

Strait Ecosystem Recovery Network (Strait ERN) FINAL Comments on the 2012 Draft Action Agenda Dated: February 2, 2012

The following comments on the 2012 Draft Action Agenda are offered by the Strait Ecosystem Recovery Network (Strait ERN), recognized by the Puget Sound Partnership's Leadership Council as the Local Integrating Organization (LIO) for the Strait of Juan de Fuca Action Area (Strait Action Area). All of these comments are referenced by page numbers (both electronic and document), chapters, sections, and, where appropriate, sub-sections associated with the 2012 Draft Action Agenda.

Comments are provided as:

- **General Comments** - pertain to all or large portions of the draft document,
- **Change Requests** - Specific requests to make the necessary changes to the text,
- **Suggestions** - for improvement to either correct, add clarity or necessary detail to the text, and
- **Notes** - to keep the Puget Sound Partnership (Partnership) informed about possible changes associated with the Strait ERN Local Integrating Organization (LIO),

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General Comment: After reviewing the 2012 Draft Action Agenda, we noticed that many items within the document are missing (*e.g.*, "To be determined", etc.). Knowing this, the Strait ERN requests the opportunity to comment on these missing items, where appropriate and within the context of the entire 2012 Action Agenda document, as these items become available for review.

Chapter: How do we recover Puget Sound to health?

Page 28 (Document page 22)

Strategic Initiatives

General Comment: As the LIO for the Strait Action Area, the Strait ERN looks forward to working with the Partnership to both better understand and to help identify and implement Strategic Initiatives as part of the Action Agenda. To start that work, we propose that 5 of the 6 Strait ERN "packaged" Local Near Term Actions (LNTA) and the associated specific Priority Actions (listed within Appendix D, NTA Table), be included as part

of the example Strategic Initiatives listed within this section. In addition, the Strait ERN proposes that the broader needs of habitat protection should be considered, hence the addition of groundfish within the example Strategic Initiative titled “Protection of habitat in support of salmon *and groundfish* recovery” shown below. The Strait ERN “packaged” LNTAs proposed for inclusion here are listed below for convenience under the appropriate example Strategic Initiative:

- *Protection of habitat in support of salmon and groundfish recovery*
 - ✓ A6.1 LNTA 2 - Implement the Puget Sound Salmon Recovery Plans (Puget Sound Salmon Recovery Plan and Hood Canal/ Eastern Strait of Juan de Fuca Summer Chum Recovery Plan) through the tool of the 3-year Work Plans
 - ✓ A8.1 (*Note: LNTA number to be determined as per Change Request comment provided below under Appendix D, NTA Table, Page 493, document page 487*) - Instream Flow Rules (WRIA 17, WRIA 18 East, WRIA 18 West, and WRIA 19) - Adopt and/or implement Instream Flow Rules for WRIA 17, WRIA 18 East, WRIA 18 West, and WRIA 19
 - ✓ B2.1 LNTA 3 - Shoreline Master Program Updates, Implementation, and Intergovernmental Coordination (Jefferson County, Clallam County and cities of Port Townsend, Sequim, and Port Angeles)
 - ✓ C10.2 LNTA 1 - Oil Spill Prevention, Preparedness, and Response (*Note: See the Change Requests for this LNTA described below*) – Implement and promote improvements in oil spill prevention, preparedness, and response programs, policies, or capabilities for the benefit of the Strait of Juan de Fuca and adjacent waters
- *Prevention of water pollution from urban stormwater runoff*
 - ✓ C2.2 LNTA 6 - Stormwater Management Program Updates and Implementation (Clallam, Jefferson, Port Angeles, Sequim, and Port Townsend)

Further, we propose creation of an additional Strategic Initiative, one that focuses on “*Restoration of habitat in support of salmon and groundfish recovery*” to compliment the protection Initiative above. Again, the Strait ERN believes that the broader needs of habitat recovery, restoration in this case, should be considered, hence the inclusion of groundfish within this proposed Strategic Initiative. If such a Strategic Initiative is created, we propose that the following LNTAs and associated specific Priority Actions (listed within Appendix D, NTA Table) be included as part of this Initiative:

