

# PugetSoundPartnership

our sound, our community, our chance

Draft Action Agenda Comments

*Other Government or Special District*

Nov. 6 - 20, 2008

Set 6 of 8



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**King Conservation District**

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November 20, 2008

Mr. David Dicks and the PSP Leadership Council  
Puget Sound Partnership  
P.O. Box 40900  
Olympia, Washington, 98504-0900  
Email: [actionagenda@psp.wa.gov](mailto:actionagenda@psp.wa.gov)

Dear Mr. Dicks and Council Members:

I want to begin by saying congratulations for the accomplishment of an important milestone along the path to Puget Sound recovery.

In this Draft Action Agenda, the Puget Sound Partnership (“PSP”) has managed to take advantage of existing relevant information, expertise, and ongoing efforts which serve as a solid foundation for the PSP strategy. The PSP’s commitment to on-going accountability through adaptive management and monitoring, its collaborative approach, and its resolve to move quickly are all reasons to be confident of success.

The efforts taken by the PSP to-date have taken the directive to protect and enhance Puget Sound’s natural resources, economy, and quality of life to the next level. The key elements to success are present: an agenda that is comprehensive, coordinated, integrated, adaptable, accountable, and most importantly, one that contemplates the involvement of the private sector as part of the solution.

The mission and mandate of the King Conservation District (King CD) echoes the Action Agenda’s “Call to Action”; which is based on the principle that the primary responsibility for stewardship of the land and its resources lies first with landowners. For nearly six decades, the King CD, like other conservation districts around the State of Washington, have worked with private landowners on a voluntary basis to provide the resources and encouragement to implement conservation best management practices for private, working lands.

The Science Work Plan addresses several key issues: 1) science must be approached in the context of an altered built environment that will be constantly growing and changing. The recognition that human and economic health are primary considerations when looking for solutions to natural resource protection and enhancement is a key step to engaging the private sector; 2) integrated and sustained system wide monitoring and management and applied research is essential and 3) independent, transparent and accountable scrutiny is required to maintain public support and confidence in the proposed solutions.

The regular, independently peer reviewed best available science through the Natural Resources Conservation Service is a resource that may readily integrate with the ongoing work of the Science Panel.

The King CD, like other conservation districts, is dedicated to education, training, and outreach to private citizens with the goal of engaging them as stewards of land and water. As only part of the services provided by conservation district, the task of reaching out to citizens to engage them as stewards working towards a sustainable healthy Puget Sound makes conservation districts outstanding partners in this effort. The rapport that conservation districts have as voluntary, non-regulatory agents of change, as well as the approach of the conservation districts to work as cooperators with landowners puts the Districts in a uniquely qualified position to make a substantial impact in Puget Sound recovery. As you may know, many of the suggested “citizen actions” are incorporated today in the on-going District work plans.

We at KCD look forward to working with PSP in the months ahead to align our efforts and respective mandates to best ensure a healthy Puget Sound region in the years to come.

Sincerely,



Jeffrey Possinger  
Executive Director  
King Conservation District

**From:** Bob McChesney, Port of Port Angeles

**Comment:** On behalf of the Port of Port Angeles, the City of Port Angeles, and Port Angeles Harborworks PDA we wish to comment on the Draft Action Plan as follows.

On PSP PA Harbor Management Resource plan, there's apparently still some disagreement on what the draft Action Plan says. Refer to Question-3/Page-17, B.2 Near-term Actions:

1. Fund a one year pilot program to develop a coordinated clean up and restoration plan for the Port Angeles harbor and waterfront. Implement the plan upon completion.

I'm not sure if this accurately expresses a consensus desire of the stakeholders. Indeed, it seems to co-opt the PA Harborworks PDA in ways that will likely compromise its effectiveness. Since the PSP priority action plan is still in draft form and public review/comment period, the Port, City and Harborworks PDA strongly objects to this element of the PSP priority action plan. It should be revised to conform to what we have already discussed in our meetings, and this work should be specifically assigned to PA Harborworks. Indeed, this has been the intent of the parties since before Harborworks PDA was formed, and supported by DOE, DNR and the Governor's Office. We also have some concerns about the specific wording in the Plan "Priority Action Area Strategies" item B. Restore Ecosystem Processes functions and Structures; last bullet "Clean up and restore the Port Angeles Harbor and waterfront through the harbor planning process". This should be tied directly to the Harborworks PDA, and maybe the City as lead agency.

Thank you for the opportunity to comment.

November 20, 2008

Mr. David Dicks  
Executive Director  
Puget Sound Partnership  
P.O. Box 40900  
Olympia, WA 98504-0900  
[david.dicks@psp.wa.gov](mailto:david.dicks@psp.wa.gov)

Dear Mr. Dicks:

The Port of Seattle appreciates the opportunity to comment on the Puget Sound Partnership's (PSP) draft Action Agenda. We would also like to congratulate the Puget Sound Partnership for pulling together this ambitious draft Action Agenda. We recognize the many hours of work and outreach that culminated in the draft. Puget Sound is a national treasure and a clean, healthy and vibrant Puget Sound is vital to our community, our health, our environment and our economy.

The Port of Seattle sees itself as a key partner and important implementer of many actions listed in the draft Action Agenda. The Port has established the goal of being the cleanest, greenest, most energy efficient port in the country and has already made considerable progress toward this goal. The Port has restored more habitat on the Duwamish River than all other public agencies combined. We have just published a draft habitat plan that will allow for significantly more habitat to be built in the Duwamish. We have formed a partnership with Port of Tacoma and Port Metro Vancouver (B.C.) to reduce emissions from maritime trade and tourism. We are working with our tenants in various ways to help each of them be as green as they can be.

**Water-Dependent Uses:**

The draft Action Agenda discusses protecting rural lands and aquaculture, but never mentions prioritizing water-dependent uses, such as ports and existing marine industrial uses and activities. The Port continues to engage public and private stakeholders who are dependent on waterways that are governed by multiple jurisdictional authorities. Ports, marine cargo, and other maritime industrial uses are a critical part of our regional economy and can only be located along the water. The Action Agenda should place a priority on sustaining these diverse uses of our shoreline regions.

### **Green Ports:**

The draft Action Agenda also includes a proposal to “expand and fund green port and clean marina programs to foster environmental stewardship for port and marina development and management.” The Port applauds this goal and looks forward to working alongside the Puget Sound Partnership in developing an initiative that can focus the efforts of all Puget Sound ports in restoring the health of the Sound and the river deltas on which many of the ports operate

### **Habitat Protection:**

We support the draft Action Agenda’s habitat protection policies that consider the context of the environment on and around project sites relative to the entire watershed ecology. We urge you to include language that clearly directs shoreline designations, no net loss polices and other regulations to address conservation priorities in the broader watershed, rather than to aggressively seek high levels of protection for marginal habitat.

### **Habitat Restoration:**

The draft Action Agenda emphasizes the need for coherent, coordinated, watershed-scale decision-making regarding mitigation project planning to compensate for new development and supports the development and piloting of market-based techniques and other innovative, compensatory mitigation tools as alternatives to traditional mitigation approaches (banks, in-lieu fee arrangements, water quality trading). The Port supports these recommendations, as they provide more mitigation tools and options to help us use resources for restoration and mitigation in ways that maximize their effectiveness.

### **Water Quality:**

In several places, the draft Action Agenda proposes “No-Discharge Zones” and seems to debate whether these zones should encompass the entire Puget Sound or focus on areas that “are nutrient-limited, have high vessel use and have significant shell fish production”. The Port strongly urges the latter approach. Designating the entire Sound as a no-discharge zone would have significant adverse economic impacts while not adding significant positive environmental benefits over the more targeted approach. Vessels transiting through Puget Sound have much less impact than discharges from municipal facilities or from un-maintained septic systems.

We urge the Puget Sound Partnership to prioritize funding for implementation and enforcement of current regulations. This is a critical step to improve stormwater management in urban and industrial areas. At this point, neither the Department of Ecology nor local governments with delegated responsibilities for NPDES implementation and enforcement have the resources to effectively implement and enforce NPDES requirements. Fully funding NPDES permits and enforcement would be the most cost-effective use of limited funds with the potential for real improvements in stormwater management and water quality conditions. Furthermore, implementation of existing regulation along with incentives to comply would greatly improve the compliance rate of existing and future permits.

Finally, this letter will be accompanied by more technical comments prepared by our staff.

We are pleased to submit our comments and to help in any way we can to perfect this draft Action Agenda. We look forward to partnering with the Puget Sound Partnership as it moves forward with implanting this landmark Action Agenda.

Sincerely,



Jay Yoshitani  
CEO  
Port of Seattle

Cc: POS Commission  
Stephanie Jones Stebbins

Puget Sound Partnership  
our sound, our community, our chance

**From:** Phil Best, Port of Silverdale

**Comment:** On behalf of the Port of Silverdale (in consultation with other ports) we submit one commissioner's comment: "The Draft contains a lot of items to address the small sources like oil drips from cars and animal waste, but I can't find anything directed at the big polluters like the City of Bremerton's dumping of 10's of thousands of gallons of untreated waste into Dyes Inlet on a regular basis. Looks like a penny wise versus dollar foolish approach." In the draft, this major source of pollution is only marginally referenced in Priority C: Reduce the Sources of Water Pollution / Action C.3 Prioritize and complete upgrades to wastewater treatment facilities to reduce pollutant loading / C.3.1 Implement priority upgrades of wastewater facilities. It should be given a higher priority and emphasize strong enforcement of already required corrections. This can produce more results for less money than many other actions given higher priority in the draft and have a real effect on pollution cleanup in the near term. This comment is probably also applicable to numerous other municipal sewage treatment systems that need upgrading, but whose failures regularly cause bodies of water like Dyes Inlet to be closed to shellfish harvesting and recreation. We appreciate the large task of identifying the causes of pollution, focusing on solutions, prioritizing actions, and obtaining funds. The draft is a good start. The strategies for actions needed for a healthy Puget Sound by 2020 will undoubtedly involve the Ports, who will be willing and able participants to the extent of available funding.



November 19, 2008

Mr. David Dicks, Executive Director  
Puget Sound Partnership  
Post Office Box 40900  
Olympia, Washington 98504-0900

RE: Puget Sound Partnership Draft 2020 Action Agenda for Puget Sound

Dear Mr. Dicks:

The Puget Sound Regional Council appreciates the opportunity to comment on the Puget Sound Partnership's *Draft 2020 Action Agenda for Puget Sound* ("Action Agenda"). The Partnership is to be commended for completing such a tremendous amount of work in such a short amount of time. The draft Action Agenda is comprehensive, forward thinking, and firmly grounded in ongoing work of the many stakeholders, agencies and authorities who have an interest in protecting the health and future of Puget Sound. We applaud your efforts.

