipping point and missing orcas are the Sound's

“canaries in the coal mine,” telling us we are running out of time. But there is hope for the orca, as there was hope for the bald eagle, the California Condor and others on the verge of extinction. The Puget Sound Partnership’s Action Agenda is a golden opportunity to do what has not been done for over 20 years- develop and implement a recovery plan that is accountable, effective, transparent and decisive with sustained funding to restore this national treasure to health by 2020.

The draft Action Agenda includes many of the essential elements that need to be done:

-Require low-impact development to reduce stormwater pollution;

-Prohibit new bulkheads near feeder bluffs and forage fish spawning beaches;

-Fund local governments to develop and carry out shoreline master programs;

-Fund enforcement staff at state agencies and local governments;

-Implement specific, aggressive cleanup plans for polluted waters, including TMDLs;

-Fully fund a permanent year-round rescue tug at Neah Bay for oil spill prevention;

-Acquire critical intact parcels for habitat protection and conservation;

-Set strong requirements for water quantity, such as setting in-stream flow for all major rivers.

BUT, more than a list of Soundwide and Action Area-specific actions, the Partnership must create a real 2020 Action Agenda, not just a 2-year plan, that clearly identifies the specific actions that are needed over the next 12 years and the HOW and WHO and BY WHEN each action must be completed. All the actions need to be tied together into a comprehensive plan with measurable benchmarks and timelines in order to achieve recovery by 2020. The final Action Agenda must:

-Clearly identify timelines and responsibilities;

-Identify adequate and sustained funding for the long haul;

-Be a visionary and long term plan;

-Be based on science;

-Offer a comprehensive and robust program to prevent all sources of stormwater pollution, not just municipal stormwater;

-Strengthen the list of actions for toxic pollution prevention;

-Set meaningful standards for habitat protection;

-Balance regulatory change with land acquisition to accomplish long term recovery goals;

-Expand the indicator species to include more than just salmon, i.e. forage fish, harbor seals, etc.

The Partnership staff, the Leadership Council, Ecosystem Coordinating Board, Science Panel and stakeholders throughout the Sound deserve praise for the monumental effort involved in producing the draft Action Agenda. The next step is secure much needed funding. The 2009 legislature must adopt

new funding sources dedicated to the recovery of Puget Sound by 2020.

For Puget Sound!

From: **Selim Uzuner**

Comment: Dear Puget Sound Partnership,

I am writing to urge you to improve your action agenda's recommendations on pollution prevention. I want a healthy Puget Sound to be part of the legacy we leave our children.

Many Washington manufacturers continue to use harmful chemicals without any plans to switch to chemicals that are safer for Puget Sound. To protect public health and the environment, Washington's industry must begin phasing out of the worst toxic chemicals and developing plans to switch to safer alternatives.

Please include recommendations to help move Washington's businesses toward safer alternatives and away from chemicals known to be harmful to Puget Sound. These proposals should include:

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Developing a state program to focus on researching safer chemicals and materials.

Requiring better industry reporting to Ecology of the chemicals currently being used.

From: **Robert Vadas, Jr.**

Comment: Dear Puget Sound Partnership,

Thank you for your hard work to develop a draft Action Agenda to restore, protect and recover Puget Sound to health by 2020. When it comes to restoring the health of the Puget Sound, where and how we grow matters. Especially in light of the one million new residents the state expects to welcome by 2020. It's more crucial than ever to focus that growth inside our urban areas so that we can preserve our farm and forest land and protect our rural areas to restore critical habitats and watersheds of the Sound.

While I applaud your effort thus far, the Action Agenda can and must go farther. We need a twenty year plan, not a two year plan. All the actions need to be tied together into a comprehensive plan with measurable benchmarks and timelines in order to achieve recovery by 2020.

As you finalize the final Action Agenda, please:

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-Take advantage of the region's recent vote to build 34 miles of new light rail - we must capitalize on this investment by requiring more intense development near these station areas that are pedestrian, bicycle and transit friendly;

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For Puget Sound!

From: **Karla Van Leaven**

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- Be stronger on accountability by incorporating clear benchmarks to get us to a healthy Puget Sound by 2020.

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- Ensure that there is enough funding for Puget Sound to achieve the goals laid out in this ambitious agenda.

Thank you for your hard work to develop a draft Action Agenda to restore, protect and recover Puget Sound to health by 2020. It's time to stop poisoning our seas!

From: **Ken VanBuskirk**

Comment: I read through the draft action agenda and have just a couple comments. I appreciate all the work that has gone into such a daunting task. I wholeheartedly agree that we need to focus on storm water, and site our urban areas away from environmentally sensitive lands. Providing clean and adequate water for mankind, birds and animals is of paramount importance. A fine example of where an urban growth area shouldn't be is in the river valley,on top of a critical aquifer recharge area. It is one example I'm acutely aware of as it is my home.

Item 4.3, I appreciate efforts to protect and support viable working farms, local sustainable agriculture is a key ingredient to success for our communities.

All efforts undertaken to protect the waterways of Puget Sound need to be looked at and prioritized from a broad landscape prospective and have scientific backing and community support. , Rather than focus on quick, and easy government grant, subsidized fixes. For example removing and restoring dikes around a freshwater wetland, (former agricultural land), to revert the land to a salt marsh state will not be effective unless upland areas in the same river ecosystem are dealt with as well and the science backs up the solution. . I have attached two pictures that show a gravel pit and "bank armoring" of the Union River in Mason County, while 1/2 mile away, near the mouth of the same river they are planning to remove dikes. Enforcement of existing regulations needs to be strengthened.

See VanBuskirk, Ken attachments.

PugetSoundPartnership
our sound, our community, our chance

From: **Maha Varad**

Comment: Dear Puget Sound Partnership,

I am writing to urge you to improve your action agenda's recommendations on pollution prevention.

From: **Lucy Vaughters**

Comment: Dear Puget Sound Partnership,

I am writing to urge you to improve your action agenda's recommendations on pollution prevention. I am deeply grieving over the possible loss of one of our Orca pods; the Orca and the salmon are symbols of the natural beauty of our region. How tragic it would be if we did not do the right thing and restore their habitat by cleaning up the shameful toxins we simply dump into the Sound.

Thank you for your concern on this matter.

From: **Genevieve Vayda**

Comment: Dear Puget Sound Partnership,

I am writing to urge you to improve your action agenda's recommendations on pollution prevention.

From: **Scott Veirs**

Comment: Main new content I think you should consider: The word "noise" doesn't exist in this agenda. Underwater noise should be included specifically as a form of pollution that affects water quality. Emerging peer-reviewed science (which I can provide!) makes it clear that anthropogenic noise is causing killer whales to call louder then normal. Noise also has the potential to make it impossible for killer whales to find the (scarce?) salmon they hunt within the Salish Sea.. Thus, it is ironic that the People for Puget Sound have dubbed the current marine state "the silent crisis." Spend a few hours listening to http://orcasound.net as you edit the Agenda and you'll hear what I mean...

INTRO: What is a "vibrant economy?" The definition of that phrase should be made crystal-clear in this sort of Agenda, right along with "healthy Puget Sound." (What is the population plan for Puget Sound humans?) Overall, the agenda seems to focus excessively on run-off pollution and terrestrial habitat degradation relative to other threats like pollution already in the marine environment (POPs, noise) and marine harvest (commercial, subsistence, recreational).

It is staggering to me that, in specifying the biggest threats to PS (Page 2, basic question 2), the harvest of marine species is not mentioned. For most species except anadromous fish, it is patently false that the greatest threats to the marine environment originate on land!

The first sentence of the Financing Chapter reveals three prominent marine activities that each pose

potential threats to Puget Sound: "$100 million per year in fishing and shellfish revenues, $3 billion per year from regional tourism and $490 million per year from boating." Have these marine threats been quantified and deemed small? Even for salmon, harvest history and current practice should be appraised in the plan. Orcas were decimated by humans shooting or capturing them and now are impacted by vessel noise and threatened by oil spills; their POP load, lack of fish, and exposure to pathogens do not trump the purely marine threats! A single SCUBA dive at Edmonds underwater park makes it clear that listed groundfish have been overharvested and underprotected.

Strategies A and B should emphasize species or organisms just as the Governor's goal (c) does (on page 8). On page 4, the Agenda incorporates salmon recovery work by stating that "recreational, sustenance and commercial catch is also highlighted as a human well-being outcome." That's good, but why aren't those activities high-lighted as a threat (or at least a potential one) somewhere in this introduction?

Also on page 4: who the hell is going to understand what "artificial propagation" means?! Just call it hatcheries and aquaculture (as you do on page 6). Re-branding these familiar terms and the issues they evoke is so Bush-Rovian (annoying). Shame on you.

On page 5: the PSP will be "continuing to improve the integration of habitat, hatchery, and harvest actions." Will PSP be asking the tough questions (e.g. on behalf of the killer whales) during the North of Falcon process and the meetings of the WDFW in which recreational fishing policies are set? Who will be forcing us all to at least discuss whether fishing for particular species is appropriate at all in the Salish Sea? The watershed groups are unlikely to influence the catch, I'm afraid...

Q1, Page 1: change hikers to boaters, fishers, and SCUBA divers (to keep emphasis on marine environment when discussing "Puget Sound")

Q2, Page 2: I dislike the Action Agenda's Human Well-Being measure: % lowland forest in 2001. I think number of sport fishing days, or a direct measure of fish abundance and diversity (possibly through the reef.org fish surveys) would be much more appropriate for assessing the status of Puget Sound (a marine environment, not a terrestrial one).

Q2, Page 2, paragraph 3: change "summaries" to "summarizes"

Q2, Page 6: change "current the" to "the current"

Q2, Page 7: change "alternation" to "alteration"

I like Priority A2 (particularly A.2.1.3): Implement a strategic network of Marine Managed Areas that contribute to conserving the biological diversity and ecosystem health of Puget Sound.

A3, paragraph 1: change "maybe" to "may be" D 1.4-1.6 are HUGELY important and get single lines of attention in the core of the agenda and almost no mention in the introduction...

From: **Phoenix Vie**

Comment: Dear Puget Sound Partnership,

I am writing to urge you to improve your action agenda's recommendations on pollution prevention.

I'm a past Washington resident, & know & love the Puget Sound. Please strengthen protection of orcas & other wildlife who are greatly affected by the actions you decide upon.

From: **John Vieira**

Comment: Dear Puget Sound Partnership,

I am writing to urge you to improve your action agenda's recommendations on pollution prevention. I want a healthy Puget Sound to be part of the legacy we leave our children.

Many Washington manufacturers continue to use harmful chemicals without any plans to switch to chemicals that are safer for Puget Sound. To protect public health and the environment, Washington's industry must begin phasing out of the worst toxic chemicals and developing plans to switch to safer alternatives.

Please include recommendations to help move Washington's businesses toward safer alternatives and away from chemicals known to be harmful to Puget Sound. These proposals should include

Increasing the availability of technical assistance to help businesses reduce chemical use.

Developing a state program to focus on researching safer chemicals and materials.

