

Comments on the Draft 2012 Action Agenda Revision
U.S. Fish and Wildlife Service, Washington Fish and Wildlife Office
Compiled by Tom McDowell
Contributions from Judy Lantor, Ginger Phalen, Jay Davis
February 3, 2012

First, we want to thank you for the work you are doing to lead the development of a strategic plan for restoring Puget Sound and for focusing on the watersheds that feed it.

We would also like to highlight that the U.S. Fish and Wildlife Service continues to make meaningful contributions to the recovery of Puget Sound through various programs administered from our Washington Fish and Wildlife Office as well as from our Regional Office in Portland, Oregon and our national office in Washington D. C.

For example, here at the Washington Fish and Wildlife Office in Lacey, we have refocused our Puget Sound Coastal Program on Puget Sound. Previously we had devoted a small proportion of our staff's time in Southwest Washington, specifically Willapa Bay. We made this change to contribute to the restoration momentum building in Puget Sound.

Also, our Washington Fish and Wildlife Office continues to devote significant staff resources to the development, with our state partners, of grant proposals for our National Coastal Wetlands Conservation Grants program, which is run out of our Regional Office. For example, this year through Service's National Coastal Wetland Conservation Grant program, nine high priority protection and restoration projects will receive over \$7.41M to protect and restore 1,127 acres of coastal habitats and over one mile of shoreline in Puget Sound.

Prairie and Oak Woodland Habitats

In the Action Agenda it is noted that prairie habitats have been reduced greatly from historic levels. We note that prairies and oak woodlands contribute to the ecological diversity of the Puget Sound basin and the Pacific Northwest. Prairies are mentioned only 3 times in the document and oak woodlands do not appear to be mentioned at all. Therefore, we recommend incorporating more information on prairies and oak woodlands into the revised Action Agenda to emphasize the importance of these habitats to maintaining overall species diversity. Please feel free to use the language below should you wish.

The Puget Trough physiographic province is one of the most ecologically diverse and productive ecosystems in the western United States. The Puget Trough was formed by

glaciers during the last ice age, about 15,000 years ago. Prairies in this region are underlain with outwash from the retreating glaciers. The gravelly, well drained soils were a major factor in creating prairies and oak woodlands.

The native prairie ecosystem is composed upland prairies, wet prairies, oak savanna and woodlands, wetlands and associated streams throughout western Washington.

Upland prairie is important habitat for a variety of unique plant and animal species. A number of species are dependent upon this habitat, including the federally listed golden paintbrush (*Castilleja levisecta*). Other candidates and species of concern find optimum habitats on prairies in the Puget Sound region, including several subspecies of Mazama pocket gopher (*Thomomys mazama*), streaked horned lark (*Eremophila alpestris strigata*), butterflies including Mardon skipper (*Polites mardon*), Taylor's checkerspot (*Euphydryas editha taylori*), valley silverspot (*Speyeria zerene bremeri*), and Island marble (*Euchloe ausonides insulanus*); and the Oregon vesper sparrow (*Pooecetes gramineus affinis*), white-topped aster (*Sericocarpus rigidus*), and western gray squirrel (*Sciurus griseus griseus*).

Garry oak woodlands and savannas are used by an abundance of mammals, birds, reptiles, and amphibians. Many invertebrates, including various moths, butterflies, gall wasps, and spiders, are found exclusively in association with this oak species. Oaks are an important component in the conservation of neotropical migrant birds that migrate through, or nest in, Garry oak woodlands. Garry oak woodlands are also at the northern extent of their range in western Washington and southern British Columbia and will be important stepping stones to allow for northward migration of species with climate change.

We applaud goal A1 - Focus land development away from ecologically important and sensitive areas. We want to make sure that prairie and oak woodland habitats are fully considered in efforts to identify ecologically important and sensitive areas. It would be quite unfortunate if development were driven toward prairie and oak woodland habitats as a result of efforts to protect sensitive habitats more closely associated with salmonids.

Federal Contributions to Puget Sound Recovery

Overall it seems the Action Agenda has limited information on Federal Agency involvement and support, or tasks and expectations. We believe it is important to note what federal programs are contributing, so that a fuller picture of efforts is reflected.

It might be beneficial to have a table or appendix of important state and federal funding sources that support the Action Agenda - a comprehensive list with short descriptions somewhere in the document.

This would make it clear what other state and federal funding sources are currently being used to support Action Agenda items, and are an important part of assisting with goal implementation.

Some Specific Comments

Executive Summary - Pg. 8: At the Federal Level: we feel that continued support for Federal Grant programs that support Action Agenda goals would be important.