As you know, under state law, PSRC is the Regional Transportation Planning Organization (RTPO) and under federal law it is the designated Metropolitan Planning Organization (MPO) for the central Puget Sound region. In these capacities, PSRC prepared VISION 2040, the central Puget Sound region's adopted growth, environmental, economic and transportation strategy, and *Destination 2030*, the region's Metropolitan Transportation Plan (MTP). As the region's Economic Development District, PSRC maintains a Regional Economic Strategy consistent with its transportation plan and long range vision.

VISION 2040 contains the region's Multicounty Planning Policies adopted under the Growth Management Act, and serves to coordinate the long-range planning efforts of the region's four counties and 82 cities and towns. As such, PSRC's adopted policies and guidance directly impact how the region will help to implement the Action Agenda. Many of our adopted policies and elements of our work program are closely aligned with the Action Agenda. It's clear that implementing this ambitious Agenda will require a massive, long term effort by a wide number of stakeholders, including state agencies, service providers, and local governments. Our ability to work together will contribute to success.

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We have conducted an initial staff review of the Action Agenda, and will look forward to discussing it with our full membership in the upcoming months. The comments below are organized in three sections: General Comments, PSRC Work Program, and Local Jurisdictions.

### **General Comments.**

Central Puget Sound Region Coordination. The PSRC provides a regional table for King, Kitsap, Pierce and Snohomish counties and its cities, transportation agencies, ports, tribes, and other stakeholders. PSRC is very interested in working with the Puget Sound Partnership to provide a forum to work with our member jurisdictions as it pursues implementation of the Action Agenda.

Organization. The document's organization around four primary questions is clear and compelling. Within Question 3, however, the present organization is somewhat confusing. Each of the five "Priorities" (A, B, C, D, and E) has an introduction, numbered subsections (e.g. "A.2"), numbered actions, followed by "Near Term Actions." The Near Term Actions don't always align with or address all of the material in the preceding numbered actions. Are the first sets of actions "non-Near Term" actions? If so, when will they be addressed? The relationship of the Near Term Actions to other actions in the subsections should be explained and clarified.

Detail. The Action Agenda provides an excellent inventory of actions, measures and issues that must be addressed to ensure the improved and continued health of Puget Sound. As the Action Agenda further develops, it would benefit from greater detail. It isn't immediately apparent who is responsible for various actions. In what order are they to be performed? Among the Near Term Actions, which are the top priorities? Will there be a detailed, first year work plan? The Draft Action Priorities columns in the Action Area Profiles section are useful, although it is unclear which are of the highest priority. Similarly, the table in the *Question 4* section is a useful summary of what seem to be the Near Term Actions that provides some additional detail on the nature of the actions, roles and partners. However, timing and priority are not clear. Near Term Actions for Priority E appear seem to have been inadvertently omitted from this table. Location maps of the Action Areas would also be a useful addition.

Strength. The framing narrative and action statements are direct and well-written. At times, headings use terms like "prohibit," while recommendations and actions propose "avoiding" and "discouraging" certain activities, chemicals, processes, etc. The Action Agenda should contain stronger recommendations for necessary regulatory approaches, i.e., prohibiting the use of harmful substances or practices through legislation or regulation.

Natural Resource and Rural Areas. We are pleased that the Action Agenda recognizes the critical relationship of land use – particularly in unincorporated areas – to the health of Puget Sound. Distinctions between the different types of unincorporated lands should be made for clarity. In several sections, the Action Agenda seems to refer to natural resource lands and rural areas interchangeably. Natural resource lands are areas designated as working farms, forests and mineral resource lands under the Growth Management Act, while rural areas may contain a wider variety of residential and commercial uses. Under the Growth Management Act, rural areas and natural resource areas have distinct and different roles in accommodating future growth. The Action Agenda should clarify this distinction. In addition, while actions are identified for Natural Resource Lands (A.2), the Action Agenda seems to lack attention to the critical role of rural development trends and practices. The Action Agenda should recognize that current development practices in rural areas may be inconsistent with the Puget Sound Partnership’s central objectives.

Financial Benefit. The Financing chapter recognizes the economic benefits that Puget Sound brings to the State of Washington. The introduction cites the benefits derived from fishing and shellfish, tourism and boating, and mentions the importance of a healthy Sound to business attraction and retention, property values, and quality of life. This section would be strengthened if it also referred to the economic value that Puget Sound commercial ports and shipping activity bring to the regional and national economies. A cornerstone of the central Puget Sound Regional Economic Strategy is maintaining and enhancing Puget Sound’s function as a key international gateway. Continued, environmentally friendly commercial use of our waterways must be a priority. In addition to commercial activities, the Puget Sound is a critical resource for the United States Military, which is a source of significant economic activity in the central Puget Sound region. A 2003 economic impact study showed a total of about 132,000 direct and indirect jobs in the region related to central Puget Sound’s military bases. The Action Agenda should recognize Puget Sound as a critical resource for the U.S. Military.

“Triple-Bottom-Line”. The Action Agenda is built on the recognition of competing objectives and the opportunity for multiple “winners.” To further that aim, care should be taken to ensure that the identified actions are mutually supportive and evaluated through a “triple-bottom-line” approach; that is, an evaluation framework that considers the environmental, economic, and social impacts of the actions. Some actions may have unintended consequences. For example, encouraging the approval of new septic system treatment technologies (C.4.2), may actually allow more development activity in rural areas, contrary to the objectives of minimizing rural densities (A.2.2.5). Many approaches that we may take to address environmental issues may have economic or social consequences. These must be carefully considered.

### **PSRC Work Program.**

Implementing VISION 2040. We appreciate the inclusion of “implementing local portions of VISION 2040” as priority actions for the North- and South Central Action Areas. As PSRC’s jurisdiction includes a third Action Area, a similar reference should be included in the Hood Canal Action Area priorities. VISION 2040 policies and guidance represent regional agreement on a wide variety of issues that can be drawn upon to show support for many of the priorities in the PSP Action Agenda.

Staffing and Resources. We see several Action Agenda items that have implications for PSRC’s work program. Many of these actions and tasks are beyond the scope of our current work program and budget. PSRC would be interested in determining what new funding and resources would be required for PSRC to undertake this additional work.

A Coordinated Vision. The Action Agenda calls for conducting a regional planning forum to create a coordinated vision for guiding growth at an ecosystem scale (Action A.1.1). This is described as involving PSRC, organizations responsible for the Cascade and Olympic Agendas, and other stakeholders. This would likely be a major effort requiring dedicated staffing and resources. PSRC would likely require additional resources to engage in developing a coordinated vision for the Puget Sound. PSRC should be listed as a partner for this Action in the Question 4 Actions Summary Matrix.

Modeling. A Near Term Action in section E.3 (E.3.14) calls for the development of a long-term plan for future scenario modeling, describing the roles and responsibilities of collaborators in carrying the work forward. PSRC conducts regional transportation, land use, and air quality modeling for the central Puget Sound region, which may be of benefit to this action. If PSRC were involved in this effort, support for additional scenario modeling and analysis would likely be necessary.

### **Local Jurisdictions.**

Staffing and Resources. Many of the Action Agenda’s proposals would require implementation at the local level. PSRC can assist with coordination and help determine what this might mean for our member jurisdictions. Activities such as monitoring permit condition compliance and the effectiveness of mitigation measures, data development, inter-jurisdictional planning, and information sharing would likely require a large commitment of new resources. While the Action Agenda contains references to “providing stable funding” for these and other activities, it cannot be emphasized enough how important this funding will be for local governments and PSRC. We appreciate that Action D.5.2 recognizes that local jurisdictions – including cities, counties, and regional agencies – will also require new funds to support and implement the Action Agenda. .

Growth Management Act. Many of the recommendations in the Action Agenda have implications for how local jurisdictions plan under the Growth Management Act. Will the Action Agenda propose specific amendments to the GMA – perhaps to apply coordinated GMA planning to the large, multi-county PSP region? For example, will the policies or agreements developed as part of the coordinated vision for growth at the ecosystem scale have authority to guide growth under the Growth Management Act, as Multicounty Planning Policies and Countywide Planning Policies do today? PSRC would welcome a discussion about the interaction of the Action Agenda and local and regional planning under the Growth Management Act.

Infrastructure and Financial Incentives. The Action Agenda strongly recognizes the Growth Management Act concept of encouraging growth in already urbanized areas to protect intact ecosystems, rural and natural resource lands, and environmentally critical areas. In order to accommodate growth, cities must provide municipal services, amenities such as parks, and physical infrastructure such as sewer and stormwater systems. Local governments will be reliant on additional resources to provide the infrastructure that will allow them to accommodate growth, reducing pressure on priority conservation areas. This will be a critical step in local implementation of the Action Agenda.

In conclusion, the PSRC would like to again thank the Puget Sound Partnership team for the excellent work it has done to develop this ground-breaking new approach to protect and enhance the Puget Sound. It is only through innovative and coordinated efforts such as this that we will be able to realize our shared vision for a sustainable future for the Puget Sound. We look forward to working with you to make it a reality.

If you have questions about our comments, please call me at (206) 464-7515, or Norman Abbott, Director of Growth Management at (206) 464-7134.

Sincerely,

A handwritten signature in black ink that reads "Bob Drewel". The signature is written in a cursive, slightly slanted style.

Bob Drewel  
Executive Director

cc: Mark Gulbranson, Deputy Executive Director  
Norman Abbott, Director of Growth Management



**Ronald Wastewater District**  
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**COMMISSIONERS**  
Arnold H. "Arnie" Lind  
Arthur L. Wadekamper  
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**GENERAL MANAGER**  
Michael U. Derrick

November 12, 2008

Puget Sound Partnership  
PO Box 40900  
Olympia, WA 98504

**RE: DRAFT 2020 Action Agenda for Puget Sound**

Dear Puget Sound Partnership:

I read the Draft 2020 Action Agenda and have enclosed the pages where I believe changes are needed. My suggested changes are in red, are primarily stylistic, and if they are incorporated into the draft action agenda would add consistency and clarity to the document. Also, it seems to me that the document would be more useable if the page numbering were sequential and consistent. For example, the very last page of the 96 page action agenda is numbered "8."

Other than these few minor suggestions, the 2020 Action Agenda for Puget Sound is an interesting document, to say the least.