Requiring better industry reporting to Ecology of the chemicals currently being used.

From: **Robert Viens**

Comment: My name is Rob Viens and I am an Environmental Science Instructor at Bellevue Community College. I had my class read the Draft Action Plan and we discussed it today as part of a class assignment. Students were also encouraged to send their comments on the plan to you, so you may see some come in throughout the day. (It was not required, so I think you will only be getting comments from the students who really want to share their ideas

:)) I thought I would also pass on a couple of additional comments that I summarized from the discussion.

Some suggestions summarized from out class discussion:

(1) On the financial side - include some discussion of the creation of new

(green) jobs that may come out of these projects (resource management, science-related, construction, new materials, etc.). This may offset a lot of the costs. With the coming budget crisis it would be great to show how we economically benefit in more detail.

(2) More emphasis needs to be placed on the role of individuals in the clean up efforts (particularly in regards to Question C). There needs to be a major education component, and it needs to start in the schools. This is partly to get more public buy-in and also to get more people involved in the solution. (The group really felt strongly about having more youth

involvement.)

(3) Include more discussion of the impacts on, and involvement of the tribes.

(4) When considering partnerships, think about the role of local non-profit organizations that have similar goals (e.g., Sightline's emphasis on high density development).

(5) How much of the $3.5 billion in industry would actually be impacted by a "dirty" sound and where can we save money on cleanup by redirecting existing funds?

(6) Are there education components that could be "legislated"? For example, could it be mandated that all K-12 education includes a unit on environmental responsibility, etc.

(7) Since a lot of the pollution sources are related to transportation, look into more linkages with transportation plans/funding. Also are there ways to include "leak" checks or something similar along with emissions testing.

(8) Not sure how to address this - in light of the recent decision on SONAR (Navy vs. Whales) at what point do rules and regulations for cleanup get overridden by other needs?

(9) Include more on the impacts of toxic fish. It was felt that if the human impacts where emphasized a little more, it might lend more general support to the plan.

We all agreed that the economic impacts need to be considered, but the cleanup now is necessary to prevent long-term economic and ecological cost (regardless of the costs today).

Thanks and best of luck in getting through the upcoming budget crisis! We look forward to hearing how it goes.

Rob Viens

PS - On a personal note - please keep in mind that college students are a great resource for projects like this. We are always looking for practical assignments, such as restoration work, reviewing plans (like this one), serving as test groups, etc. Real-life learning opportunities help students learn and can help the Sound at the same time. Please let me know if you have any questions for me.

From: **John Vinson**

Comment: Dear Puget Sound Partnership,

Thank you for your commitment to developing an Action Agenda for a healthy Puget Sound. From struggling orcas to toxic chemicals in our water, the Sound needs quick and decisive action today. I want to make sure we pass a thriving Puget Sound on to future generations.

I urge the Partnership to incorporate accountability, benchmarks of success, and ample funding into this Agenda.

The draft Action Agenda includes many of the essential elements that need to be accomplished, but in addition, the final Action Agenda must also:

-Amend the Cruise Ship MOU to ban all cruise ship discharges in Puget Sound;

-Prioritize the protection and restoration of the State's forage fish spawning beds;

-Complete the Management Plan for the Cherry Point Aquatic Reserve;

-Identify adequate and sustained funding for Plan implementation;

-Update the guidance for open water dredge disposal of PCBs;

-Expand the indicator species to include forage fish abundance and harbor seal toxics loading; and

-Accelerate the restoration of the Elwha River.

Thank you for your hard work to develop a draft Action Agenda to restore, protect and recover Puget Sound to health by 2020.

On behalf of everything from eelgrass to orcas.

From: **Jeffrey Virgin**

Comment: Dear Puget Sound Partnership,

I fully support the efforts of all the groups involved in taking a comprehensive and dedicated approach to restoring and protecting our environment. The actions proposed in the Action Agenda will carry us a long way toward the goal of saving our environment. We must not falter in sustaining our vision and our effort as we move forward. We must learn to build an economy that enhances rather than degrades nature. Our very survival depends on it.

The Partnership staff, the Leadership Council, Ecosystem Coordinating Board, Science Panel and stakeholders throughout the Sound deserve praise for the monumental effort involved in producing the draft Action Agenda. The next step is to finalize a plan that is accountable, transparent, effective and have dedicated new funding sources to the recovery of Puget Sound by 2020.

The Partnership must create a real 2020 Action Agenda, not just a 2-year plan that clearly identifies the specific actions that are needed over the next 12 years and the HOW and WHO and BY WHEN each action must be completed. All the actions need to be tied together into a comprehensive whole through measurable benchmarks that must be accomplished in order to achieve recovery by 2020.

Thank you for this opportunity to strengthen a strategy to save Puget Sound.

From: **Judy Visser**

Comment: Dear Puget Sound Partnership,

I am writing to urge you to improve your action agenda's recommendations on pollution prevention.

From: **Carol von Borstel**

Comment: Dear Puget Sound Partnership,

I used to work in public education. I have seen many wonderful plans that were never implemented because the accountability pieces were not carefully designed. Please finish the job with the energy and foresight with which you started it.

The Partnership staff, the Leadership Council, Ecosystem Coordinating Board, Science Panel and stakeholders throughout the Sound deserve praise for the monumental effort involved in producing the draft Action Agenda. The next step is to finalize a plan that is accountable, transparent, effective and have dedicated new funding sources to the recovery of Puget Sound by 2020.

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Thank you for this opportunity to strengthen a strategy to save Puget Sound.

From: **Jodi Wade**

Comment: Dear Puget Sound Partnership,

I am writing to urge you to improve your action agenda's recommendations on pollution prevention. We need to clean up and restore Puget Sound before it's too late.

From: **Mare Wahosi**

Comment: Dear Puget Sound Partnership,

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-Accelerate the restoration of the Elwha River.

Thank you for your hard work to develop a draft Action Agenda to restore, protect and recover Puget Sound to health by 2020.

On behalf of everything from eelgrass to orcas.

From: **Kingston Wall**

Comment: Hi, Puget Sound Partnership.

Please feel free to add me as an endorsing your agenda. Also, please feel free to let me know how I can advance your goals and agenda.

From: **Jeff Wallace**

Comment: Dear Puget Sound Partnership,

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Thank you for this opportunity to strengthen a strategy to save Puget Sound.

From: **David Walseth**

Comment: Dear Puget Sound Partnership,

I live on beautiful Hood Canal. We have been waiting along time for some action to be lead through various state agencies with apparent failure of coordiantion. I hope tht you can actually fine the political power to start to do something. I recognize tht value of planning but there is great danger in expending so much energy onplanning that the inertia behind you efforts is spent before anything is

done. Please get on with it.

The urgency of restoring the Sound to health is at a tipping point and missing orcas are the Sound's "canaries in the coal mine," telling us we are running out of time. But there is hope for the orca, as there was hope for the bald eagle, the California Condor and others on the verge of extinction. The Puget Sound Partnership's Action Agenda is a golden opportunity to do what has not been done for over 20 years- develop and implement a recovery plan that is accountable, effective, transparent and decisive with sustained funding to restore this national treasure to health by 2020.

The draft Action Agenda includes many of the essential elements that need to be done:

-Require low-impact development to reduce stormwater pollution;

-Prohibit new bulkheads near feeder bluffs and forage fish spawning beaches;

-Fund local governments to develop and carry out shoreline master programs;

-Fund enforcement staff at state agencies and local governments;

-Implement specific, aggressive cleanup plans for polluted waters, including TMDLs;

-Fully fund a permanent year-round rescue tug at Neah Bay for oil spill prevention;

-Acquire critical intact parcels for habitat protection and conservation;

-Set strong requirements for water quantity, such as setting in-stream flow for all major rivers.

BUT, more than a list of Soundwide and Action Area-specific actions, the Partnership must create a real 2020 Action Agenda, not just a 2-year plan, that clearly identifies the specific actions that are needed over the next 12 years and the HOW and WHO and BY WHEN each action must be completed. All the actions need to be tied together into a comprehensive plan with measurable benchmarks and timelines in order to achieve recovery by 2020. The final Action Agenda must:

-Clearly identify timelines and responsibilities;

-Identify adequate and sustained funding for the long haul;

-Be a visionary and long term plan;

-Be based on science;

-Offer a comprehensive and robust program to prevent all sources of stormwater pollution, not just municipal stormwater;

-Strengthen the list of actions for toxic pollution prevention;

-Set meaningful standards for habitat protection;

-Balance regulatory change with land acquisition to accomplish long term recovery goals;

-Expand the indicator species to include more than just salmon, i.e. forage fish, harbor seals, etc.

The Partnership staff, the Leadership Council, Ecosystem Coordinating Board, Science Panel and

stakeholders throughout the Sound deserve praise for the monumental effort involved in producing the draft Action Agenda. The next step is secure much needed funding. The 2009 legislature must adopt new funding sources dedicated to the recovery of Puget Sound by 2020.

I know there is not much money today. But a new set of reasonable environmental regulations that would stop new pollution sources could be a low-budget starting point.

From: **Casey Wamble**

Comment: Dear Puget Sound Partnership,

The Partnership staff, the Leadership Council, Ecosystem Coordinating Board, Science Panel and stakeholders throughout the Sound deserve praise for the monumental effort involved in producing the draft Action Agenda. The next step is to finalize a plan that is accountable, transparent, effective and have dedicated new funding sources to the recovery of Puget Sound by 2020.

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Thank you for this opportunity to strengthen a strategy to save Puget Sound.

From: **Susan Ward**

Comment: Dear Puget Sound Partnership,

The Partnership staff, the Leadership Council, Ecosystem Coordinating Board, Science Panel and stakeholders throughout the Sound deserve praise for the monumental effort involved in producing the draft Action Agenda. The next step is to finalize a plan that is accountable, transparent, effective, and one that has dedicated new funding sources to the recovery of Puget Sound by 2020.

The Partnership must create a real 2020 Action Agenda, not just a 2-year plan, that clearly identifies the specific actions that are needed over the next 12 years. HOW and WHO and BY WHEN each action must be completed are vital components. All the actions need to be tied together into a comprehensive whole, with mandatory, measurable benchmarks, in order to achieve recovery by 2020.

Thank you for this opportunity to strengthen a strategy to save Puget Sound.

From: **Patti Warden**

Comment: Dear Puget Sound Partnership,

I am writing to urge you to improve your action agenda's recommendations on pollution prevention. Please either offer businesses less harmful alternatives to the chemical pollutants they now use, or

point them toward research that will offer them those alternatives.

From: **Judith Ware**

Comment: Dear Puget Sound Partnership,

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-Accelerate the restoration of the Elwha River.

Thank you for your hard work to develop a draft Action Agenda to restore, protect and recover Puget Sound to health by 2020.

On behalf of everything from eelgrass to orcas.

From: **Daniel Warner**

Comment: Dear Puget Sound Partnership,

What you've got here is a promising start. Thanks.

