

Date: January 13, 2012

To: Gerry O’Keefe, Director
Puget Sound Partnership

From: Robert Duff, Chair
Puget Sound Ecosystem Monitoring Program *Steering Committee*

Subject: Comments on:
2012 Action Agenda Update and Draft 2011-2013 Biennial Science Work Plan

Dear Mr. O’Keefe:

Thank you for the opportunity to provide comments on the 2012 Update to the Action Agenda and Draft 2011-2013 Biennial Science Work Plan (BSWP). On behalf of the Puget Sound Ecosystem Monitoring Program (PSEMP), we understand the importance of both these documents to the protection and recovery of Puget Sound.

As you know, PSEMP was only recently formed by the Leadership Council, building from a long history of monitoring in Puget Sound including the earlier Puget Sound Assessment and Monitoring Program (PSAMP) as well as many individual monitoring efforts implemented by agencies, tribes, and private organizations across the region. Our Steering Committee, comprising 23 different agencies, governments, and organizations across Puget Sound, first convened in June 2011. Since then, we have successfully adopted by-laws, elected a chair and vice-chair, scoped and commissioned seven technical work groups, provided the data and results for the Dashboard of Environmental Indicators, and began drafting a work plan and guidance that will lead to a better overall understanding of monitoring priorities across Puget Sound by year’s end.

It is important that the Action Agenda and BSWP recognize the importance of monitoring, and we are gratified to see a number of such references throughout the two documents. Monitoring is the mechanism that provides the actual data required to both target and track the effectiveness of the actions recommended by these plans. Monitoring also allows the Partnership to improve adaptive management of Puget Sound at both local and regional scales, and it provides an on-going and objective record of the condition, status, and changes over time of key ecosystem components and attributes- including the environmental indicators and recovery targets recently adopted by the Puget Sound Leadership Council.

We note, however, that as presently written monitoring is addressed unevenly throughout the Action Agenda in particular. For example, there are a number of Near Term Actions calling for very specific monitoring programs (*e.g. pg 70 placeholder NTA for effectiveness monitoring of status and trends of floodplains; pg 76 mention of restoration project monitoring; pg. 82 effectiveness monitoring for mitigation sites, pg 109 monitoring for priority invasive species (and pg 159 separate mention of monitoring for invasive marine species); pg 117 project monitoring to implement adaptive management; pg 141 compliance monitoring for nearshore and marine protection; pg 263 freshwater beach monitoring; pg 264 monitoring effectiveness of water quality improvement projects.*) etc.

In some cases, these descriptions are confusing, unclear as to scale, or mix terms in unconventional ways (e.g. “effectiveness monitoring of status and trends”). And while each of these individual monitoring

programs may have merit, we note there are numerous other monitoring programs and monitoring needs not mentioned. Until we have time to complete our assessment and evaluation of monitoring across Puget Sound, we cannot objectively speak to the relative priority of any individual monitoring proposals. We are gratified that the Action Agenda references various monitoring efforts but note that it does not present a comprehensive look at what is needed. As PSEMP identifies gaps and priorities for monitoring, we have agreed, as noted in our charter, that the Dashboard of Puget Sound Vital Signs are a priority and so the Action Agenda can continue to link these indicators to the near-term actions proposed. However, we are also reviewing additional data sources that may provide a more comprehensive characterization of the indicators selected.

Given the importance of the Action Agenda in guiding future actions, and recognizing that we are currently in the process of developing a comprehensive monitoring strategy for Puget Sound, we recommend that references to specific individual monitoring actions add additional language that clearly ties those proposals to our (PSEMP) strategy, and use our Work Plan to update the near term actions in Section D. We are happy to work closely with you and your staff over the next few weeks to draft appropriate text. Of course, throughout the Action Agenda all references to our program should be updated with our new name: the Puget Sound Ecosystem Monitoring Program.

In submitting these overall comments, we anticipate that many of our monitoring partner agencies, tribes, and organizations will provide individual comments and suggestions on these draft documents. Collectively, we encourage you to strengthen the references to monitoring (particularly in Section D) to recognize its value and critical importance to the successful implementation of the recovery strategies, near-term actions, and science recommendations incorporated in these draft documents.

We request the Partnership continue to engage PSEMP as you develop the Action Agenda and the BSWP and implement the Open Standards process. We encourage you to strengthen and improve the consistency between the Action Agenda and BSWP, with clear, comprehensive and quantitative goals for recovery. Doing so will help us develop more effective and focused monitoring strategies and partnerships across Puget Sound that support both the Action Agenda and Biennial Science Work Plan.

Thank you again for the opportunity to review and comment on these two documents. If you have any questions or would like more information on this topic, please feel free to contact me (rduf461@ECY.WA.GOV; 360.407.6699) or Ken Dzinbal (ken.dzinbal@psp.wa.gov; 360.464.1222).

cc: Leadership Council Members
Puget Sound Science Panel
Ken Dzinbal, PSP
Monitoring Program Steering Committee Members