Sincerely,

Michael U. Derrick  
General Manager

cc: Board of Commissioners

**Working for Environmental Protection**

A special purpose district formed pursuant to RCW title 57

Now it's time for Puget Sound.

## **Introduction to the Puget Sound Action Agenda**

The Partnership was given three charges from the Legislature: 1) to define a 2020 Action Agenda to guide efforts to protect and restore Puget Sound, based on science and with clear and measurable goals for recovery; 2) determine accountability for achieving results including performance, effectiveness, and the efficient use of money spent on Puget Sound; and 3) to promote public awareness and communication to engage their support for a long-term strategy.

In creating the Action Agenda, we have collaborated with all affected parties, used the experience and expertise of existing regional agencies, and involved local communities and scientists in crafting the regional solutions. The Partnership has sought practical solutions with reasonable expectations for implementation to build upon existing programs that are working wherever possible, and has continually sought scientific input about the risks facing Puget Sound, the potential certainty for actions, and risks of additional inaction.

The final Action Agenda is intended to be a living and adaptable guide to be used by federal and state agencies, tribes, city and county governments and other agencies, businesses and environmental organizations, watershed groups and individual landowners as they take action to protect and restore the Puget Sound. It serves as a statement of common purpose across the Sound and sets the stage for cooperation and collaboration among partners.

## **Inside the Action Agenda**

The Action Agenda is structured around the four basic questions:

1. What is a healthy Puget Sound?
2. What is the status of Puget Sound and what are the biggest threats to it?
3. What actions should be taken that will move us from where we are today to a healthy Puget Sound by 2020?
4. Where should we start?

### *1. What is a healthy Puget Sound?*

A healthy Puget Sound includes a thriving natural world, high quality of life for people, including a vibrant economy. Using goals set out by the legislature, the Partnership has, for the first time in Puget Sound, has identified measurable indicators that can be monitored over time to assess the progress being made. We have also set out targets and benchmarks to guide our actions.

### *2. What is the status of Puget Sound and what are the biggest threats to it?*

In synthesizing the information available about the condition of Puget Sound's health and the threats, we have concluded that significant losses of our estuaries, rivers and floodplains, and forests combined with the slew of pollutants delivered to Puget Sound every day have had profound, and potentially some irreversible consequences, on the present and future health of the region. Anticipated population growth and climate change will amplify current the situation. Compounding these challenges is the fragmented system now in place to manage natural resources. The region has not been equipped or organized to even solve the current problems facing Puget Sound, let alone the changes that will come.

## What can people do now to help?

Citizen action is essential to successfully restoring and protecting Puget Sound. The good news is that when educated about the serious problems facing Puget Sound, citizens are more willing to make lifestyle and support public policies that will make a difference.

The Partnership believes the daily involvement of thousands of citizens doing many small and big things to save Puget Sound will make a dramatic difference.

To this end, the Partnership is working with agencies and groups across the Puget Sound to help get the word out about the simple things average citizens can do to make a difference in their area of the Sound. If you want to be a part of the solution, here are some easy ways to get involved.

### Fix up!

Get involved on the ground with restoration, protection, and outreach projects in your area of Puget Sound. Be an active part of the solution by getting out there and helping fix up Puget Sound. There are hundreds of organizations that need your help. Visit [www.psp.wa.gov](http://www.psp.wa.gov) to connect with a group in your area.

### Soak up!

Soak up Puget Sound! For centuries the land of this area has acted as a natural sponge, soaking up and filtering out all of the harmful or toxic particles being carried by surface water before it reaches the Sound. Pavement and pipes that carry unfiltered water directly into Puget Sound are destroying this essential service. Do your part to increase the soaking ability of our land by increasing rain gardens, pervious surfaces, native plants and reducing pavement, large areas of grass and clear cutting of trees.

### Clean up!

The number one contributor to the decline in Puget Sound is all the harmful and toxic chemicals we add to the water running into Puget Sound through everyday activities. We need to clean up our act and therefore clean up the waters of Puget Sound. Some of the top contributors and easy steps you can take to clean things up are:

#### Vehicle Operations

What come off of and out of your car makes its way into Puget Sound

- Drive less
- Check for leaks
- Use substitute for copper break pads
- Ask for steel tire weights instead of lead

#### Fertilizers & Herbicides

What does not get used up by plants makes its way into Puget Sound

- Pull and smother weeds instead of spraying
- Follow package directions exactly
- Improve soil
- Plant natives

### **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

### **Pet Waste**

What is left on the lawn will be washed off into Puget Sound

- Scoop ~~your~~ poop and put it in the trash!

### **Household Products/Chemicals**

What goes down your sink, toilets, and drains makes its way into Puget Sound

- Choose least toxic alternative for household cleaners
- Use more elbow grease, less chemicals
- Use your local waste facility to dispose of chemicals properly

### **Septic Systems**

What a septic system cannot handle makes its way into Puget Sound

- Maintain your septic system
- Do not overuse or abuse its abilities (toilet paper only)
- Fix failing septic systems

- **CONNECT TO SANITARY SEWERS WHERE AVAILABLE**

## QUESTION 2

### What is the status of Puget Sound and what are the biggest threats to it?

The people of Puget Sound have built a thriving economic center, creating the second largest port on the West Coast, global enterprises such as Boeing, Microsoft, and Starbucks, lively ecotourism businesses, world-renowned seafood industries, sophisticated tribal communities, and a timber industry that is still a national and international leader. Some of our industries, such as timber and shellfish production, are directly dependent on the ecosystem, while others rely on Puget Sound for shipping and an attractive quality of life to attract prospective workers and their families. In a scant 150 years, the human population of Puget Sound has grown from 50,000 to four million.

During that time, we eliminated three-quarters of the saltwater marsh habitat through dikes and drainage, and armored one-third of the Puget Sound shoreline. We removed 66 to 84% of the old-growth forest in the basin in the last 50 years. We constructed 500,000 septic systems, permitted and constructed 972 municipal and industrial wastewater discharges, spilled at least 230,000 gallons of oil and hazardous waste (just since 1985), constructed ten major dams and thousands of small diversions and stream blockages, re-plumbed the Cedar River system, straightened and diked hundreds of small and large rivers, and introduced almost 100 invasive marine plant and animal species—sometimes intentionally. From 1991 to 2001, impervious surfaces increased another 10.4%, leading to further changes in streamflow runoff and expanding a major pathway for a host of other pollutants to enter our rivers, soil, and food supply.

What do these changes tell us for the overall health of Puget Sound? Prior to the identification of ecosystem level indicators, we reported information on starving orcas, missing salmon runs, closed shellfish beds, toxic beaches, massive fish kills, and disease outbreaks from eating contaminated seafood, but did not know what measures best reported the overall condition of Puget Sound. Using the indicators identified in Question 1, this section of the Action Agenda summarizes what we know today about the health of the ecosystem. Understanding the current state of Puget Sound will help us better identify actions needed to reach the goals. We have also categorized the threats facing the region and identified two critical threats that must be addressed immediately.

In 2009, the Partnership will produce a new “State of the Sound” report that will more comprehensively reflect this approach, build on earlier efforts to describe status and trends within Puget Sound, and present the problems in a fuller context of overall ecosystem health. Over time, the region will need to know the magnitude of threats overall, and within and between geographic sub-regions.

#### How did the Partnership identify the health of Puget Sound and threats?

Over the past 18 months, the Partnership used three related efforts to better understand the existing condition of the Puget Sound ecosystem and the key threats to ecosystem recovery: an integrated ecosystem assessment led by NOAA, a series of topic forums that assembled the best current information about the Sound, and a process to gather and synthesize data at the local level in each of the seven action areas. The integrated ecosystem assessment will ultimately provide a more comprehensive picture of status of and threats to the Puget Sound ecosystem, but our work

- SEE ELEMENTS OF STYLE PWD  
COMMON WRITER'S "QUOTE"  
CONTAMINATED
- **Current condition:** Water quality in Puget Sound waters has been affected by pollution from human and animal wastes, fertilizers and pesticides, and toxic chemicals that run off pavement during storms. Over 1,000 freshwater lakes and streams are classified as "impaired" and low oxygen conditions are increasingly frequent in Puget Sound marine waters. Puget Sound contains some of the most toxic marine mammals in the world. Harbor seals in Puget Sound were found to be seven times more contaminated with the persistent toxic chemicals known as PCBs than those inhabiting the adjacent Strait of Georgia in Canada. The salmon and rockfish that we eat are also polluted.

### What threatens the health of Puget Sound?

The current condition of Puget Sound shows signs that the web of life is fraying. What is causing these problems? It is not only what humans do as they live, work and play in Puget Sound, but how they go about it that affects the health of the Sound overall. Some activities are fairly obvious as harmful to ecosystem health, such as the input of toxic pollution, oil spills, and sewage; water withdrawals from rivers and aquifers; and habitat destruction. Other activities that are technically "threats", such as the harvest of timber, fishing, shellfish and finfish aquaculture, and farming, are highly beneficial to people. These activities depend directly on healthy ecosystem conditions but, if not properly managed, can also damage the ecosystems upon which they depend.

The Partnership has identified six broad categories of threats: habitat alteration, pollution, surface/groundwater impacts, artificial propagation, harvest, and invasive species. The magnitude of these threats is amplified by large-scale processes such as weather, volcanoes, earthquakes, ocean circulation patterns, population growth and climate change. Each of the threat categories is described below. Specific local information about threats in each of the action areas is presented in Question 3.

**Habitat Alteration and Land Conversion:** Habitat alteration consists of activities such as clearing forests, armoring shorelines, diking and draining saltmarshes and freshwater wetlands, dredging, filling, and paving the land. Habitat altering activities occur throughout the region from the forests on the flanks of the Cascades and Olympics to the beaches and sea floor of the Sound. Habitat diversity, quality and availability, species diversity and abundance, water quality and water quantity, are significantly threatened by habitat alteration. In addition, habitat alteration amplifies many other threats, especially pollution and ground and surface water availability. Because of these interrelationships, habitat alteration, especially land conversion, is one of the most significant threats to Puget Sound recovery.

The alteration of nearshore habitat through the construction of docks and bulkheads provides a striking example of how a localized activity can threaten broad components of the ecosystem. The nearshore environment is a rich feeding and rearing ground for herring, especially when eelgrass beds are present. Pacific herring in Puget Sound are a universal source of prey for all species of salmon, as well as seals, sea lions, orcas, hake, halibut, cod, and 14 species of ducks and gulls. Herring also feed loons, herons, puffins and many other marine bird species. Herring populations have fluctuated dramatically in Puget Sound in recent years due in part to the alteration of habitat that is important to their survival. 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.

commercial, and industrial demand; land use practices that alter stream flow patterns; and modification of stream channels through dams, levees, bank armoring and ditching.