Here in Whatcom County we have had various environmental-type programs that, when initiated, seemed promising. The problem comes with executing the plan and funding.

Execution is difficult because people think plans to protect the environment will limit what they can do with land or constrain "growth." (Growth is really the problem, of course.) But reasonable regulations can be accepted

Funding is more difficult. It often seems that programs to provide for a sustainable future meet funding

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cut-offs when jurisdictions are faced with needs for jails, police, roads and the like.

A long-term plan, for ten or twenty years, is better than a short-term one.

Thanks for your work and best regards.

From: **Patricia Waterston**

Comment: Dear Puget Sound Partnership,

I am writing to urge you to improve your action agenda's recommendations on pollution prevention. The plight of the Orca is the plight of all mammals. With many plants and animals near extinction, will humans make the obvious connection to themselves? The world (and the sea) is our nest, and we are fouling it constantly through neglect and sheer ignorance.

Please speed up not only your education efforts but the l organization to change the picture. I think the political will is now here.

From: **Hermian Watkins**

Comment: Dear Puget Sound Partnership,

I am writing to urge you to improve your action agenda's recommendations on pollution prevention.

From: **Carol Watts**

Comment: Dear Leadership Council,

Thank you for the opportunity to comment on the Puget Sound Partnership Draft Action Agenda. I appreciate the tremendous amount of work that has gone into developing it and I support the strong list of measures that, if implemented, will go a long way toward recovering Puget Sound by 2020.

The draft plan includes a few omissions. The final plan should include Outstanding Resource Water (ORW) designation under the Clean Water Act as a tool to help protect rivers and other aquatic habitat. While I strongly support the inclusion of Wild and Scenic designation as a similar tool, in some cases ORW designation will likely prove to be a better, more immediate way for the state to ensure the protection of high quality rivers and other waters. Therefore, I urge the Partnership to include support for the Outstanding Resource Water designation as one of its "Near Term Actions." ORW designations permanently protect high quality waters that are ecologically significant, provide cold water refuges for fish, and/or support important recreational values. Many rivers in the Puget Sound region are eligible for ORW designation. I would also like to encourage you to include funds to move up the removal of the two dams on the Elwha from 2012 to 2010. Removal of the Elwha dams is one of the best chances for salmon and steelhead recovery in the region as it will open up over 70 miles of prime spawning habitat. Removing these dams has also been as a key action to recover our Puget Sound's orca population, which is malnourished thanks to a lack of chinook salmon.

Especially during difficult financial times, finding opportunities for economic benefit and job creation is important. Removing the Elwha dams provides a tremendous opportunity for creating "green jobs" and numerous other economic benefits.

Thank you for taking my comments into consideration.

From: **Brian Weatherby**

Comment: Dear Puget Sound Partnership,

Thank you for your hard work to develop a draft Action Agenda to restore, protect and recover Puget Sound to health by 2020. It could not come at a more pressing time, especially for the Sound's iconic and endangered orca whale. Just this month, researchers reported seven orcas "10% of the Puget Sound population" are missing and believed to be dead. Some experts say dwindling populations of endangered Chinook salmon are at least partly to blame. Is this a sign that our ecosystem is on the verge of collapsing?

The urgency of restoring the Sound to health is at a tipping point and missing orcas are the Sound's "canaries in the coal mine," telling us we are running out of time. But there is hope for the orca, as there was hope for the bald eagle, the California Condor and others on the verge of extinction. The Puget Sound Partnership's Action Agenda is a golden opportunity to do what has not been done for over 20 years- develop and implement a recovery plan that is accountable, effective, transparent and decisive with sustained funding to restore this national treasure to health by 2020.

The draft Action Agenda includes many of the essential elements that need to be done:

-Require low-impact development to reduce stormwater pollution;

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-Implement specific, aggressive cleanup plans for polluted waters, including TMDLs;

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-Acquire critical intact parcels for habitat protection and conservation;

-Set strong requirements for water quantity, such as setting in-stream flow for all major rivers.

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-Be a visionary and long term plan;

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-Offer a comprehensive and robust program to prevent all sources of stormwater pollution, not just municipal stormwater;

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-Expand the indicator species to include more than just salmon, i.e. forage fish, harbor seals, etc.

The Partnership staff, the Leadership Council, Ecosystem Coordinating Board, Science Panel and stakeholders throughout the Sound deserve praise for the monumental effort involved in producing the draft Action Agenda. The next step is secure much needed funding. The 2009 legislature must adopt new funding sources dedicated to the recovery of Puget Sound by 2020.

For Puget Sound!

PugetSoundPartnership
our sound, our community, our chance

Michael Webb
Environmental Scientist
1215 North K Street
Tacoma, WA 98403

November 20, 2008

RE: Comments on the Draft Puget Sound Action Agenda

Dear PSP Leadership Council:

Introduction to the Surfrider Foundation

The Surfrider Foundation is a non-profit grassroots organization dedicated to the protection and enjoyment of our world's oceans, waves and beaches. Founded in 1984 by a handful of visionary ocean enthusiasts in Malibu, California, the Surfrider Foundation now maintains over 50,000 members and 80 chapters worldwide, including five in Washington State and two on the Olympic Peninsula. Our members frequently submerge themselves in Sound waters. For this reason, they are particularly interested in the quality of the water, access to the shoreline, and solutions to the degradation of beaches due to cigarette butts and marine debris (almost entirely comprised of plastics). In addition, we care about the overall health of the ecosystem, including the human as well as the ecological communities in and adjacent to the Puget Sound's boundaries.

Personal Testimony by Mike Webb

Thank you for this opportunity to testify and for all your great work in developing the Action Agenda. I have a dual role sitting in this seat today, one as a private citizen and volunteer member for Surfrider Foundation and one representing Surfrider Foundation's Washington Policy Coordinator, Jody Kennedy, who found herself scheduled for an Olympic Coast Marine Sanctuary meeting in Port Angeles this morning. I have been personally supporting the Puget Sound Partnership since the initial proposals in the Legislature and have participated in some of the public meetings in my South Sound area. Surfrider Foundation is one of the multiple groups that comprise the Puget Sound Partnership Environmental Caucus. The Caucus has submitted comments on the Action Agenda that reflect the input of many dedicated people. Surfrider fully supports the content of those comments. My testimony here addresses particular issues dear to the members of Surfrider Foundation.

I am a recreational user of the South Puget Sound. I have been engaged in ocean recreation since early childhood and took up sea-kayaking immediately upon arriving in Washington in 1995. I have been an avid surf-rider, i.e. surfer, since the early Sixties and more recently a booster for the "new" sport, stand-up paddleboarding (which is beginning to gain steam the last couple of years, even on the Puget Sound and along the Oregon and Washington coasts).

I am the Chairperson for the South Sound Chapter of Surfrider Foundation. The South Sound Chapter is one the four all-volunteer Surfrider Foundation Chapters active along the shorelines of the Puget Sound. Our members care deeply about

the water quality, public access to the shoreline, and human impacts in the form of discarded rubbish frequently found along the shoreline.

Since arriving in Washington, I have been engaged professionally in environmental site management and storm water treatment technology. My perspectives are informed by my professional experience, but my comments here are derived from my personal engagement recreationally around the Sound.

I am disgusted by the scum and odor that develops in Budd Inlet in the summer. There are some spectacular stretches of beach around the South Sound, but for the most part they are not in public areas. What few public areas are available were once habitat for the famous Olympia Oyster; some of those areas are now covered with silt and decaying organic matter. The water is cloudy, the areas are closed to shellfish harvest due to pollution, and the smell is frequently not pleasant. They are not popular places for people to congregate. **I am not surprised that people do not know that South Sound is degraded – there is very little public access and what we have available has been degraded for some time** (recall the Shifting Baselines video).

Areas in the South Sound not exposed to significant water movement and wave action will naturally be structurally muddy and not particularly a "showcase beach." But the relationship between water quality, upland runoff and leaching, and the state of decay on the beach, muddy or not, is very obvious in the parts of the South Sound with which I am familiar. My question is "Who speaks for the Mud?" (sorry for the poetic license) The mud, mucky as it may be, deserves our love and appreciation for the functions it can serve if we give it a chance!

Stuff in Budd Inlet

The Draft Action Agenda presented by the Partnership is a monumental step forward in addressing the most pressing threats plaguing Puget Sound. The Agenda speaks to sound science, captures an ecosystem-based management model, and addresses some key issues near and dear to me, such as funding for the Neah Bay Rescue Tug.

In order to make sure that we reach our goal of a healthy Puget Sound by 2020, we ask that you strengthen the Action Agenda by incorporating the following recommendations:

- Be stronger on water quality measures by offering a comprehensive and robust program to prevent all sources of storm water pollution (toxics, turbidity, nutrients, BOD, and pathogens).
- Develop different indicators for human well-being. Use measures that relate to increased opportunities for water-based recreation through increased shoreline access, clean beaches, and clean water (these should encompass improved fishing and recreational shellfish harvest capacity as well).
- Be stronger on accountability by incorporating more pertinent benchmarks to get us to a healthy Puget Sound by 2020.
- Create more opportunities and stronger protection programs to improve the public's interaction with the shoreline; achieve enough water quality improvement and habitat restoration to inspire the public to go to the water's edge more frequently.
- Ensure that every possible source of funding is fervently sought so there is enough financial "head" (to use a hydraulic term) to achieve the goals laid out in your ambitious agenda.

Let me briefly tease out some of the details from my perspective. My guess is that how **and how soon** the details are filled in behind the Action Agenda will

determine the overall success of restoring the Sound by 2020. I ask that you find a way to make sure the logistics for the following questions are first and foremost in the minds of the Council and are immediately attacked once you start moving forward.

- **How will the public, business and local communities be engaged?**
- **How will regulatory simplification and accountability be built into the process?**

I see concern on all sides of the current discussion that the future looks dim if one or another party gets their way. As a counterpoint, there needs to be a strong statement regarding the positive relationship between environmental protection and future economic development in the Puget Sound Basin moving forward. I have not seen a convincing presentation using the tools of environmental economics that might motivate the stewards of the built environment (the degraded infrastructure) or those with a stake in the to-be-built community (upland businesses, marine business, the local communities, and environmental advocates) to work together and establish cooperative agreements. They all need to hear:

- What's in it for them?
- How can their areas of concern be improved by the Partnership's effect on regulations and funding?

I recommend the Council make a strong case that the success of the Puget Sound recovery to a great extent depends on ALL of the following actions being addressed in a synchronous and win-win fashion:

a) The overlapping shoreline, critical area, and local jurisdiction-driven permitting can be simplified.
b) The permitting process can reward projects that do the right thing, and
c) New types of cooperative agreements will be made at a watershed level.

Highlight and explain how the successes of Watershed Councils and the State's WRIA system have achieved win-win actions. These approaches were at the base of the rationale for the formation of the Puget Sound Partnership. Inherent in the successes moving forward will be a clear and robust process for supporting local jurisdictions financially in reaching watershed goals. The necessary accountability follows through establishing benchmarks and using the power of the purse strings.