Full Document - Pg. 98: Funding sources textbox: The state funding provided by these programs also serves as match funding for federal grant programs such as NOAA's Coastal and Estuarine Land Conservation Program, FWS's North American Wetland Conservation Act Grant Program, National Coastal Wetlands Conservation Grant Program, and the Cooperative Endangered Species Fund Grant Programs. These national programs support the goals of the Action Agenda through conservation and protection of coastal nearshore habitat and terrestrial upland habitat, and provide increased habitat for federal and state T & E species.

Marine, Freshwater, and Upland Birds

Although the decline of marine birds is noted as an issue in the document, we could not find any strategies that address this decline, or any acknowledgement that marine birds will benefit from conservation and restoration actions noted in the Marine and Nearshore sections.

Same comment for the terrestrial and freshwater wetland section for upland bird species and waterbirds that are more dependent on functional freshwater wetlands, swamps and marshes.

Comments on Strategies and Near-Term Actions

Potential Suggestion for Initiative/Strategy: A Coastal and Marine Nearshore Retreat Initiative: introduce retreat as an option for coastal landowners. This could be an State/Federal incentive program either through SMP implementation or FEMA/NOAA/FWS/ Local and trusts, that could work with interested coastal bluff and other nearshore landowners Coastal spits/embayments) that are willing to have their house moved back out of the zone of impact, and restore habitat, or have a life estate on their property with the end point being structure removal and restoration of habitat. This would address future issues with sea level rise, other climate change impacts, and also provide more public access to the Puget Sound shoreline. Areas could be prioritized using the Cereghino strategy document, species recovery plans, PSNERP information, or habitat/ecosystem process benefits.

A10.1 NTA 1: Implementation of species recovery plans and creation of a Fish and Wildlife Action Plan for Puget Sound would benefit from federal involvement from FWS and NOAA.

A10.1 NTA 2: It should be noted that FWS and NOAA also prioritize implementation of restoration and recovery projects identified within species recovery plans.

A10.1 NTA 3: Coordination with FWS/NOAA should be encouraged or noted here.

B.2.1 NTA1: The "who" for this task could be WDFW/WDNR through implementation/funding from EPA for the Marine and Near shore Component. WDOE/WDFW/WDNR/WSP/Tribes can access State and FWS/NOAA Coastal federal grant programs for this type of habitat protection.

B.2.4 NTA 3: Opportunity for Federal regulatory agency engagement in development of overwater structure guidance.

B3. Text section Pg. 134: Include FWS in Federal Agency bullet.

B3.1 NTA1: The "who" for this task could be state, federal, tribal, and local agencies and organizations who have made the commitment to work on PSNERP, and who are interested in seeing the projects through to construction, either through ACOE or other local/state/federal/tribal efforts.

B.3.2 NTA 1/2: The "who" could be WDNR/WDFW through implementation/funding from EPA for the Marine and Near shore Component. NOAA and FWS could assist with this through Coastal Program restoration funding - although the "loan" concept would not mesh with the federal restoration funding programs as they are currently implemented.

B3.4 NTA 1/2: both of these strategies could be expanded to include other state and federal agency managed lands in Puget Sound.

B.5.1 NTA 1: This strategy is currently being addressed through a variety of state/federal coastal acquisition and restoration grant programs.

B7.2.1 NTA 1/2: It should be noted that FWS and NOAA also prioritize implementation of restoration and recovery projects identified within species recovery plans.

Environmental Contaminants

You have done a good job of highlighting environmental contaminants in the Action Agenda as a topic requiring additional research and action. We would like to emphasize that the effects of environmental contaminants need to be addressed with regard to protecting fish and wildlife resources themselves. We feel the Action Agenda could emphasize this better. For example we know that spawning coho salmon are adversely affected during their spawning life stage in some urban streams. We recommend a few edits to better emphasize this in the Action Agenda:

Pg. 5 of the Executive Summary; Table 1; Toxics; first bullet: "Implement studies to ensure that Washington State's water quality standards and sediment management standards are protective for

allowing human and wildlife consumption of fish and other seafood.” We recommend adding: “and protective of fish and wildlife resources themselves” to the end of this sentence.

Pg. 5 of the Executive Summary; Table 1; Runoff from the Environment; bullet 5: “Evaluate individual and combined effects of commonly used pesticides **and other toxins** on salmonids, other fish, and their foods.” Please consider adding the bold text.

Pg. 27 of the Executive Summary; Strategy C1.1; NTA#6: “. . . (2) effectiveness of strategies and actions to reduce and prevent toxic chemicals from entering the Puget Sound environment **and from affecting aquatic life.**” Please consider adding the bold text.

We request that you make similar edits throughout in the Action Agenda as necessary.

Should you have any questions regarding these comments, please feel contact Tom McDowell at 360-753-9426 or via email at tom_mcdowell@fws.gov.