**Other threats due to invasive species, artificial propagation, harvest and other activities:**

- **Invasive species** enter Puget Sound through importation of seeds, fruits, plants, and vegetables; ballast water discharges from ships; soil brought in with nursery stock; on commercial and recreational boat hulls; and from people releasing exotic pets and plants "into the wild." While a comprehensive inventory of invasive species across Puget Sound has not yet been conducted, the magnitude of the problem is beginning to emerge from regional studies. The threats from invasive species vary across the Puget Sound action areas. 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. Domesticated animals can transmit potentially fatal diseases to native species.
- **Artificial propagation** of species is conducted for human use and quality of life benefits. These activities may contribute pollutants to the environment or facilitate the introduction of non-native species, depending on how they are conducted. The potential risks to native species, modification of habitat, and aesthetic impacts resulting from aquaculture and hatchery operations vary considerably by site, species, and methods. Hatchery operations to produce salmon have historically had effects such as loss of genetic diversity and genetic fitness, disease transfer, overharvest of native species that are co-mingled with hatchery stocks, and habitat impacts from the facilities themselves. Impacts have varied depending on the site, methods of operation, and the production objectives at each facility.
- **Harvest** can occur on both plant and animal species. Harvest is considered to be a historic factor in the decline of Puget Sound rockfish, Pacific hake, pinto abalone, and Chinook salmon. Past harvest management practices focused on individual species and attempted to maximize the sustainable yield for human harvest rather than considering other species and ecosystem needs. For some threatened animal species, focused harvest management has been able to stem the decline of the target species, but may not adequately consider cross-species impacts, such as by-catch of other fish, birds, and marine mammals, or the loss of food for predators such as orcas. Harvest of plant species (such as trees) that serve as habitat for fish and wildlife species may adversely affect the species that depend on them or remove building blocks that form habitat.

**What are the biggest problems that we need to begin to address?**

In synthesizing the information available about the condition of Puget Sound's health and the threats, the Partnership has concluded the signs of lost icons, ~~points~~ <sup>indicators?</sup> to ominous signs of systemic failure. The significant losses of our estuaries, rivers and floodplains, and forests combined with the slew of pollutants delivered to Puget Sound every day have had profound and potentially irreversible consequences on the present and future health of the region.

Population growth and climate change will amplify ~~current~~ the situation. At least another million people will live here in the next 15 to 20 years. At the same time there is compelling evidence that

*Too many "signs"?*  
*Signs...point*

not address Sound-wide and local problems on a coordinated basis at an ecosystem scale.

- E. **Build and implement the new system** to support the implementation and continual improvement of the Action Agenda. This includes using a **performance management** system that includes adaptive management, coordinated monitoring, accountability for action, and coordinated data management; providing **sufficient, stable funding** focused on priority actions; implementing a focused **scientific program** with priorities for research, appropriate measures to improve understanding of the ecosystem and the effectiveness of our actions, and clear pathways for informing decision making; and increasing and sustaining coordinated efforts for **communication, outreach, and education**.

Question 3 of the Action Agenda describes what we need to do, identifies near-term actions, and describes how we need to do this together. **Part I describes the five Sound-wide strategic priorities for the Puget Sound ecosystem**. For each priority, there is a description of the problem that it is intended to address and rationale for choosing the priority, key objectives for attaining desired ecosystem outcomes, and near-term actions <sup>the</sup> needed to move the region forward. **Part II has eight action area profiles** that describe the different benefits of each action area, the major local ecosystem stressors, and the local priority actions that mirror the regional priorities and reflect local conditions and issues. The implementation roles and responsibilities for the actions are listed in the Action Agenda under Question 4: Where should we start.

### **How were the priorities and objectives developed?**

The Action Agenda strategies and actions have been developed through extensive collaboration with experts and interests from around Puget Sound. Materials for the actions were developed after synthesizing the input from several processes. Over 300 inventories of existing programs and priority actions were provided by implementers via an online inventory, at action areas workshops, and in written comments. Topic forum papers addressing each Partnership goal and associated workshops were attended by more than 500 people, and generated over 1,200 pages of comments. In all, over 1,600 people attended workshops to develop the Action Agenda and over 8,000 comments were received in writing or online. Scientific input was obtained from the early results of the scientific assessment of the ecosystem and the topic forums, and findings were peer reviewed by the Science Panel. In addition, the legislation creating the Partnership identifies specific requirements for managing Puget Sound as an ecosystem.

The Partnership first used the topic forum papers to identify a set of principles for ecosystem management (see below). These principles were refined by the Leadership Council, Ecosystem Coordination Board, and Science Panel. With the principles in hand and the knowledge that habitat loss and water pollution are over-arching issues facing the region, the Partnership looked at the topic forum papers, comments received, and legislative direction to identify the five strategic priorities. The objectives and rationale for action under Priorities A-D was identified through a synthesis of the topic forum work—in many cases, multiple papers pointed to the same or similar needs. The near-term actions for Priorities A-D were identified through the topic forum papers, comments from the action areas, and refined through direction from the Ecosystem Coordination Board and Leadership Council. Criteria used to identify and refine the near-term actions are largely

- 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 statutes 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.
  - 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.

## **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.

**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.

- The Action Agenda emphasizing the implementation of salmon recovery projects and identifies the restoration of Puget Sound estuaries as important to the ecosystem. By designing one or more of the large estuary restoration projects as experimental designs that can be measured, scientists and resource managers would be better poised to answer whether actions work as planned; the role of nearshore biology, physical processes, and functions in the broader ecosystem context; and what findings can inform similar projects around Puget Sound.
- The ability model future ecosystem impacts will also improve restoration strategies by identifying how restoration projects affect future conditions and how climate change affects restoration opportunities.

**B.1 Implement and maintain priority ecosystem restoration projects for marine, marine nearshore, estuary, freshwater riparian and uplands.**

The continued implementation of species recovery plans is a cornerstone of the restoration strategy for Puget Sound. Salmon recovery plans provide a broad suite of high priority restoration projects that have been scientifically reviewed and have substantial community support. These projects will result in expanded salmon habitat as well as broader ecosystem benefits such as improved water quality, scenic values, and improvements to other species. Restoration project types are highly varied and are tailored to local watershed conditions. Reconstruction of river delta habitat is a high priority in many river systems, and other project types include reforestation, removal of levees and shoreline armoring, and the removal of derelict fishing gear.

In the near-term, prioritize the implementation of restoration projects identified within existing species recovery plans, flood hazard management plans, road decommissioning plans, and other documented, well-vetted processes. Over the long-term, implement projects identified through the watershed assessment and harmonization of existing efforts identified in Priority A.1.

**B.1 Near-term Actions**

1. Implement restoration projects in the salmon recovery three-year work plans and the Estuary and Salmon Restoration Program of the Nearshore Partnership.
2. Complete large-scale restoration projects at the mouths of major river systems in Puget Sound where there is a high likelihood of recreating ecosystem function. These large-scale projects often require funding amounts not typically available through current grant programs. Examples of projects which already have substantial analysis and are in progress include:
  - a. Finish restoration of 762 acres of Nisqually Estuary, by removing dikes to return the area to tidal influence.
  - b. Fund the restoration of 400 acres of tidal marsh associated with the Smith Island Estuarine Restoration project in the Snohomish River Estuary.

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*not needed*

- c. Restore floodplain and river processes in the lower 2.6 miles of the Dungeness River.
- 3. Complete the Puget Sound Nearshore Partnership's General Investigation in a timely way to identify and refine nearshore restoration opportunities and move toward implementation.

**B.2 Revitalize waterfront communities while enhancing marine and freshwater shoreline environments.**

The transition from a resource-based economy has left some Puget Sound communities with degraded waterfronts from old industrial communities. Many of Puget Sound's urban centers are located on marine or freshwater shorelines, but few have been able to develop a built environment that complements their shoreline environment. Restoration and stewardship actions can remove obstacles to waterfront redevelopment and reduce new impacts from waterfront activities.

B.2.1 *Restore urban waterfront areas and communities in a manner which complements functioning shoreline ecosystems.*

B.2.1.1 Improve the coordination of waterfront restoration and clean up efforts.

B.2.1.2 Prioritize habitat restoration at clean up sites which are located proximate to intact ecosystems and where the probability of recreating ecosystem function is high.

B.2.2 *Expand and fund "green port" and clean marina programs to foster environmental stewardship for port and marina development and management.*

**B.2 Near-term Actions**

- 1. Fund a one year pilot program to develop a coordinated clean up and restoration plan for the Port Angeles Harbor and waterfront. Implement the plan upon completion.
- 2. Continue Bellingham Bay Pilot Program to clean up Bellingham Bay in a coordinated way.

**B.3 Support and implement stewardship incentive programs to increase private landowners ability to undertake restoration projects.**

Restoration actions vary in scale and take place on both public and private lands. There are currently numerous programs available in Washington State that can have positive outcomes for the environment with appropriate incentives, technical assistance, and participation. Examples include: direct financial incentives (grants, subsidized loans, cost-shares); indirect financial incentives (property tax relief); technical assistance (referrals, trainings, design assistance); and recognition/certification for products or operations.

B.3.1 *Develop, use, coordinate, expand and promote financial incentives, technical assistance, and outreach that encourage private landowners to undertake and maintain restoration projects.*

*the ability of private landowners to*

4 or five points? see above.

- Duplicate
- *Conduct planning, implementation and decision-making in an integrated way and from an ecosystem perspective.*
  - *Support, develop, and integrate climate change programs and adaptation strategies to improve implementation effectiveness and regional and local readiness for anticipated changes.*
  - *Build and sustain long-term capacity of partners to effectively and efficiently implement the Action Agenda*
  - *Build and sustain long-term capacity of partners to effectively and efficiently implement the Action Agenda*
  - *Improve compliance with rules and regulations to increase the likelihood of achieving ecosystem outcomes.*

The Action Agenda funding strategy is explained in more detail in Section E and attached appendix.

**D.1 Conduct planning, implementation and decision-making in an integrated way and from an ecosystem perspective consistent with the Action Agenda.**

The Puget Sound Partnership will need 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.

D.1.1 *Develop methods for and conduct future planning for biodiversity and species recovery, water quality, water supply and reuse, and land use in an integrated way.* This includes coordinating planning efforts among and between federal, state, local and tribal governments.