The leaders around the Sound, and the South Sound in particular, can build on the successes of programs like the EPA's Brownfields Program to breathe life back into this once productive area. In particular, Brownfields successes in the State of Washington have employed leveraging of multiple sources of funding and of partnerships developed with municipalities, businesses, and non-profits like the Environmental Coalition of South Seattle (ECOSS). The business community and municipalities need advocates like ECOSS that tackle problems in a supportive, person-to-person way and assemble the "puzzle pieces" one small step at a time – keeping the game moving. Such cooperative efforts found in the Brownfields program stand out as guiding lights to how the multidimensional problems in the Sound will be overcome.

And finally I hope you can find a way for the Action Agenda to express goals for improving the public's interaction with the shoreline. Such improvement will inevitably require enough water quality improvement and habitat restoration to convince the public to go to the water's edge more frequently for recreation.

References to Superfund Region X:

http://yosemite.epa.gov/R10/CLEANUP.NSF/sites/bf

http://www.epa.gov/brownfields/jt1205/tacoma_wa.htm

http://www.epa.gov/brownfields/partners/org_partnerships.htm

http://your.kingcounty.gov/solidwaste/brownfields/documents/Brownsfield_program.pdf

http://www.ecoss.org/brownfields.html

Thank you again for this opportunity to comment. It is a pleasure to be part of this process. I encourage you to take great pride in what you've accomplished with this document and to now take on the strong leadership role that is required to spur me and the greater Puget Sound community into action.

Mike Webb
South Sound chapter Chair
Surfrider Foundation

"For the Health of the Ocean"

PugetSoundPartnership
our sound, our community, our chance

From: Anne Weber

Comment: Dear Puget Sound Partnership,

Thank you for tackling the enormous challenge of saving Puget Sound head on. We appreciate your boldness and your efforts to engage the broader community, to listen to us and to base your decisions on science.

Surfrider Foundation is committed to supporting your efforts, primarily by encouraging people to get out in the watershed and into the Sound, to enjoy it, to appreciate it and to take action to protect and restore it. Through projects like Rise Above Plastics, beach clean ups and ocean friendly gardens, we will do our best to promote Sound stewardship practices.

In order to make sure that we reach our goal of a healthy Puget Sound by 2020, we ask that you strengthen the Action Agenda by incorporating the following recommendations:

- Be stronger on water quality measures by offering a comprehensive and robust program to prevent all sources of stormwater pollution and strengthening the list of actions for toxic pollution prevention.

- Develop different indicators for human well-being to include more opportunity for quality water-based recreation through increased shoreline access, clean beaches, and clean water.

- Be stronger on accountability by incorporating clear benchmarks to get us to a healthy Puget Sound by 2020.

- Create more opportunities and stronger protection programs to improve the public's interaction with the shoreline and achieve enough water quality improvement and habitat restoration to inspire the public to go to the water's edge more frequently.

- Ensure that there is enough funding for Puget Sound to achieve the goals laid out in this ambitious agenda.

PugetSoundPartnership
our sound, our community, our hands

From: Rose Wedlund

Comment: Dear Puget Sound Partnership,

Thank you for your commitment to developing an Action Agenda for a healthy Puget Sound. From struggling orcas to toxic chemicals in our water, the Sound needs quick and decisive action today. I want to make sure we pass a thriving Puget Sound on to future generations.

I urge the Partnership to incorporate accountability, benchmarks of success, and ample funding into this Agenda.

The draft Action Agenda includes many of the essential elements that need to be accomplished, but in addition, the final Action Agenda must also:

-Amend the Cruise Ship MOU to ban all cruise ship discharges in Puget Sound;

-Prioritize the protection and restoration of the State's forage fish spawning beds;

-Complete the Management Plan for the Cherry Point Aquatic Reserve;

-Identify adequate and sustained funding for Plan implementation;

-Update the guidance for open water dredge disposal of PCBs;

-Expand the indicator species to include forage fish abundance and harbor seal toxics loading; and

-Accelerate the restoration of the Elwha River.

Thank you for your hard work to develop a draft Action Agenda to restore, protect and recover Puget Sound to health by 2020.

On behalf of everything from eelgrass to orcas.

PugetSoundPartnership
our sound, our community, our chance

From: **Cheryse Wellman**

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On behalf of everything from eelgrass to orcas.

From: **Amber Wells**

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I am writing to urge you to improve your action agenda's recommendations on pollution prevention.

From: **Lynn Wells**

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From: **Deborah Welsh**

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Thank you for your hard work to develop a draft Action Agenda to restore, protect and recover Puget Sound to health by 2020.

On behalf of everything from eelgrass to orcas.

From: **Neva Welton**

Comment: Dear Puget Sound Partnership,

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The urgency of restoring the Sound to health is at a tipping point and missing orcas are the Sound's "canaries in the coal mine," telling us we are running out of time. But there is hope for the orca, as there was hope for the bald eagle, the California Condor and others on the verge of extinction. The Puget Sound Partnership's Action Agenda is a golden opportunity to do what has not been done for over 20 years- develop and implement a recovery plan that is accountable, effective, transparent and decisive with sustained funding to restore this national treasure to health by 2020.

The draft Action Agenda includes many of the essential elements that need to be done:

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-Fully fund a permanent year-round rescue tug at Neah Bay for oil spill prevention;

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BUT, more than a list of Soundwide and Action Area-specific actions, the Partnership must create a real 2020 Action Agenda, not just a 2-year plan, that clearly identifies the specific actions that are needed over the next 12 years and the HOW and WHO and BY WHEN each action must be

completed. All the actions need to be tied together into a comprehensive plan with measurable benchmarks and timelines in order to achieve recovery by 2020. The final Action Agenda must:

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-Set meaningful standards for habitat protection;

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-Expand the indicator species to include more than just salmon, i.e. forage fish, harbor seals, etc.

The Partnership staff, the Leadership Council, Ecosystem Coordinating Board, Science Panel and stakeholders throughout the Sound deserve praise for the monumental effort involved in producing the draft Action Agenda. The next step is secure much needed funding. The 2009 legislature must adopt new funding sources dedicated to the recovery of Puget Sound by 2020.

For Puget Sound!

From: **Shann Weston**

Comment: Under D.3.8: San Juan County sits in the center of a transboundary ecosystem. The orcas that make our county famous are affected by Fraser River salmon and the actions of Canadian citizens as well as the residents of Puget Sound. Efforts like the MRC Transboundary Initiative reflect this awareness, as does the language used by many local organizations, businesses and transboundary associations like the Whale Watch Operators Association.

We need a much stronger educational awareness of our transboundary ecosystem, call it the Salish Sea or the Puget Sound Georgia Basin Ecosystem, and we need the same title for it as our Canadian counterparts. San Juan County Beach Watchers, working with our local organizations here, would like to assist with this challenge.

What we need is support and a willingness from PSP to acknowledge the entire bioregion. During the last PSP meeting, Canada was grayed out in the slide that dealt with population growth of Puget Sound (using the political definition, which goes all the way to the Canadian border). This kind of thinking limits our real understanding of the ecosystem and the impacts of population and its effects (storm water, sewage, marine traffic) climate change and toxins, not to mention protection of our at risk transboundary species, notably orcas, salmon, and marine birds. This needs to be specifically addressed in slide shows, printed materials and public presentations.

The term Puget Sound can be still be used but all materials should also include information that reference the whole transboundary bioregion. In addition, this section needs to have specific actions spelled out, such as including a transboundary Management Action Task Force, funding and supporting frequent communications and cooperation on both sides of border, especially on the subjects of salmon and orca recovery, creating transboundary outreach and relationship building with similar Canadian organizations.

The tribes should also be included in this mix. Under the Priority San Juan Action Area Actions, we strongly support the removal of derelict gill nets. Beach Watchers can help in this effort by educating the public about this situation. It will take public money to actually remove the gill nets. And Beach Watchers were strongly involved regionally in the escape cord work.

E.4.8 #8 Implement the WSU Beach Watcher Sustainability Plan. Beach Watchers will take advantage of an established Extension model, and to coordinate with on the ground Extension programs, such as Master Gardeners and the many natural resources programs. The WSU Beach Watchers, using the time honored Extension Model, is one of the few that really develops ecological literacy, translating scientific information into digestible pieces for the average lay person, while also mobilizing year-round volunteers. A regional program with sustained funding will help deliver both a coordinated citizen science program and leverage the public dollar by utilizing volunteers to expand outreach about the challenges of Puget Sound/the Salish Sea.

Developing a PSP volunteer and outreach grant as stated in E.4 will effectively help existing efforts. All of the near term actions in E.4 are excellent. Funding is critical to support staff time to develop and distribute quality outreach materials.

San Juan Island Beach Watchers are working collaboratively with many other groups to accomplish the goals listed in the Priority Actions for our county. Our Stewardship Network, Stewardship newspaper insert and MRC Outreach Committees are examples of this strong cooperative approach. WSU Beach Watchers, together with Master Gardeners and the Agricultural Resources Council, assist in a number of county priorities, such as: the Marine Stewardship Area Plan, the MRC Monitoring Plan, The Orca Recovery Plan, LID, Stormwater Management, the San Juan Initiative, Shoreline Master Program update, the CAO and the Salmon Recovery Plan.

We are also very actively working with recreation and tourism groups. We support providing funding and support for implementation of the Marine Stewardship Area and the Critical Areas Ordinance.

The following suggestions are in support of the orca and salmon recovery plans:

The orca recovery plan must be linked to the salmon recovery plan (this is not the case currently).

Increase public outreach about salmon, with specific and prioritized action strategies to help in their recovery. The newly formed Salish Sea Marine Naturalist Association (under the Whale Museum) would be an excellent way to do this.

The Whale Watch Operators Association should be asked to develop specific educational plans, with links to the orca and salmon recovery plans for each company, each season. This would also give the consumer a better way to pick those who have a better emphasis on education.

Provide funding and support for Soundwatch.

Fund training and increase funding for enforcement of whale and harvest regulations.

From: **Julie Whitacre**

Comment: Dear Leadership Council,

Thank you for the opportunity to comment on the Puget Sound Partnership Draft Action Agenda. I appreciate the tremendous amount of work that has gone into developing it and I support the strong list of measures that, if implemented, will go a long way toward recovering Puget Sound by 2020.

The draft plan includes a few omissions. The final plan should include Outstanding Resource Water (ORW) designation under the Clean Water Act as a tool to help protect rivers and other aquatic habitat. While I strongly support the inclusion of Wild and Scenic designation as a similar tool, in some cases ORW designation will likely prove to be a better, more immediate way for the state to ensure the protection of high quality rivers and other waters. Therefore, I urge the Partnership to include support for the Outstanding Resource Water designation as one of its "Near Term Actions." ORW designations permanently protect high quality waters that are ecologically significant, provide cold water refuges for fish, and/or support important recreational values. Many rivers in the Puget Sound region are eligible for ORW designation. I would also like to encourage you to include funds to move up the removal of the two dams on the Elwha from 2012 to 2010. Removal of the Elwha dams is one of the best chances for salmon and steelhead recovery in the region as it will open up over 70 miles of prime spawning habitat. Removing these dams has also been as a key action to recover our Puget Sound's orca population, which is malnourished thanks to a lack of chinook salmon.