D.1.2 *Integrate and coordinate implementation of existing Sound-wide and local plans and programs to improve efficiency and effectiveness in addressing Action Agenda priorities.* This will include, but is not limited to, the statewide Biodiversity Report, species recovery plans, nearshore needs assessment; local watershed-based salmon recovery plans, water quality plans, GMA comprehensive plans and programs, Shoreline Master Programs, marine resource plans; harvest management plans for salmonids and other fisheries, shellfish, and salmon hatchery plans; and capital facilities plans for state and local governments, ports, utilities and special purpose districts.

The coordination and integration should be consistent with the Action Agenda. Over the long-term, integrate this work with the results from the watershed assessments (see Section A). In the near-term while the watershed assessments are being prepared, continue and expand high level coordination to improve consistency and efficiency with the Action Agenda and Action Area priorities.

D.1.3 *Implement existing species recovery and biodiversity plans in a coordinated way while a more integrated planning approach is created.* Coordinate implementation of

ecosystem protection, freshwater flows, and water quality as identified in Sections A, B, and C.

*D.1.4 Set future fishing and hunting harvest rates for species based on ecosystem needs, in addition to tribal treaty right, economic, and quality of life concerns.*

*D.1.5 Set fishing and hunting harvest rates and communicate results in way that is transparent with readily available information.*

*D.1.6 Manage hatcheries and other artificial propagation methods in a way that is consistent with the Action Agenda.*

*D.1.7 Consider and support recommendations from the U.S. Commission on Ocean Policy's final report, "An Ocean Blueprint for the 21<sup>st</sup> Century," as they relate to strategies and actions that will support the recovery and long-term health of Puget Sound.*

#### **D.1 Near-term Actions**

1. Coordinate implementation of existing plans and programs that support the Action Agenda, and realign or discontinue plans and programs that conflict with the strategies and actions set forth in the Action Agenda. Develop regional guidance for this coordination, including ways to minimize work for time-limited local staff.
2. Develop and implement the Steelhead Recovery Plan, building on the Chinook Recovery Plan and integrating the Action Agenda priorities.
3. Use and augment existing species plans to create actionable workplans for imperiled species without existing or specified plans.
4. Continue the integration of habitat, harvest, and hatchery efforts in the salmon recovery plans and watershed three-year work plans.
5. Make the southern resident killer whale plan actionable with assignments and implementation timelines and implement the plan.
6. Implement the 2008 revision to the Pacific Salmon Treaty.
7. Implement the priority recommendations of the Hatchery Scientific Review Group to update state hatcheries to protect wild salmonid stocks.

#### **D.2 Support, develop, and integrate climate change programs and adaptation strategies in the Action Agenda to improve implementation effectiveness and regional and local readiness for anticipated changes.**

*D.2.1 Integrate the recommendations of the Land Use and Climate Change Advisory Committee with priorities, steps, and initiatives consistent with the Action Agenda.*

*D.2.2 Integrate the recommendations of the West Coast Governor's Agreement and Western Climate Initiative with other State and local climate change initiatives.*

support to implemented NPDES permit programs; and d) EPA should coordinate directly with the Partnership and local implementers on growth and protection solutions.

D.3.5.4 Model stewardship behavior. Examples include, but are not limited to: a) participate in the Federal Green Challenge and other comparable programs to reduce waste and energy and conserve water; b) minimize homeland security related impacts from operations, maintenance and readiness training activities on ecosystem processes, structures and functions, and on marine mammals; c) maintain, repair, and decommission roads and fish passage barriers on United State Forest Service and other federal lands; and d) identify and implement improvements in federal facility wastewater and stormwater treatment processes that specifically target nutrients and other pollutants of particular concern for Puget Sound.

D.3.5.5 Provide scientific support and data management on Action Agenda priorities in coordination and cooperation with the Partnership and other implementers.

D.3.5.6 Provide adequate federal funding for the Action Agenda. Work with the Congressional delegation to increase funding for implementation of the Action Agenda. Improve coordination of federal agencies and codify ongoing federal authorization for funding (see funding section E.2). Align federal agency budgets for base programs with priorities of the Action Agenda as described in Priorities A, B, and C.

D.3.6 *Expand landowner participation in the voluntary incentive programs described in Priorities A, B, and C, to improve the ability of private landowners to protect and restore ecosystem processes.*

D.3.7 *Grow and use the Foundation for Puget Sound (non-profit entity) to increase education and outreach efforts.*

D.3.8 *Work cooperatively with Canada on management and scientific investigations to increase collaborative problem solving and information sharing.*

D.3.8.1 Continue collaborative work on trans-boundary issues and projects.

D.3.8.2 Continue to co-host the Puget Sound Georgia Basin Research conference.

### D.3 Near-term Actions

1. Integrate the work of the Puget Sound Nearshore Partnership (PSNRP), including the Estuary and Salmon Restoration Program, into the Puget Sound Partnership to improve efficiency, coordination and to avoid overlap and duplication of efforts.
2. Fund salmon recovery and other collaborative groups such as Regional Fisheries Enhancement Groups and 2514 watershed planning groups in the near-term to continue existing work.

**E.1 Build and use a performance management system to improve accountability for ecosystem outcomes, on-the-ground results, and implementation of actions.**

Performance management includes adaptive management, ecosystem monitoring, accountability for action, and information management. Adaptive management is currently not an organizing or central feature of most of the region's natural resource management efforts. While natural resource managers do adapt to numerous cues to be more effective, most implementers lack a formal way to adjust their actions. Formalized, rigorous and transparent adaptive management is a prominent element of a few key management programs in the region, including the Puget Sound Salmon Recovery Plan, the Forests and Fish law, and the Puget Sound Nearshore Partnership. There is a range of maturity among these programs, and in spite of these important steps forward Puget Sound still lacks an adaptive management program that works all the way from monitoring to evaluation to altering management approaches or strategies.

The Partnership has adopted a Plan/Do/Assess/Adapt framework for integrating science into management decisions and in aligning funding priorities with priorities for action. The framework will provide transparency about how resources are allocated, the effectiveness of implementers and the actions they take, and the progress against ecosystem goals. Equipped with this information, the Partnership can communicate effectively with the public and stakeholders to sustain support for the evolving Action Agenda.

E.1.1 *Establish clear processes through which performance and results will be assessed and adaptive actions will be identified.* The legislation creating the Puget Sound Partnership requires a reevaluation of the Action Agenda every two years, "using an adaptive management process informed by tracking actions and monitoring results." The Partnership's challenge is to find a way to inform the decision-making process with relevant information from public outreach, ecosystem monitoring, other scientific investigations, accountability, monitoring, and finance data related to Action Agenda implementation.

*to inform a process or to inform ~~dec~~ decision makers?*

E.1.1.1 Clarify and refine the decision-making roles of the Leadership Council, Ecosystem Coordination Board, Science Panel, and staff.

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.

E.1.1.3 Establish guidelines that direct resources to Action Agenda priorities.

E.1.2 *Develop and implement an accountability system to track the progress of implementation of actions identified in the Action Agenda.* The Puget Sound region has lacked an overall way to account for funds spent, actions taken, and progress achieved at the ecosystem scale. Some accountability mechanisms for localized ecosystem protection or restoration outcomes do exist, such as with relationships between regulatory agencies and entities working to comply with specific mandates and relationships between project sponsors and funders. However, the system has relied heavily on self-report and the consequences of not reporting, not meeting targets, or not fulfilling commitments are minimal and insufficient to impact behavior or alter funding. In addition, funding cannot be directed to the most effective actions because there is a lack of information to do a comparative analysis. Finally, many

actions lack a single lead that can be held accountable for progress. The Partnership will track, evaluate, analyze, and report on progress toward implementation of projects critical for meeting ecosystem goals.

- E.1.2.1 Establish a system to track the funds from state, federal, local, tribal, and other sources spent on actions intended to benefit the Puget Sound ecosystem.
- E.1.2.2 For all actions, develop a detailed budget, a scope of work, an action lead, a schedule with milestones, and a performance measure.
- E.1.2.3 Require action leads to account for dollars spent, actions accomplished, and outcomes achieved during each reporting period beginning in 2009.

E.1.3 *Develop and implement an information management system to support ecosystem management decision making.* The data and information needed to inform ecosystem management is housed in different agencies and offices and in different information systems. Integration of all types of relevant financial, scientific, monitoring, spatial, management and institutional data will be essential to supporting implementation of the Action Agenda.

- E.1.3.1 Develop a comprehensive data management strategy to support implementation of the Action Agenda.
- E.1.3.2 Implement a distributed data and information exchange system that can be contributed to and accessed by scientists, implementers, policy makers, and other interests.

#### E.1 Near-term Actions

1. Identify and confirm the information needed to evaluate progress, as well as and the roles, responsibilities, and timelines related to making those decisions.
2. Continue to engage the Leadership Council, Ecosystem Coordination Board, Science Panel, and Salmon Recovery Council to advise the Partnership.
3. Pilot a process that incorporates scientific research (including status and trends monitoring and effectiveness studies), accountability tracking data, and public input to inform the development and implementation of the Action Agenda.
4. Develop a schedule and process to update the near-term actions and revise the Action Agenda strategies as necessary.
5. Submit recommendations to the Legislature to better align funding and resources with the Action Agenda in the November 2009 State of the Sound report.
6. Finalize the salmon recovery adaptive management plan as required by NOAA.
7. Build accountability and reporting system to track the Action Agenda and salmon recovery activities.
8. Develop a system to identify and track actions that are inconsistent with the Action Agenda.
9. Work with action leads to develop budgets and performance measures for all actions. Integrate into an adaptive management system.
10. Negotiate performance agreements with leads of actions related to salmon recovery plans, state agency work programs, and projects funded by state grant or loan programs.

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the same - if so,  
be same name -*

11. Develop and implement a Partner Program as specified in the legislation that created the agency.
12. Develop an activity integration tracking system support the Action Agenda accountability system.
13. Prioritize data for sharing and begin placing information on the U.S. EPA Data Exchange.
14. Identify credible sources that provide key information for project management and adaptive management. Make data accessible to the Partnership, as well as regional scientists and the public.

*Note that ecological monitoring actions are addressed under E.3.*

**E.2 Provide sufficient, stable funding and ensure funding is focused on priority actions to increase efficiency and effectiveness.**

Although significant expenditures have been made toward the protection and clean up of Puget Sound, implementation of the Action Agenda will require finding ways to spend existing dollars more effectively as well as raise new sources of funding. Many current sources are not aligned with Action Agenda priorities. Spending decisions on Puget Sound have been based upon the decisions of individual agencies and governments without the guidance of a long-term investment strategy for the Sound. Existing grant and loan programs for infrastructure and capital improvement receive requests for funding that are substantially greater than the amount available. The scale of the Action Agenda will require finding new sources to support clean up and recovery.

Over the past year, the Partnership has taken several steps to address the complex issue of funding long-term restoration and protection of Puget Sound. This work has included evaluating existing spending on conservation and recovery, identifying strategies to raise additional funding from conventional and innovative sources, securing additional state and federal funding for the near term, and for the first time, evaluating and aligning state agency budgets with Action Agenda priorities. Four overarching funding strategies are identified and summarized below, and are presented in more detail in the draft funding strategy.

**E.2.1** *Focus existing Puget Sound spending on Action Agenda priorities to increase efficiency.* Funds currently spent on Puget Sound conservation and recovery are raised from numerous sources, each of which has its own legal restrictions, fund constraints, administrators, policies and priorities. The effectiveness of this spending is limited by this decentralized, uncoordinated approach. These sources should be integrated and coordinated to address Action Agenda priorities and maximize benefits to Puget Sound cleanup and recovery goals.

**E.2.1.1** *Align federal, state and local funding with Action Agenda priorities.* The authorizing statutes for the Partnership prohibit actions by state agencies that are inconsistent with the Action Agenda. Even further, the Partnership will work with federal, state and local agencies to orient funding directed at Puget Sound to identified Action Agenda priorities.

- E.2.1.2 Conduct targeted procurement toward desired outcomes rather than broad grant solicitations. Targeted procurement will require restructuring project solicitations to describe outcomes needed to achieve Action Agenda priorities, such as a specific decrease in nitrogen loading or a specific increase in oak prairie habitat, and solicit proposals for actions that achieve these outcomes. Business, nonprofit, tribal, and agency applicants would be free to propose a variety of actions and the administering agency could select those with greater benefits and lower costs.
- E.2.2 *Provide additional funding to increase our ability to address priority prevention, restoration and cleanup needs.* Existing funding, even if realigned to be more effective, is not likely to be sufficient over the long term to meet Action Agenda goals. The Puget Sound region will need additional dedicated revenue sources. To begin to address this issue, the Partnership has evaluated sources of additional funding and the laws, policies, and practices that determine how they are raised and spent, and identified the amount of revenue that each option could produce.
- E.2.2.1 Create a dedicated regional source of funding. This strategy may entail creation of a regional district with the ability to raise money with voter approval.
- E.2.2.2 Create new and/or expand existing infrastructure loan programs for public infrastructure projects (e.g., sewers, stormwater retrofits, water quality facilities and potentially natural systems).
- E.2.3 *Use innovative funding methods, including market-based approaches, to increase diversity of funding mechanisms and to engage private sector interests.* In addition to new revenue sources, market-based mechanisms also hold the potential to help achieve Action Agenda goals. Existing regulatory frameworks do little to encourage market-driven conservation. More attention is needed on methods to harness the power of market approaches to produce conservation outcomes. Over the past year, the Partnership has identified banking and trading approaches to mitigation and water quality compliance that simplify permitting yet achieve higher environmental performance. This included analyzing ecosystem service markets in the United States and applications for Puget Sound, particularly water quality trading.
- E.2.3.1 Implement an in-lieu-fee mitigation program for Puget Sound.
- E.2.3.2 Implement a pilot water quality credit and trading system to improve compliance by allowing a wide range of treatment and source control solutions.
- E.2.3.3 Implement additional tools to set up ecosystem services markets. Expanding the use of ecosystem markets will require an evaluation of early pilot projects around in-lieu-fee mitigation and water quality trading. If these pilots are deemed successful, work would need to be done to develop methods for evaluating credits, establishing an institutional structure for trading, and establishing trading rules.

Note that some of the actions below are also in Priority D. They are restated here because they have the potential to generate additional revenue for implementation.

## E.2 Near-term Actions

1. For state agency budgets, review and provide input on state agency budget proposals for the 2009-11 and 2011-13 biennial budgets.
2. For state agency grant programs, advocate for changes to policies and priorities of the Public Works Trust Fund, Salmon Recovery Funding Board, Washington Wildlife and Recreation Program, and other state grant and loan programs, to encourage consistency with Action Agenda goals.
3. For grant requests to the state, per RCW 90.71.340, review grant and loan proposals for state funds to require consistency with Action Agenda goals.
4. For federal and local budgets, to the extent possible, review and comment to encourage alignment with the Action Agenda.
5. Implement targeted procurement on a pilot basis for a portion of the Puget Sound Acquisition and Restoration program that is focused on salmon recovery.
6. Develop targeted procurement for a portion of the largest state environmental grant programs, including the Salmon Recovery Funding Board, Washington Wildlife and Recreation Program, Aquatic Lands Enhancement Account and Conservation Commission. *Is this one agency? If so... if not*
7. Use Model Toxics Control Account fund balance to implement priority actions for the 2009-11 biennium as a bridge for a longer term dedicated funding source.
8. Continue to evaluate potential state funding sources in greater detail, including full legal and fiscal analysis, and prepare proposals for enactment of revenue sources in the 2010 or 2011 legislative sessions.
9. Pursue state legislation authorizing the creation of a regional improvement district.
10. Establish financial incentives for use of existing Department of Ecology and Public Works Board grant and loan programs to address Action Agenda priorities.
11. Develop financial incentives and provide financial and technical assistance to local governments to develop high priority projects in the Action Agenda for funding with existing Department of Ecology and the Public Works Board programs.
12. As part of implementing the Mitigation that Works recommendations (D.4.2), develop agreements with the U.S. Army Corps of Engineers, the state Department of Ecology and other relevant permitting agencies by 2010 on the design of a regional in-lieu-fee program.
13. Identify and implement one or more pilot projects to demonstrate the application of the in-lieu-fee program. Invest in several restoration projects that can provide initial credits for use in the in-lieu-fee program.
14. Evaluate use of a water quality trading program to address dissolved oxygen issues in south Puget Sound.
15. Develop a framework policy for permit-specific trading in the Puget Sound region. Investigate the use of trading policies and practices to address urban water quality improvements, including investments in urban combined sewer overflow projects.

ecosystem recovery. In addition, the Partnership will produce a Puget Sound science update, a compendium of scientific findings related to ecosystem recovery. The Partnership will produce these reports on a regular schedule. Findings and synthesis products should be peer-reviewed and the technical data and information on which they are based should be publicly available.

E.3.3.1 Assemble and synthesize status and trends information on ecosystem indicators and findings from effectiveness and cause-and-effect monitoring studies.

E.3.3.2 Prepare science portions of State of the Sound reports, including findings from monitoring and assessment program and Science Panel comments on implementation of the Action Agenda.

E. 3.3.3 Prepare Puget Sound science update reports to synthesize findings.

E.3.4 *Build and sustain regional capacity to conduct science.* Integrated, focused, and balanced capacities for monitoring, modeling, research, and data management will ensure that the Partnership obtains the information it needs to continually improve the science basis for ecosystem recovery. The Partnership will develop processes and organization to ensure the integrity of the science program and to engage the regional science community in this program.

E.3.4.1 Develop and sustain capacities for coordinated ecosystem monitoring and applied research, modeling of current and future ecosystem impacts, and research of emerging issues.

E.3.4.2 Support science education, training, and outreach.

E.3.4.3 Develop and sustain data management approach.

E.3.4.4 Develop and follow processes to ensure the integrity of science contributions to ecosystem recovery, including approaches to awarding funds for scientific investigation, peer review of materials forming the basis for Partnership decisions, external program peer review, and defining key research needs.

E.3.4.5 Organize and coordinate regional science capacities to align with needs of the Action Agenda and Puget Sound Partnership. This would include a) convening working groups (organized around topics, strategies, or geographic areas) to provide avenues for scientific community participation in the science program; b) coordinating with other science advisory groups, including Puget Sound Salmon Recovery's regional implementation technical team and the Puget Sound Nearshore Partnership's nearshore science team; and c) reviewing agency science programs and proposals, and recommending adjustments and investments to align agency contributions to the Partnership's needs.

### **E.3 Near-term Actions**

1. Fund ongoing monitoring programs to provide status, and trend, and effectiveness information to inform State of the Sound reporting and other synthesis.

2. Conduct a regional transition to coordinated ecosystem monitoring program. This effort would include a) completing an analysis of ongoing programs in relationship to Action Agenda goals, outcomes, strategies, and actions and b) working with regional experts and stakeholders (e.g., through the Puget Sound Monitoring Consortium) to recommend alignment of monitoring work with the Action Agenda. This would include study designs and coordinated logistics for an enhanced program for monitoring status and trends, program and project effectiveness, and cause-and-effect relationships.
3. Convene the stormwater monitoring work group as a continuing project of the Puget Sound Monitoring Consortium to develop a coordinated regional stormwater monitoring program that includes, but is not limited to, effectiveness of techniques and outcomes.
4. Complete development of the Puget Sound Salmon Recovery Monitoring and Adaptive Management Program. Implement priority features of this program.
5. Evaluate state and federal agency science programs and proposal for new initiatives. Recommend adaptations to programs and proposals to optimize agency contributions to Action Agenda and Partnership needs. Advocate for agency programs and proposals that address Partnership needs.
6. Refine ecosystem indicators through a project to better identify and develop new indicators and develop indices that combine multiple indicators. This work will also help to refine the coordinated monitoring program and facilitate communication of progress toward ecosystem recovery.
7. Coordinate various integrated ecosystem assessment efforts for the Puget Sound ecosystem, including efforts by NOAA's Northwest Fisheries Science Center, Washington Biodiversity Council, and Puget Sound Nearshore Partnership.
8. Explore historical data and develop projections of future scenarios, for some key issues, to examine how ecosystem conditions and threats change. By describing historic conditions and projecting future conditions, scientists can improve understanding of how the ecosystem functions and how it might be affected by management actions.
9. Conduct spatial analysis to evaluate current ecosystem status and the primary threats and drivers affecting desired ecosystem outcomes. This analysis should allow evaluation of the relative importance of threats and drivers and of the geographic distribution of threats and impacts across the ecosystem.
10. Design and implement studies to collect new information about a) the effects of a nearshore restoration actions, b) watershed-wide loading and effects of runoff, c) stressors affecting forage fish and pelagic food webs, and d) ecosystem services and socioeconomic indicators. These studies will demonstrate the benefits of studying management actions and provide important and urgently needed results to questions about how the ecosystem functions and how it is affected by management actions.
11. Assemble and synthesize findings in mid-2009 to describe ecosystem conditions and threats for 2009 State of the Sound. Conduct peer review of science contributions to 2009 State of the Sound.
12. Commission lead authors for various sections of science update report and encourage peer contributions and open peer review.