Especially during difficult financial times, finding opportunities for economic benefit and job creation is important. Removing the Elwha dams provides a tremendous opportunity for creating "green jobs" and numerous other economic benefits.

Thank you for taking my comments into consideration.

From: **AE White**

Comment: Dear Puget Sound Partnership,

2020 NOT TOO FAR OFF

Thank you for your hard work to develop a draft Action Agenda to restore, protect and recover Puget Sound to health by 2020. It could not come at a more pressing time, especially for the Sound's iconic and endangered orca whale. Just this month, researchers reported seven orcas "10% of the Puget Sound population" are missing and believed to be dead. Some experts say dwindling populations of endangered Chinook salmon are at least partly to blame. Is this a sign that our ecosystem is on the verge of collapsing?

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over 20 years- develop and implement a recovery plan that is accountable, effective, transparent and decisive with sustained funding to restore this national treasure to health by 2020.

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-Expand the indicator species to include more than just salmon, i.e. forage fish, harbor seals, etc.

The Partnership staff, the Leadership Council, Ecosystem Coordinating Board, Science Panel and stakeholders throughout the Sound deserve praise for the monumental effort involved in producing the draft Action Agenda. The next step is secure much needed funding. The 2009 legislature must adopt new funding sources dedicated to the recovery of Puget Sound by 2020.

For Puget Sound!

From: **Judith White-Crow**

Comment: I already receive info from the Partnership at my work e-mail address. I just wanted to say job well done and wish you luck getting the funding you need to continue your work. I fully support whatever legislative measures will be needed to make this work.

From: **Jennifer Whitney**

Comment: While one of the six goals established by The Legislature was c)"Healthy and sustaining populations of native species in Puget Sound, including a robust food web:" and one of the definitions of sucess is that "species are viable in a healthy ecosystem, meaning that they are abundant, diverse, and likely to persist into the future...." these goals do not carry through the rest of the document. There is not one priority action that mentions monitoring abundance of any species that could serve as an indicator of a robust food web and a healthy Puget Sound. Without monitoring how will you know if native populations are healthy and sustaining? The integrated ecosystem approach is commendable but the priority actions appear to be limited to habitat, pollution, and coordination issues and are missing the important component of species abundance monitoring.

From: **Karen Wible**

Comment: Dear Leadership Council,

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Especially during difficult financial times, finding opportunities for economic benefit and job creation is important. Removing the Elwha dams provides a tremendous opportunity for creating "green jobs"

and numerous other economic benefits.

Thank you for taking my comments into consideration.

From: **Den Mark Wichar**

Comment: Dear Puget Sound Partnership,

I urge you to improve your action agenda's recommendations on pollution prevention. Present conditions requires tightest standards possible. Convenience or cheapness is not the issue. Effectiveness is the issue.

From: **Den Mark Wichar**

Comment: Dear Puget Sound Partnership,

Thank you for your hard work to develop a draft Action Agenda to restore, protect and recover Puget Sound to health by 2020. It could not come at a more pressing time, especially for the Sound's iconic and endangered orca whale. Just this month, researchers reported seven orcas "10% of the Puget Sound population" are missing and believed to be dead. Some experts say dwindling populations of endangered Chinook salmon are at least partly to blame. Is this a sign that our ecosystem is on the verge of collapsing?

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For Puget Sound!

From: **Jane Wiebe**

Comment: Dear Puget Sound Partnership,

I am writing to urge you to improve your action agenda's recommendations on pollution prevention.

From: **Elaine Willey**

Comment: Dear Puget Sound Partnership,

I applaud Governor Gregoire and her team on this issue, but unless we address the enormous damage that pesticides cause to the Sound, we will miss a key component of toxicitiy to our water and sea life. Many pesticides are neuro toxic, endocrine disrupting (this is huge), sensitizers/irritants and many have been linked to cancer and Parkinson's in humans. When humans experience such far-reaching and growing damage related to pesticides, what do we think these toxins do to our Sound and sea life?

I live in a lovely Seattle neighborhood, and one pesticide applicator alone sprays 80 homes 4-6 times each, per year! Where do we think all of this drains to? Our water. See the Northwest Coalition (www.pesticide.org), or Beyond Pesticides (www.beyondpesticides.org) or the WA Toxics Coalition

(www.watoxics.org) for more information. Toxic products people buy at retail are also a huge factor. Please incorporate pesticide reduction and education in your plan.

Thank you to the Partnership staff, the Leadership Council, Ecosystem Coordinating Board, Science Panel and stakeholders throughout the Sound for doing the right thing on this issue. We know that when salmon have impairments in essential functioning, like sense of smell, basic biological functions are being affected, which greatly impact their survival. Let's connect the dots: pesticide reduction and education should be a key element of this plan for recovery of Puget Sound by 2020. That means a real 2020 Action Agenda addressing pesticides too.

Thank you for this opportunity to strengthen a strategy to save Puget Sound.

From: **Judy Willott**

Comment: Dear Puget Sound Partnership,

Yes we need all that in the message you wrote. We need policies, research, funding. But we also need all of us who live in the Greater Puget Sound area to hear about do-able steps each of us can take to clean up our Sound. We need beach owners to know what a healthy beach and healthy shoreline looks like. We need the big shellfish companies to subscribe to the health of each section of beach and shoreline. We need uplanders to know what can be done upland.

We need to move into an action phase from the endless study and plan stage, or at least add an action phase to the studying and planning.

From: **Sarah Wilson**

Comment: Dear Puget Sound Partnership,

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From: **Sheila Wilson**

Comment: Dear Puget Sound Partnership,

I am writing to urge you to improve your action agenda's recommendations on pollution prevention.

From: **Marian Wineman**

Comment: Dear Puget Sound Partnership,

I am writing to urge you to improve your action agenda's recommendations on pollution prevention to protect all marine life including both industrial reporting of all chemicals used and immediate replacement of pollutants that are toxic or could be toxic to marine life with non-toxic alternatives.

From: **Joel and Lucinda Wingard**

Comment: Dear Puget Sound Partnership,

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For Puget Sound!

From: **Sarah Winnett**

Comment: Dear Puget Sound Partnership,

The Partnership staff, the Leadership Council, Ecosystem Coordinating Board, Science Panel and stakeholders throughout the Sound deserve praise for the monumental effort involved in producing the draft Action Agenda. The next step is to finalize a plan that is accountable, transparent, effective and

have dedicated new funding sources to the recovery of Puget Sound by 2020.

The Partnership must create a real 2020 Action Agenda, not just a 2-year plan that clearly identifies the specific actions that are needed over the next 12 years and the HOW and WHO and BY WHEN each action must be completed. All the actions need to be tied together into a comprehensive whole through measurable benchmarks that must be accomplished in order to achieve recovery by 2020.

Thank you for this opportunity to strengthen a strategy to save Puget Sound.

From: **Michael Winter**

Comment: While I clearly find the goals of the agenda in alignment with my own desires, I find the lack of definitive science used in some of the conclusions and resultant responses to be problematic. As a waterfront homeowner I do not believe my individual rights are being properly considered in terms of some goals this agenda sets. I along with many of my neighbors who support environmental issues in general could easily be turned against these goals due to the unjustified taking of our property rights. I think those putting this agenda together should consider other ways to achieve the same goals than taking existing property rights. By suggesting processes that will make it too expensive or simply impossible to protect our existing property you are by default suggesting the taking of said property. I would expect an almost never ending stream of lawsuits over these issues if the current tact of take away private property owners rights using guesses, could be, I think maybe, or simply faulty science at best as the justification for it. I think we can achieve the real goal of a healthier sound environment without resorting to such drastic and costly measures. Keep the suggestions on what to implement to ones based on accepted, peer reviewed science which is appropriately applied and I along with many others would support them.

From: **Nancy Winters**

Comment: Dear Puget Sound Partnership,

I thank you for the opportunity to comment on the Draft Action Agenda that was released two weeks ago. I have a number of general concerns about the agenda and a couple of specific concerns that are described below.

As I understand the vision of the Legislature and the Governor, the purpose of the Partnership is to restore and protect Puget Sound by the year 2020. The Action Agenda as it is currently written will not even maintain the current condition of Puget Sound. While the plan does recognize the threats to the Sound, (such as population growth, our current favored mode of transportation, and the contribution of toxics by runoff) it does not present bold measures that would stop or slow the continued degradation of this precious resource.

To protect and restore the Sound will require a paradigm shift by the resident population. Paradigm shifts are not generally undertaken without mandates and timelines; and the Agenda does not mandate actions or hold agencies accountable for the changes needed. The Agenda does not mandate intensive watershed-based land use planning that could reduce the impacts of toxic runoff, reduce nutrient loading, and preserve habitat. The watershed based planning could build on the efforts of the 2514 plans, and the salmon recovery plans that are already in place but do not

consistently address water quality and stormwater contributions.

Roadways are a recognized contributor to toxics loading to the Sound. The Agenda could propose a major shift in our transportation paradigm. For many years, many of us have been mystified at the lack of investment in mass transit. This would require not only the funding for infrastructure, but also use of social marketing techniques to help re-shape the current paradigm of one person per car.

In the arena of stormwater, which the Partnership recognized as the leading contributor of toxic substances to the Sound, the Agenda does not require the Department of Ecology to strengthen their stormwater general permits. Instead it recommends that Ecology develop watershed-based permits -- a pathway that will require years to develop and subsequently litigate. The Partnership could instead mandate that Ecology establish a timeline for municipalities under the MS4 permits to meet the Water Quality Standards as the system meets the water body. It seems foolish to invest in stream restoration projects, when the toxics in waters and sediments will continue to either kill or weaken the immune systems of the fish we are trying to save.

The Agenda could also require the Phase I and II MS4 communities to retrofit existing stormwater infrastructure in a phased approach over, for example, 15 years to meet the hydrologic conditions that will support fish-bearing streams.

The Partnership could also mandate that Ecology strengthen the Industrial Stormwater General Permit to apply to more industries and to lower both the benchmarks (based on what has been demonstrated that industries have already achieved) and the thresholds for real implementation of source controls and treatment technologies.

The Action Agenda could mandate implementation of Low Impact Development for all Puget Sound communities. The PPCHB has already mandated use of LID where feasible for the Phase I MS4 communities. The Partnership could recommend that this be extended not only to the Phase 2 communities, but to all communities within the Puget Sound region. This would not only reduce toxics loading to the Sound but will restore the hydrology to some of our salmon-bearing streams. (Even in Beijing, all of the Olympic facilities were designed as low impact facilities.)

The Agenda could require that Ecology eliminate mixing zones in a phased approach for all wastewater dischargers. Eliminating the “need for mixing zones” by developing a program to manage pharmaceuticals and continuing a program to address PBTs one chemical at a time does demonstrate a recognition of the problems nor will these pathways that will restore let along protect the Sound.

The Agenda could require Ecology to update the Water Quality Standards for toxics (a process they are loath to undertake) to address the issue of bioaccumulation in species such as salmon and orcas based on research that has already been published.

For accountability, the Agenda could establish a timeline. While the Partnership is currently funding a study of nutrient removal in municipal sewage treatment plants, the Agenda does not propose that Ecology implement nutrient removal for all wastewater treatment plants by establishing a new bar (AKART) for nutrient removal. The wastewater technologies that continue to be applied to these plants are more than 30 years old. New technologies are available and can be implemented. However, they will not be implemented Sound-wide without a mandate. The Agenda does not, but could, propose a rigorous program of product substitution, with timelines and accountability.

The Partnership could look for efficiencies for remediation. For example, they could require Ecology to

assess all water quality parameters when they are conducting a TMDL. The current process, which is extremely time and resource intensive, evaluates only one or two parameters at a time. Currently, Ecology is not looking at a full suite of parameters because they may not have monitored for all parameters that could be violating water quality standards. Yet they will need to arduously drag communities through the process in multiple rounds, when they could (with additional funding) conduct one TMDL process for all potential parameters.

The Partnership could also consolidate functions that are currently dispersed among more than one agency. For example Ecology may be the granting authority for LID projects, but the Partnership holds the technical expertise. Coordination costs money. In this time where funding will be short, it makes more sense to consolidate these functions into one authority. This is also true in the arena of water-reuse, gray water, and on-site system. On a national level, there is much discussion of infrastructure funding, but traditional and "green." The Partnership's mandates in the Agenda could position the region to compete favorably for the "green" infrastructure funding that is currently being discussed before Congress. But the Agenda would need to be substantially strengthened to make such a demonstration.

The Agenda fails to lay out a strategy that will effectively protect the Sound from continued invasion by species not native here. While the federal efforts have languished, the Partnership could mandate NPDES permits for ballast water discharge. Treatment technologies are available that will reduce or eliminate the risks of release of invasive species. Prevention is always less expensive that remediation.

This comment letter identifies many ways in which the Agenda could be emboldened. However, to accomplish this, the Partnership would need to take a bold leadership role. Most of the recommendations outlined here will not be popular; and the Partnership cannot expect to have consensus on them. The Partnership needs to decide whether or not to lead the region and meet its mission to restore and protect Puget Sound. The draft Agenda will not achieve the mission, and will not even hold the line. Before spending the taxpayers' now limited dollars, the Partnership should be convinced that the Agenda will meet its mission.

From: **Kathy Wipperfurth**

Comment: Dear Puget Sound Partnership,

I am writing to urge you to improve your action agenda's recommendations on pollution prevention. I want a healthy Puget Sound to be part of the legacy we leave our children, as it was mine and still is.

Many Washington manufacturers continue to use harmful chemicals without any plans to switch to chemicals that are safer for Puget Sound. To protect public health and the environment, Washington's industry must begin phasing out of the worst toxic chemicals and developing plans to switch to safer alternatives.

Please include recommendations to help move Washington's businesses toward safer alternatives and away from chemicals known to be harmful to Puget Sound. These proposals should include:

Increasing the availability of technical assistance to help businesses reduce chemical use.

Developing a state program to focus on researching safer chemicals and materials.

Requiring better industry reporting to Ecology of the chemicals currently being used.

This is truely a same, especially when it can be prevented. I suppose it comes down to a money issue as it usually dose.

From: **Esther B Wolf**

Comment: Dear Puget Sound Partnership,

I am writing to urge you to improve your action agenda's recommendations on pollution prevention.

From: **Rebecca Wolfe**

Comment: Please add my attached comments to others on the PSP Action Plan.

Thank you for your dedication to rescuing and restoring the Puget Sound Watersheds and the Sound itself!

See Wolfe, Rebecca attachment.

PugetSoundPartnership
our sound, our community, our chance

November 10, 2008

Puget Sound Partnership
PO Box 40900
Olympia, WA 98504

Dear Members of the Puget Sound Partnership Task Force:

Thank you for the opportunity to comment on the draft action agenda--and thanks also for the impressive work that the Partnership has done in bringing attention to the devastation of Puget Sound and the actions required to restore this region's natural legacy. Ultimately our quality of life here in the Pacific Northwest results from the natural wonders all around us. To restore and protect Puget Sound is to protect our very way of life -- now and for generations to come.

We believe that the action agenda needs to take more of a "big picture" approach to rescuing and restoring Puget Sound, looking (as your introduction states) from the Cascade Crest all the way down to the Sound. Beginning with the most northerly watershed (the Nooksack Watershed) and reaching to all of the other watersheds in the affected region, we need to emphasize preservation of upstream habitat, as well as ways to mitigate pollutants, especially petroleum products, washing off all roads and into the Sound. The Sierra Club is engaged on all fronts: transportation, clean and green energy, wilderness protection, wildlife protection, water and salmon interests, and more.

The draft agenda often cites the need to protect intact ecosystems/processes (introduction, page 3, question #2; page 4, question #3; and page 1), but we believe it needs to go much further in stressing the need for permanent protection of the headwaters that reach Puget Sound. Only a passing reference as a bullet point is seen on page 5 of question 3, and other references to "watershed scale study."

The agenda should explicitly and repeatedly call for protecting the last remaining roadless areas (federal and state land) in the form of wilderness protection, wild and scenic protections, similar state level protections, or combinations of all of these.

The study accurately notes that protecting intact habitat is the most cost-effective means of accomplishing the goal of restoring Puget Sound. However, it does not clearly specify what "intact habitat" is. It fails to point out we can get the most for

our local, state, and federal tax dollars by designating roadless areas under the highest forms of protection (wilderness).

Furthermore, there should be an explicit call for removal of old, sediment-bleeding logging roads throughout the highly productive, low elevation forests across the region. This addresses both habitat and water quality. The agenda should call for converting some of the areas formerly logged (especially steep slopes, and at headwaters/riparian/watershed areas) to wilderness/highest forms of protection as well, as many of these areas are suitable and necessary for such high-level protection.

The study also stresses going after pollution at its source. One of the sources of our dirty Puget Sound is from erosion that begins upstream. The enormous amount of silt and pollutants that find their way from the Cascade Crest into our Sound can be stopped or greatly reduced if the PSP will support an action plan that gives much more weight to the ecosystems – ecosystems that support animal life (including human, but also include many forms of non-human life), birds, plants, healthy soils, fungi, reptiles, amphibians, and enormous amounts of aquatic species. Support for sound, science-based policy for the optimal conservation and management of newly arrived gray wolves in our state is one example of how far-reaching our protection of wilderness reaches. As we support natural predators such as wolves and grizzlies, we will find healthier forests, streams, rivers, and ultimately, a healthier Puget Sound.

Thanks again for the opportunity to comment and for all of your efforts at the Puget Sound Partnership.

Sincerely,

Rebecca Wolfe, Chair
Conservation Committee
Snohomish Group
Cascade Chapter

1124 Second Avenue S.
Edmonds, WA 98020
425-774-6546 (home)
425-750-4091 (cell)

From: **Rebecca Wolfe**

Comment: I urge you to add much more emphasis on the "PREVENTION" of the Action Plan. I will submit specifics in a separate e-mail attachment. I serve as the Conservation Chair of the Snohomish Group of the Cascade Chapter of the Sierra Club. I am aware of the absolute necessity to preserve and protect our watersheds -- all of the watersheds that feed the Puget Sound Basin. Your strong and active support for more "Wild & Scenic Rivers" and "Wilderness" protections are key to a healthy Puget Sound!

From: **Gordon Wood**

Comment: Dear Puget Sound Partnership,

The Partnership staff, the Leadership Council, Ecosystem Coordinating Board, Science Panel and stakeholders throughout the Sound deserve praise for the monumental effort involved in producing the draft Action Agenda. The next step is to finalize a plan that is accountable, transparent, effective and have dedicated new funding sources to the recovery of Puget Sound by 2020.

The Partnership must create a real 2020 Action Agenda, not just a 2-year plan that clearly identifies the specific actions that are needed over the next 12 years and the HOW and WHO and BY WHEN each action must be completed. All the actions need to be tied together into a comprehensive whole through measurable benchmarks that must be accomplished in order to achieve recovery by 2020.

Thank you for this opportunity to strengthen a strategy to save Puget Sound.

From: **Gordon Wood**

Comment: Dear Puget Sound Partnership,

I am writing to urge you to improve your action agenda's recommendations on pollution prevention.

From: **Gordon Wood**

Comment: Dear Puget Sound Partnership,

Thank you for your commitment to developing an Action Agenda for a healthy Puget Sound. From struggling orcas to toxic chemicals in our water, the Sound needs quick and decisive action today. I want to make sure we pass a thriving Puget Sound on to future generations.

I urge the Partnership to incorporate accountability, benchmarks of success, and ample funding into this Agenda.

The draft Action Agenda includes many of the essential elements that need to be accomplished, but in

addition, the final Action Agenda must also:

-Amend the Cruise Ship MOU to ban all cruise ship discharges in Puget Sound;

-Prioritize the protection and restoration of the State's forage fish spawning beds;

-Complete the Management Plan for the Cherry Point Aquatic Reserve;

-Identify adequate and sustained funding for Plan implementation;

-Update the guidance for open water dredge disposal of PCBs;

-Expand the indicator species to include forage fish abundance and harbor seal toxics loading; and

-Accelerate the restoration of the Elwha River.

Thank you for your hard work to develop a draft Action Agenda to restore, protect and recover Puget Sound to health by 2020.

On behalf of everything from eelgrass to orcas.

From: **Nathanael Wood**

Comment: Dear Puget Sound Partnership,

Thank you for your hard work to develop a draft Action Agenda to restore, protect and recover Puget Sound to health by 2020. It could not come at a more pressing time, especially for the Sound's iconic and endangered orca whale. Just this month, researchers reported seven orcas "10% of the Puget Sound population" are missing and believed to be dead. Some experts say dwindling populations of endangered Chinook salmon are at least partly to blame. Is this a sign that our ecosystem is on the verge of collapsing?

The urgency of restoring the Sound to health is at a tipping point and missing orcas are the Sound's "canaries in the coal mine," telling us we are running out of time. But there is hope for the orca, as there was hope for the bald eagle, the California Condor and others on the verge of extinction. The Puget Sound Partnership's Action Agenda is a golden opportunity to do what has not been done for over 20 years- develop and implement a recovery plan that is accountable, effective, transparent and decisive with sustained funding to restore this national treasure to health by 2020.

The draft Action Agenda includes many of the essential elements that need to be done:

-Require low-impact development to reduce stormwater pollution;

-Prohibit new bulkheads near feeder bluffs and forage fish spawning beaches;

-Fund local governments to develop and carry out shoreline master programs;

-Fund enforcement staff at state agencies and local governments;

-Implement specific, aggressive cleanup plans for polluted waters, including TMDLs;

-Fully fund a permanent year-round rescue tug at Neah Bay for oil spill prevention;

-Acquire critical intact parcels for habitat protection and conservation;

-Set strong requirements for water quantity, such as setting in-stream flow for all major rivers.