13. Publish 2010 Puget Sound Science Update to provide best available answers about how the ecosystem works, how it has changed over time, and how it is affected by management actions.
14. Develop long-term plan for future scenario modeling, describing the roles and responsibilities of collaborators in carrying this work forward.
15. Identify research priorities, including exploration of emerging trends, and recommend topics for Partnership sponsored science in 2011-13.
16. Create a framework for scientific experts to train and advise education and outreach specialists and networks.
17. Pursue establishment of a Puget Sound science intern and fellowship program.
18. Develop a process for soliciting science projects via competitive requests for proposals.
19. Develop processes for conducting peer review of materials that form the science basis for Partnership decisions.
20. Establish a process for external peer review of the Partnership's science program.
21. Develop working groups to support implementation of the Partnership's science program.
22. Evaluate state and federal agency science programs and initiatives, and understand and communicate how programs and initiatives contribute to Partnership science program needs. Recommend ways to adapt agency programs and initiatives to better align with Partnership interests.

**E.4 Increase and sustain coordinated efforts for communications, outreach and education to increase public awareness and encourage individual stewardship.**

Public opinion research confirms that while a majority of residents highly value Puget Sound, current awareness and concern about its decline is low. For citizens to understand their stake in protecting and cleaning up the Sound and the opportunities to help, awareness of the problem must substantially increase and be maintained over time. Greater awareness, along with citizen support for policy and behavioral changes, is critical for successful recovery and protection of Puget Sound.

*E.4.1 Implement a long-term, highly visible communications effort to increase public understanding of the threats facing Puget Sound and engagement in reducing personal impact.* The Partnership communication strategy is designed to a) raise broad public awareness regarding the health of Puget Sound, b) turn public awareness into individual citizen actions and behavior change, c) build and sustain a long-term coalition of diverse interests working together to protect and restore Puget Sound, and d) focus messages on priority solutions.

E.4.1.1 Create focused communications messages for audiences.

E.4.1.2 Coordinate communication efforts and behavior change messages Sound-wide.

E.4.1.3 Deliver communications through a variety of mediums including, but not limited to direct communications, presentations to associations and civic groups, news media, paid media, and grassroots outreach.

E.4.2 *Expand and sustain local volunteer, steward, and educators' programs focused on Action Agenda priorities to increase participation rates and improve efficiency of communications efforts.* Volunteering is one of the most effective ways for the public to engage directly in protecting and restoring Puget Sound. Thousands of volunteers are already working hard, but their efforts and programs are not well coordinated. A better-coordinated approach will be necessary to harness existing and add new volunteer energy in Puget Sound.

E.4.2.1 Use the existing Education, Communication and Outreach Network (EcoNet) to continue to coordinate education, outreach and volunteer efforts.

E.4.2.2 Use the Education Working Group of federal, state and local agency representatives to coordinate related policy and grant efforts.

E.4.2.3 Provide an easy-to-access, coordinated network of local volunteer activities to Puget Sound residents. The network will include opportunities for restoration, "citizen science", and outreach. *— common inside quote*

E.4.2.4 Provide coordinated technical assistance and training to volunteer efforts focused on consistent messages and up-to-date scientific and technical information as well as scientific protocols.

E.4.3 *Strengthen K-12 environmental programs to improve long-term understanding of Puget Sound issues and solutions.* This effort will build on and tie into existing efforts. Outdoor learning centers and other educational opportunities can help increase project-based learning and community partnerships, and help ensure long-term stewardship and support for Puget Sound protection and restoration by future generations.

E.4.3.1 Provide a "Meaningful Watershed Education Experience" to all primary, middle and high school students in Puget Sound. Teacher training, project-based learning, and outreach will be needed.

E.4.3.2 Include Puget Sound-related environmental, social and economic issues in curriculum.

#### **E.4 Near-term Actions**

1. Research and develop targeted communications messages for audiences.
2. Expand efforts to improve coordination of communication efforts and behavior change messages across government agencies and interest groups, such as STORM.
3. Deliver regular communications to a variety of audiences and through a variety of mediums.
4. Conduct a pilot program with the Washington state ferries to educate riders about the condition of Puget Sound and actions they can take to help.
5. Develop a Puget Sound Partnership volunteer and outreach grant to sustain and expand effective and successful volunteer opportunities.

*Has font of financial discussion changed?*

## **The Financing Approach**

The scope and complexity of the work required to reach our 2020 Puget Sound recovery goals requires actions be undertaken incrementally, strategically and comprehensively. The Action Agenda will be adaptively managed with incremental changes in actions based on their cost and effectiveness. The Action Agenda is also strategic, picking actions that align with strategic priorities.

The finance strategy is also built around the same incremental and strategic approach. Funding sources will be expanded as actions are proved and important building blocks are completed. It will also be strategic, ensuring that every dollar, existing and new, is spent to full advantage. Existing funding sources have been screened and evaluated for degree of support to the Action Agenda. The Partnership has also begun to work collaboratively with the agencies that control existing funding programs to ensure that public and private money is optimally aligned to support the Action Agenda. The Partnership has also identified potential new sources of funding, such as enhancements to public loan programs and incentives that leverage maximum environmental benefit and non-traditional sources of funding.

An incremental, strategic approach will ultimately lead to a comprehensive finance strategy that will encompass traditional and non-traditional resources to fully implement all of the actions necessary to reach our 2020 Puget Sound recovery goals.

## **How Much Will Our Actions Cost?**

The Action Agenda recommends several types of actions, including: capital projects; regulatory programs and adjustments; incentives; scientific research, and education and outreach programs. Methods for calculating the costs for each of these actions vary. Some actions, such as estuary restoration projects, have detailed cost estimates already prepared. Similarly, if an action involves an adjustment to an existing program, such as the acceleration of shoreline planning, good cost estimates are available. Other actions, however, do not have detailed cost estimates prepared. In those cases, unit costs of similar work or other methods were used to provide an initial estimate.

Initial cost estimates for implementing essential actions in the 2009-2011 biennium range between \$200 million and \$300 million. This estimate covers the cost of additions or adjustments to existing projects or programs as well as new actions. It does not include the cost of existing programs that are already being implemented.

The estimate will be refined after the draft Action Agenda has been reviewed and after the Leadership Council has provided direction on priority actions for initial

## State Government

- Per existing law, all agencies should identify budget priorities in consultation with the Partnership and seek funding for priority Action Agenda items in the biannual appropriations process.
- State grant-making agencies, including the Salmon Recovery Funding Board, the Department of Ecology and the Recreation and Conservation Office, should consult the Partnership and integrate Action Agenda priorities into grant funding.
- The Partnership should: take the lead in coordinating the implementation of the funding strategy; track progress on achieving funding goals; and modify the strategy as needed to improve performance.
- The Department of Ecology, working with the Partnership and other stakeholders, should create of a water quality trading framework and policies, as well as the development of the in-lieu-fee mitigation program.
- State agencies with capital project responsibilities, including the Department of Transportation, should use the Puget Sound in-lieu-fee mitigation program to fulfill mitigation needs.

## Local Government

- County and city governments should support the design and establishment of a Puget Sound improvement district to collect and distribute funding for Action Agenda priorities.
- County and city governments, working with salmon and watershed recovery groups, should prioritize Action Agenda projects in local capital improvement and grant programs.
- County and city governments should modify policies and regulations as needed to support the regional in-lieu-fee and water quality trading programs.
- County and city governments should support Action Agenda priorities in state and federal budget processes.

## Private Sector

- Environmental and community groups should support Action Agenda priorities in local, state and federal appropriations processes.
- Environmental groups and land trusts should continue providing private funding for conservation and restoration projects consistent with the Action Agenda.
- Private landowners should continue to take actions on their property that are consistent with Action Agenda priorities.



**San Juan Islands Conservation District**  
**350 Court Street #10, Friday Harbor, WA 98250**  
**360-378-6621**  
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**Puget Sound Partnership**  
**Action Agenda Task Force**

**November 19, 2008**

Dear Task Force Members -

We appreciate the opportunity to give feedback on the Puget Sound Partnership Action Plan. Note that the San Juan Islands Conservation District has as a long track record of providing technical assistance and best management practices through farm/forest planning and has more recently been providing site assessments focusing upon watershed functions, native plant communities, water quality, and low impact development. These efforts result in **DIRECT CONTACT** with **PROPERTY OWNERS** and **ON-THE-GROUND IMPROVEMENTS** to water quality, water quantity, and wildlife habitats that directly improve the health of the Puget Sound ecosystem (or the Salish Sea, as we prefer to call our receiving waters).

In addition, we are a respected community resource for providing public outreach that includes workshops on conservation and stewardship methods. We partner closely with other natural resource agencies and organizations, and have given technical input to a long roster of San Juan County planning efforts, including the Marine Stewardship Area Plan, Salmon Recovery Plan, and the WRIA 2 Watershed Management Plan.

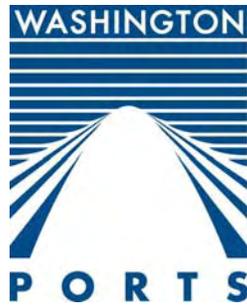
In order to continue and improve upon these and other efforts we need the PSP Action Plan to include the following:

- **STABLE, LONG-TERM FUNDING** for core programs! Relying on grant funding that changes program focus and staff every two years creates chaos for the CD and the public – we need stable funding to **WORK WITH LANDOWNERS IMPLEMENTING BMPs** that directly improve the health of terrestrial and marine waters.
- **BASELINE DATA** for San Juan County! We still have a chance to **PROTECT** resources and we need to know what we have in order to develop reasonable protection efforts – a remote sensing based analysis verified by field visits and translated into **user friendly** GIS layers would be most helpful; the CD is a possible “data central” for local information.
- Funding to provide **COST SHARE INCENTIVES** directly to landowners interested in doing the right thing by installing BMPs and/or changing behaviors.
- Funding to continue and expand our 5-year water quality monitoring program (the **ONLY** county wide ‘long term’ water quality data collection effort in San Juan County).
- Funding support for staff to participate in the implementation of tasks called out in the WRIA 2 Watershed Management Plan, Salmon Recovery Plan, and Marine Stewardship Area Plan; same for CD staff participation in additional planning efforts (example the ongoing Critical Area Ordinance update and the upcoming Shoreline Master Plan update).