BUT, more than a list of Soundwide and Action Area-specific actions, the Partnership must create a real 2020 Action Agenda, not just a 2-year plan, that clearly identifies the specific actions that are needed over the next 12 years and the HOW and WHO and BY WHEN each action must be completed. All the actions need to be tied together into a comprehensive plan with measurable benchmarks and timelines in order to achieve recovery by 2020. The final Action Agenda must:

-Clearly identify timelines and responsibilities;

-Identify adequate and sustained funding for the long haul;

-Be a visionary and long term plan;

-Be based on science;

-Offer a comprehensive and robust program to prevent all sources of stormwater pollution, not just municipal stormwater;

-Strengthen the list of actions for toxic pollution prevention;

-Set meaningful standards for habitat protection;

-Balance regulatory change with land acquisition to accomplish long term recovery goals;

-Expand the indicator species to include more than just salmon, i.e. forage fish, harbor seals, etc.

The Partnership staff, the Leadership Council, Ecosystem Coordinating Board, Science Panel and stakeholders throughout the Sound deserve praise for the monumental effort involved in producing the draft Action Agenda. The next step is secure much needed funding. The 2009 legislature must adopt new funding sources dedicated to the recovery of Puget Sound by 2020.

For Puget Sound!

From: **Deborah Woodland**

Comment: Dear Puget Sound Partnership,

I am writing to urge you to improve your action agenda's recommendations on pollution prevention.

From: **Bill Wright**

Comment: Dear Puget Sound Partnership,

The Partnership staff, the Leadership Council, Ecosystem Coordinating Board, Science Panel and

stakeholders throughout the Sound deserve praise for the monumental effort involved in producing the draft Action Agenda. The next step is to finalize a plan that is accountable, transparent, effective and have dedicated new funding sources to the recovery of Puget Sound by 2020.

The Partnership must create a real 2020 Action Agenda, not just a 2-year plan that clearly identifies the specific actions that are needed over the next 12 years and the HOW and WHO and BY WHEN each action must be completed. All the actions need to be tied together into a comprehensive whole through measurable benchmarks that must be accomplished in order to achieve recovery by 2020.

Thank you for this opportunity to strengthen a strategy to save Puget Sound.

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LESSONS FOR PUGET SOUND FROM THE UPPER SAN FRANCISCO ESTUARY

The excerpts to follow are from the report: Sommer, T., and 13 co-authors. 2007. The collapse of pelagic fishes in the Upper San Francisco Estuary. *Fisheries* 32(6):270-277.

Page 271: "However, an apparent recent change toward exceptionally low abundance indices for pelagic fishes caused great concern among California's resource managers, who had invested hundreds of millions of dollars in habitat restoration and environmental water for the upper San Francisco Estuary over the past decade."

Page 272: "In the likely event that the quagga mussel invades the upper San Francisco estuary, it could have effects similar to zebra mussels (*Dreissena polymorpha*), a close relative that has severely degraded other regions of the United States (Strayer et al. 1999)."

Page 272: "The Interagency Ecological Program (IEP), a consortium of nine state and federal agencies, has been monitoring fish populations in the San Francisco Estuary for decades, and has developed one of the longest and most comprehensive data records on estuarine fishes in the world."

Page 273: "As some of the leading scientists in the IEP, we became concerned when fall midwater trawl abundance indices for these four pelagic fishes began to decline around 2000 (Figure 4). The situation deteriorated over the next several years."

Page 274: "The introduction of the overbite clam (*Corbula amurensis*) in 1986 and associated changes in the food web reduced the magnitude of the response in longfin smelt without altering its slope (Kimmerer 2002b). Specifically, the grazing effects from *Corbula* are thought to have resulted in a substantial decline in phytoplankton and calanoid copepods, the primary prey of early life history stages of pelagic fishes."

Page 274: "The situation is similar for young-of-the-year striped bass, whose historical association with outflow was also altered by *Corbula*, and apparently again during the POD years, when abundance indices were well below the original relationship with outflow. Hence, it appears that the response of these pelagic fishes to environmental conditions has fundamentally changed."

Page 274: "To help the status of delta smelt and other native fishes, the CALFED effort invested $335 million in over 300 habitat restoration projects through 2002, and developed a large allocation of water for use by fisheries agencies, the Environmental Water Account (CALFED 2003)."

Page 276: "The last model component, bottom-up effects, also has received substantial attention in the estuary as a consequence of the extreme level of species introductions, resulting in major changes in the pelagic food web (Cohen and Carlton 1998). Phytoplankton biomass (as indexed by chlorophyll *a*) has declined over the last 4 decades, and species composition has shifted, with a sharp decline in diatom abundance and production in Suisun Bay and the western delta (Lehman 2002; Jassby et al. 2002; Kimmerer 2005). Key groups of zooplankton have likewise declined in abundance and biomass, with sharpest changes among calanoid copepods, a primary prey for the early life stages of pelagic fishes (Kimmerer and Orst 1996; Kimmerer 2006)."

Page 276: "Fortunately, the San Francisco Estuary has an exceptionally long and detailed history of environmental monitoring. The collapse required an integrated research program to analyze the problem. Analysis of the historical data, coupled with an intensive program of sharply focused studies, has permitted the rapid development of a better understanding of factors that have affected fish abundance in both the short and long term. This multi-faceted approach should greatly assist in planning for aquatic resource protection from increasing human demands and other stressors such as global warming and the imminent invasion by quagga mussels."

Implications for Puget Sound Situation

It seems obvious that Puget Sound does not have the types of long term monitoring programs (existing or planned) that are needed to either identify potential problems or measure their rate and degree of resolution. It appears that the important issues involved will become endless debates with no resolution into the foreseeable future. As noted in the Article, the problems will not be automatically solved by an infusion of hundreds of millions of dollars in expenditures. The most important deficiency in Puget Sound is probably the monitoring of long term changes in both the abundance and species composition of phytoplankton and zooplankton. In the late 1970s, a one-time sampling program detected a sharp decline in south Puget Sound zooplankton abundance after the massive spring release of hatchery fish. However, the problem has been ignored for the past three decades. Another troubling aspect is that no one acknowledges any possible parallels between overbite clams or zebra mussels and the huge recent increase in shellfish aquaculture in Puget Sound (introduced Pacific oysters, mussels and geoducks). However, all have the common ground of being a large biomass of filter-feeding organisms. The relatively recent cultural expansions into mussels and then geoducks, plus the recent expansion of oyster culture, should all have been preceded by separate Environmental Impact Statements. This is what is required by the State Environmental Policy Act. The basic productivity of Puget Sound marine waters needs to be recognized as a legitimate public resource that needs to be actively managed, including limitations on its access. The State recognizes the substrate of Puget Sound as being public land and controls its use and access. The State also recognizes waste discharge as something that needs to be carefully limited and monitored. It is time for the State to start managing diatoms with the same diligence. Sam Wright, 2007.

ADDENDUM - 2008

The following narrative appeared on page 110 of the November 2007 issue of *National Geographic*: "Tiny creatures near the base of the food chain lead perilous lives at best. Now they face a man-made threat. No, not global warming this time, though the root cause is the same. As the level of atmospheric carbon dioxide (CO_2) rises, it is not only heating the globe but also dissolving in ocean waters, turning them more acidic. For shell-building animals, that can mean a corrosive, even deadly environment."

From: **Charles Wurster**

Comment: Dear Puget Sound Partnership,

Thank you for your commitment to developing an Action Agenda for a healthy Puget Sound. From struggling orcas to toxic chemicals in our water, the Sound needs quick and decisive action today. I want to make sure we pass a thriving Puget Sound on to future generations.

I urge the Partnership to incorporate accountability, benchmarks of success, and ample funding into this Agenda.

The draft Action Agenda includes many of the essential elements that need to be accomplished, but in addition, the final Action Agenda must also:

-Amend the Cruise Ship MOU to ban all cruise ship discharges in Puget Sound;

-Prioritize the protection and restoration of the State's forage fish spawning beds;

-Complete the Management Plan for the Cherry Point Aquatic Reserve;

-Identify adequate and sustained funding for Plan implementation;

-Update the guidance for open water dredge disposal of PCBs;

-Expand the indicator species to include forage fish abundance and harbor seal toxics loading; and

-Accelerate the restoration of the Elwha River.

Thank you for your hard work to develop a draft Action Agenda to restore, protect and recover Puget Sound to health by 2020.

On behalf of everything from eelgrass to orcas.

From: **Donna Yancy**

Comment: Dear Puget Sound Partnership,

I am writing to urge you to improve your action agenda's recommendations on pollution prevention.

I am very concerned for our orcas. We need to discover the reason for this and problem solve this urgent situation.

From: **A.T. Young**

Comment: Dear Puget Sound Partnership,

I am writing to urge you to improve your action agenda's recommendations on pollution prevention.

Orcas are just one of the creatures suffering for our lack of a definite precautionary approach to environmental toxins. Where safer alternatives are known to exist we need to nudge industry and individuals to use them. Providing guidance, guidelines and information on alternatives that are less harmful to Puget Sound is a good start. Toughening laws and requiring a precautionary approach might save us all from harmful toxins.

From: **Angeline Zalben**

Comment: Dear Puget Sound Partnership,

The Partnership staff, the Leadership Council, Ecosystem Coordinating Board, Science Panel and stakeholders throughout the Sound deserve praise for the monumental effort involved in producing the draft Action Agenda. The next step is to finalize a plan that is accountable, transparent, effective and have dedicated new funding sources to the recovery of Puget Sound by 2020.

The Partnership must create a real 2020 Action Agenda, not just a 2-year plan that clearly identifies the specific actions that are needed over the next 12 years and the HOW and WHO and BY WHEN each action must be completed. All the actions need to be tied together into a comprehensive whole through measurable benchmarks that must be accomplished in order to achieve recovery by 2020.

Thank you for this opportunity to strengthen a strategy to save Puget Sound.

From: **Heidi Zamzow**

Comment: Dear Puget Sound Partnership,

I am writing to urge you to improve your action agenda's recommendations on pollution prevention. We have recently lost 10% of our orca population - and it's likely to get worse. We need to protect this area's greatest natural resource and economic stronghold - the Puget Sound - with stronger environmental protections, such as those recommended by the Washington Toxics Coalition.

From: **Scott Zema**

Comment: I do not understand why people are still allowed to wash their cars or hold 'Car Washes' without mandatory requirements that they wash their cars in areas that catch waste water for proper processing! On good days on the weekends I see many car wash events which MUST do nothing but dump tens of thousands of gallons of untreated deadly waste water into the storm system. NOW I UNDERSTAND that there is a Tim Eyman-George Bush-Doug Sutherland era 'Voluntary' package available to interested (and informed) citizens to help 'address' the pollution problem, But this is not enough!! Let's start writing tickets on this one to scofflaws!!

From: **Barbara Zimmer**

Comment: Dear Puget Sound Partnership,

The Partnership staff, the Leadership Council, Ecosystem Coordinating Board, Science Panel and stakeholders throughout the Sound deserve praise for the monumental effort involved in producing the draft Action Agenda. The next step is to finalize a plan that is accountable, transparent, effective and have dedicated new funding sources to the recovery of Puget Sound by 2020.

The Partnership must create a real 2020 Action Agenda, not just a 2-year plan that clearly identifies the specific actions that are needed over the next 12 years and the HOW and WHO and BY WHEN each action must be completed. All the actions need to be tied together into a comprehensive whole through measurable benchmarks that must be accomplished in order to achieve recovery by 2020.

Thank you for this opportunity to strengthen a strategy to save Puget Sound.

From: **Jon Zurit**

Comment: Dear Puget Sound Partnership,

I am writing to urge you to improve your action agenda's recommendations on pollution prevention. I want a healthy Puget Sound to be part of the legacy we leave our children.

Many Washington manufacturers continue to use harmful chemicals without any plans to switch to chemicals that are safer for Puget Sound. To protect public health and the environment, Washington's industry must begin phasing out of the worst toxic chemicals and developing plans to switch to safer alternatives.

Please include recommendations to help move Washington's businesses toward safer alternatives and away from chemicals known to be harmful to Puget Sound. These proposals should include:

-Increasing the availability of technical assistance to help businesses reduce chemical use.

-Developing a state program to focus on researching safer chemicals and materials.

-Requiring better industry reporting to Ecology of the chemicals currently being used.

From: **Megan Zusne**

Comment: Dear Leadership Council,

Thank you for the opportunity to comment on the Puget Sound Partnership Draft Action Agenda. I appreciate the tremendous amount of work that has gone into developing it and I support the strong list of measures that, if implemented, will go a long way toward recovering Puget Sound by 2020.

The draft plan includes a few omissions. The final plan should include Outstanding Resource Water (ORW) designation under the Clean Water Act as a tool to help protect rivers and other aquatic habitat. While I strongly support the inclusion of Wild and Scenic designation as a similar tool, in some cases ORW designation will likely prove to be a better, more immediate way for the state to ensure the protection of high quality rivers and other waters. Therefore, I urge the Partnership to include

support for the Outstanding Resource Water designation as one of its "Near Term Actions." ORW designations permanently protect high quality waters that are ecologically significant, provide cold water refuges for fish, and/or support important recreational values. Many rivers in the Puget Sound region are eligible for ORW designation. I would also like to encourage you to include funds to move up the removal of the two dams on the Elwha from 2012 to 2010. Removal of the Elwha dams is one of the best chances for salmon and steelhead recovery in the region as it will open up over 70 miles of prime spawning habitat. Removing these dams has also been as a key action to recover our Puget Sound's orca population, which is malnourished thanks to a lack of chinook salmon.

Especially during difficult financial times, finding opportunities for economic benefit and job creation is important. Removing the Elwha dams provides a tremendous opportunity for creating "green jobs" and numerous other economic benefits.

Thank you for taking my comments into consideration.

PugetSoundPartnership
our sound, our community, our chance

Hi PSP Folks!

I'm sure you are aware of the on-going problems with the untreated sewage being discharged by Victoria areas' CRD (Capital Regional District).. but wasn't so sure you were aware of the scale. Below is a note I just sent to a number of the candidates running for city council (Elections are on Nov. 15th!) in the Greater Victoria area that speaks to some specifics I think you will find relevant to your efforts. I think you might consider emailing the various candidates to emphasize your concerns about the regional impacts of the discharges from the outfalls. Here are Google search results that have the names and email addresses for the candidates for both Mayor, and Council of the cities directly involved in the decisions to support the construction of treatment facilities:

City of Victoria:

[PDF]

DECLARATION OF CANDIDATES FOR THE 2008 CIVIC ELECTION GENERAL ...

File Format: PDF/Adobe Acrobat - View as HTML
persons as **candidates** for the City of **Victoria 2008** Civic Election to be held Saturday, **... Declaration** of **Candidates**. **2008** Civic Election **...**
www.**victoria**.ca/cityhall/pdfs/crpleg_abt_dclrd_081016c.pdf - Similar pages

City of Esquimalt:

http://www.esquimalt.ca/files/PDF/Municipal_Hall/Election/Declaration_of_Candidates.pdf

There are 11 other cities that are voting members on the CRD Board, that make the decisions regarding the sewage collection system, storm water, and other related issues. I can provide names and contact for those candidates, if you are interested. Let me know, and I'll put together a document for you.

I hope you can find the time to help with this important aspect that directly, negatively impacts the health of the Sound and the Strait.

Thanks,

Tyler

.....

Am looking at the candidates seeking seats on the city council, and am impressed with your concern for community, and the environment. In reading your thoughts about the sewage treatment issues, I thought I would send along some relevant "facts" for your consideration. I know, it is a very complex and controversial issue, mostly because of the misperceptions about the issues, options and the costs involved. As someone who has been involved for more than a few years, I offer the following.

As you know, there are hundreds of thousands of people hooked up to the CRD sewage system, that dumps all of these chemicals and toxics into the Strait with no treatment at all.. How many, exactly? According to the CRD..

As of 2005, Clover Point serviced 165,000 person equivalents and Macula 163,000. source: **Discussion Paper No. 1, Core Area and West Shore Sewage Treatment Decision Information Paper – Design Criteria pg. 3**

This means the **human waste from over 328,000 people is discharged untreated everyday**! That is a very significant number!

But, most of the public does not think about what else goes down their drains. Paint your kids' bedroom, and wash the brushes, trays, etc.. down the drain it goes. Bleach your clothes, or toilet.. and down the drain it goes. Walk down the aisles of any of the grocery and supermarkets, and look at all rows and rows of the cleaning products. Soaps, detergents, fabric softeners, sanitizers, disinfectants, deodorizers and more.. And then, the rows of personal care products such as perfumes, shampoos, hair dyes, deodorants, toothpaste, mouthwash and much more.

" One large class of chemicals receiving comparatively little attention comprises the pharmaceuticals and active ingredients in personal care products (Pips), which are used in large amounts throughout the world; quantities of many are on par with agrochemicals. Escalating introduction to the marketplace of new pharmaceuticals is adding exponentially to the already large array of chemical classes, each with distinct modes of biochemical action, many of which are poorly understood."

The authors went on to write that exposure to PPCPs, especially for aquatic organisms, may be more chronic than exposure to pesticides and other industrial chemicals "because PPCPS are constantly infused into the environment wherever humans live or visit." Christian Daughton. Chief of the environmental chemistry branch of the EPA's Environmental Sciences Division."

Did you know : " After intake pharmaceuticals are excreted with urine and feces either as active substances or metabolites... it can tentatively be estimated 70% of the compounds are excreted in the urine and around 30% in the feces. "

(Source: Human Pharmaceuticals, Hormones And Fragrances By Thomas A. Ternes, Adriano Joss")

.. and:

"

- There are many drug classes of concern:

  - antibiotics which are actively being researched
  - antimicrobials
  - estrogenic steroids
  - antidepressants. Profound effects on spawning and other behaviors in shellfish can occur with antidepressant selective serotonin reuptake inhibitors (SSRIs).
  - calcium-channel blockers. Dramatic inhibition of sperm activity in certain aquatic organisms can be effected by calcium-channel blockers.
  - antiepileptic drugs (e.g., phenytoin, valproate, carbamazepine) have potential as human neuroteratogens, triggering extensive apoptosis in the developing brain, leading to neurodegeneration.
  - multi-drug transporters (efflux pumps). Possible significance of efflux pump inhibitors (EPIs) in compromising aquatic health.
  - musk fragrances are bioaccumulative and persistent
  - genotoxic drugs (primarily used at hospitals)

www.epa.gov/ppcp/faq.html

.. And.. that **sewage treatment facilities will remove more than 96% of these chemicals** ? That " **doing nothing removes nothing**"... and continues the flood of toxics that we are pouring down our drains, and into the Strait. That **"source control" will not be an effective solution** for the hundreds of housecleaning, personal care products and pharmaceuticals all those people are using, every day.

(Here are a couple references on "removal of EDCs and PPCPs".):

" In addition to nutrients such as nitrogen and phosphorus, microconstituents have gained national attention. These compounds include pharmaceuticals and personal care products and endocrine-disrupting chemicals. A study by the Water Environment Research Foundation (WERF) found that to a fairly significant extent, these compounds are being removed through conventional wastewater treatment processes. However, membrane systems usually have greater removal performances as a result of increased solids capture and long solids retention times (SRT) inherent in the membrane bioreactor (MBR) process."

http://ww.pennnet.com/display_article/322061/141/ARTCL/none/none/1/Membrane-Basics-for-Wastewater-Treatment/

....
" greater than 85% removal by conventional treatment plant.. " of Endocrine Disrupting Chemicals..
".. MBR removed greater than 96%..."
http://article.pubs.nrc-cnrc.gc.ca/ppv/RPViewDoc?_handler_=HandleInitialGet&journal=jees&volume=6&calyLang=fra&articleFile=s06-049.pdf

You probably know that "MBR" references membrane systems such as those pioneered by Canadian company Zenon, and now are widely employed. CRDs Dwayne Kalynchuk used to work for them.. and one of Zenons' first MBRs was installed on Salt Spring Island, for their treatment facility!

But, will treatment facilities for Victoria really cost $1.2 billion? Where did that number come from?

As you know, the Province mandated Victoria pursue sewage treatment facilities in a letter sent a few years ago, and the CRD set about complying with that directive. As the Directors will now tell you, the initial estimates were based upon concepts and technologies that are not now being seriously considered. But within those initial explorations, the highest number of those contemplated was $1.2 billion, and the opponents to treatment seized upon that number and use it whenever/wherever possible. Since the news media relies heavily on dispute and conflict as a source of community "news", this number has gotten wide circulation.

The CRD commissioned a study of " Integrated Resource Management" last year in their goals to better understand how resources such as water, energy, heat and cooling can be recovered from the wastes now discharged. The report (plus peer review questions) can be found at http://www.cd.gov.bc.ca/ministry/whatsnew/irm.htm. The concept of IRM, which integrates the management of organic and landfill directed wastes, along with the water, solids and heat that comprises sewage, is something I'm quite confident you will support in my reading of your other issues and concerns for Esquimalt. You may wish to contact Mayor Chris Clement, and/or View Royal Mayor Graham Hill for their views on waste and integration. I think you will find their comments encouraging!

The report found that waste treatment facilities can be constructed so as to **generate revenue** for Victoria's residents and taxpayers, instead of costing them to operate. This is the direction currently being pursued by the CRD Directors.

It is a VERY different picture than one sees in the everyday discussions in the media. We have an exciting opportunity to support the area in the creation of a management system that will be both environmentally responsible, AND that creates resources from our wastes.

I hope the above is helpful to you. Please feel free to contact me if you feel I can be of any help to you..

Best wishes,

Tyler

PugetSoundPartnership
our sound, our community, our chance