Thank you for making sure these specific items are reflected in the PSP Action Plan.  
 Respectfully,

Vicki Heater  
 Supervisor, Secretary-Auditor  
 San Juan Islands Conservation District

*"When we see land as a community to which we belong,  
 we may begin to use it with love and respect" - Aldo Leopold*



November 18, 2008

Mr. David Dicks  
Executive Director  
Puget Sound Partnership  
P.O. Box 40900  
Olympia, WA 98504-0900

Dear Mr. Dicks;

This is a comment letter from the Washington Public Ports Association (WPPA) on the Puget Sound Partnership's (PSP) DRAFT Action Agenda for Puget Sound. We appreciate the opportunity to have participated in the process to date as a part of the Ecosystem Coordination Board. Puget Sound's Ports are prepared to work with and support the Partnership to successfully implement an effective Action Agenda.

By definition, ports and the citizens who depend upon them live and work on Puget Sound, and we join the Partnership in its desire to restore Puget Sound to health. Our seaports also compete in the world's global economy. Whether moving fruit and grain, logs and finished lumber, airplane parts and computer components, airline and cruise travelers; or locating clean and "green" industries in our home towns, ports must remain economically successful in order to contribute to the restoration of a healthy Puget Sound.

We understand the importance of a healthy sound to the quality of life and economic vitality of the region. The sound's restoration will not come without costs and new investments. Ports are uniquely positioned to help create the good jobs and associated revenue that we all need to rebuild a healthy sound.

The importance of a vibrant port system is recognized throughout the draft action agenda as a valuable contribution to our ability help restore a healthy sound.

In addressing the core question, "What is a healthy Puget Sound (and how do we know if we're moving towards one)?" the draft understands that the sound is an "economic engine" and acknowledges the contribution of maritime commerce to our state's wage base, small and large businesses, and local governments. The activities of ports—large and small—fuel that engine.

The draft agenda's top priority, "A. Protect Intact Ecosystem Processes, Structures, and Function," calls on us to focus growth away from ecologically important and sensitive areas by encouraging dense compact cities and vital rural communities." Priority A also speaks to the need to "Revitalize waterfront communities while enhancing marine and freshwater shoreline environments...*Restore urban waterfront areas and communities in a manner which complements functioning shoreline ecosystems.*" We support these priorities.

In today's world, every port development or redevelopment project-- whether through the removal of old creosote piling, eliminating contaminated sediments from the nearshore marine environment, reducing overwater shading, or creating new functioning habit areas-- contributes to a healthier sound.

Puget Sound's ports are already situated in the densest and most developed parts of our cities and towns. Port activity is concentrated in Constitutionally-protected Harbor Areas, and this vibrant economic activity is necessary for the restoration of a healthy sound. The economic engine that will drive the sound's restoration depends on maintaining and enhancing vibrant port economic activity.

Today, ports are taking, and will continue to take actions in support of Puget Sound. These include, but are not limited to:

- cleaning-up highly contaminated areas;
- creating and restoring habitat;
- reducing air emissions;
- modernizing storm-water treatments;
- working with tenants to implement best environmental management practices;
- modernizing marinas and working with boaters to minimize boating impacts; and
- reaching out to our communities to support local activities that benefit the Sound.

The draft agenda contains many potentially positive ideas for ports, including:

- a sense of opportunity sobered by urgency;
- setting and communicating the priorities for regaining a healthy sound;
- the use of good science to make decisions;
- a call to provide the technical and financial assistance local governments need to develop and adopt thoughtful plans and take reasoned actions; and
- understanding the need for permitting and regulatory efficiencies.

Other synergies are likely to emerge as we become more familiar with the proposal.

Because our seaports compete in a global economy, it is very important that we craft policies for the Action Agenda that recognize our competitive pressures. Some of the action items that have been proposed need to be very carefully tailored in order to attain our shared objectives of a healthy Puget Sound and a vibrant, thriving working waterfront. These include:

- state actions that might unnecessarily send economic activity to Canada, California or Mexico and limit port contributions to the Puget Sound recovery—for example a new ballast water treatment regime specific to our state;

- unnecessary restrictions on new in-water developments or redevelopments without scientific basis;
- additional, nonspecific and unfocused regulations that might delay good business and restoration actions; and
- the diversion of funds from the Model Toxic Control Account that is already helping the Sound.

WPPA’s specific comments on the draft are provided below in the order they were presented in the preliminary rankings document.

A. “Protect Intact Ecosystems, Processes, Structure and Function.”

- A2.5. speaks to the need to provide local governments the technical and financial support that they need in order to update their shoreline management programs in a timely manner. This need was also identified in the reports of all the Partnership’s Action Areas. Thoughtful, understandable shoreline programs are essential to efficient port operations and the ability to make sound maritime infrastructure investments, and we support this plan element. An appropriate funding stream needs to be identified for this action.
- A5.1 & A5.2. look at the issues of ballast water standards and the need to prevent and control the spread of invasive species. A5.1 calls for the development of national, or at least West Coast, ballast water discharge management standards. This is an appropriate approach and is supported by the Puget Sound’s ports. A5.2, on the other hand, speaks to creating ballast water programs specific to the State of Washington and Puget Sound. The implementation of such restrictions would place our state at competitive disadvantage, and subsequently diminish ports’ ability to contribute to restoration. The WPPA does not support the approach outlined in A5.2.
- A2.7 seems intended to speak to issues associated with residential shoreline development. (“New overwater structures or shoreline hardening in the vicinity of forage fish spawning areas should also be restricted.”) As written, this section could have negative impacts on port maintenance and development actions. Additional clarification on the intent and implications of this section is needed.
- A2.6 , like A2.5, acknowledges, and correctly speaks to, the need to provide adequate technical resources to local governments. An appropriate funding stream needs to be identified for this action.
- A2.4 deals with the Marine Management Areas Work Group and establishment of Marine Protection Areas. Ports will closely monitor this action, should it be adopted, in order to ensure that these areas operate in a manner that complements our ports.

B. “Restore Intact Ecosystem Processes, Structures, and Function”

- B1.3 calls for the investigation and implementation of effective nearshore restoration opportunities. Ports are currently engaged in substantial habitat restorations and are uniquely positioned to contribute to this goal and we support this agenda item.

- B2.2 & B2.1 deal with planned clean-up activities in Bellingham Bay and Port Angeles Harbor respectively. Each of these initiatives are important state/local partnerships that, if properly implemented, will result in a healthier Puget Sound and vibrant local waterfronts. We support these priorities.

#### C. “Reduce the Sources of Water Pollution”

- C2.4 & C2.3 relate to the potential of using “low impact development” (LID) to improve stormwater management in the Puget Sound region. C2.4 looks at incentives and removing barriers to low impact developments. C2.4 appears to seek regulatory requirements for low impact development through local stormwater codes. Low impact development is being employed by some ports, and can be an important tool to improve stormwater treatment. In order to be most effective, LID needs to be better defined and incentives for its use provided. Simply making it a regulatory requirement will lessen its potential benefits. Puget Sound’s ports will closely follow the planning, incentives, and code requirements associated with this concept.
- C1.3 advocates for permanent federal funding for a rescue tug at Neah Bay. As with many of the proposals in the draft Action Agenda, the source of this funding is key. Because of the discretionary nature of the non-petroleum cargo that we import and export, it will be critical to ensure that the maritime industry does not bear a responsibility for funding this item when additional, more cost-effective solutions exist.
- C2.6 discusses the setting of priorities for stormwater treatment retrofits. If this is pursued, strict criteria need to be established for priority-setting. Ports will closely monitor the work on this action if it is adopted by the PSP.
- C1.4 proposes expanding the authority of the Department of Ecology to board and inspect vessels. The Coast Guard has virtually unlimited authority to board and inspect vessels. With Coast Guard permission the state can participate in such actions. Simply affording the state the opportunity to board any vessel at anytime, anywhere, for any reason would affect legitimate port operations and interfere with trade and commerce. We do not support this concept.
- C1.5 asks EPA to establish Puget Sound as a ‘no discharge zone’. The proposal does not discuss the infrastructure necessary to handle treated discharges. Some vessels (i.e. regularly scheduled cruise ships traveling between Seattle and Alaska) are allowed to discharge in accordance with strict Coast Guard regulations and an agreement among the cruise industry, Department of Ecology, and Port of Seattle. A blanket ban on discharges would not only have operational impacts, but it would eliminate the use of protective, state-of-the art marine treatment systems. In addition, this concept is likely to relate to recreational boating, and to the marinas and shore facilities that support boating. If this concept is pursued, it is imperative that the Partnership and the Department of Ecology work very closely with the affected boating groups and marinas in order to ensure workable, cost-effective and necessary proposals.

D “Work Efficiently and Effectively Together”

- D3.4 calls for the establishment of a new Federal Puget Sound Office. The momentum and responsibility for restoring the health of Puget Sound rests with the individuals, communities, local governments including ports and the state. These are the people who live and work around the sound. It’s unclear that the addition of a new level of federal regulation would enhance our ability to succeed.
- D4.3 acknowledges the need for more efficient permitting of developments that can aid restoration. Today, a development or redevelopment project that could help the Sound’s health can easily take 3-5 years to permit. During that time, the proposal’s benefits to Puget Sound go unrealized. We support permitting efficiencies for projects that promote the economy, create jobs, and benefit Puget Sound.
- D4.3 supports funding and legislation to support state and local governments’ work under the State Environmental Policy Act (SEPA). As SEPA lead agencies, ports understand the value of environmental review in project decision-making and support this concept.

The draft Action Agenda also identifies the critical need to finance the restoration of a healthy Puget Sound. Among the options discussed is the diversion of up to \$40 million from the State’s Model Toxic Control Account. This program is working today to help clean-up areas that are impacting Puget Sound. Diverting these funds will not improve cleanups, and therefore we cannot support this concept. In addition, it is likely that initially-forecast budget ‘surpluses’ will not materialize, due to the volatility of these accounts. This makes it even more important that Local Toxics Control Account funds, in particular, be used for priority cleanups.

Thank you for the opportunity to review and comment on the draft Action Agenda. Please contact me if you have any questions or would like more information. The Ports of Puget Sound look forward to continuing our solid relationship with the Puget Sound Partnership as we build an Action Agenda that restores this vibrant, multi-faceted inland waterway.

Sincerely,



Eric D. Johnson, Deputy Director  
Washington Public Ports Association

c: John Calhoun, Ecosystem Restoration Board