- ✓ A6.1 LNTA 1 - Elwha River Ecosystem Recovery
- ✓ A6.1 LNTA 2 - Implement the Puget Sound Salmon Recovery Plans (Puget Sound Salmon Recovery Plan and Hood Canal/ Eastern Strait of Juan de Fuca Summer Chum Recovery Plan) through the tool of the 3-year Work Plans

General Comment: We suggest that many of the other 19 additional Strategic Priorities (and associated specific Priority Actions) described within the Strait of Juan de Fuca Profile (see document pages 399-400) could also be considered as part of one or more of these Strategic Initiatives. For example:

- *Protection of habitat in support of salmon and groundfish recovery (Note: See the General Comment above regarding broader habitat considerations (i.e., groundfish))*
 - ✓ Aquatic Habitat Resource Conservation Plans
 - ✓ Carlsborg Wastewater Treatment and Water Reuse
 - ✓ Climate Change Mitigation, Adaption, and Implementation of Programs and Plans
 - ✓ Critical Areas Ordinances
 - ✓ Marine Resource Plans (Clallam and Jefferson MRCs)
 - ✓ Migration Corridor Integrity
 - ✓ Outreach, Education, and Public Involvement
 - ✓ Watershed Planning Detailed Implementation Plan Development and Implementation (WRIAs 19, 18 West, 18 East, and 17)
 - ✓ Working Lands and Tidelands Protection
- *Prevention of water pollution from urban stormwater runoff*
 - ✓ Outreach, Education, and Public Involvement
 - ✓ Watershed Planning Detailed Implementation Plan Development and Implementation (WRIAs 19, 18 West, 18 East, and 17)
- *Protection of water quality and nearshore habitat from rural and agricultural runoff*
 - ✓ Clean Water District Plans
 - ✓ Outreach, Education, and Public Involvement
 - ✓ Toxic Source Reduction Programs
 - ✓ Watershed Planning Detailed Implementation Plan Development and Implementation (WRIAs 19, 18 West, 18 East, and 17)
- *Restoration of habitat in support of salmon and groundfish recovery (Note: See new Strategic Initiative proposal above)*
 - ✓ Climate Change Mitigation, Adaption, and Implementation of Programs and Plans
 - ✓ Forest Practices
 - ✓ Marine Resource Plans (Clallam and Jefferson MRCs)
 - ✓ Non-Indigenous Species Programs
 - ✓ Outreach, Education, and Public Involvement
 - ✓ Port Angeles Harbor Ecosystem Recovery
 - ✓ Watershed Planning Detailed Implementation Plan Development and Implementation (WRIAs 19, 18 West, 18 East, and 17)

General Comment: Working with our Strait Action Area representative (and alternate) to the Ecosystem Coordination Board, how best can the Strait ERN LIO provide effective and timely input during the development of the Prioritization Framework?

Section: Upland and Terrestrial

Page 45 (Document page 39)

A1.4 NTA 1

Suggestion: The Strait ERN supported 2009 EPA funded Enhanced Shoreline Protection (No Net Loss) project sponsored by Clallam and Jefferson counties and Ecology may help to inform the direction of this NTA.

Page 51 (Document page 45)

Target View: Land Development (first paragraph)

Suggestion: Emphasize “working” forests within second sentence in this paragraph, namely “The needs for homes, office buildings, stores, and agricultural lands to support our lives must be taken into consideration as we strive to preserve working forests...”

Page 67 (Document page 61)

Local Strategies insert

Change Request: Add the following sentence: "Strait lists restoration of the Dungeness and Elwha River floodplains as two of the highest priority specific actions for their Salmon Recovery LNTA."

Page 74 (Document page 68)

A5.3 LNTA 2

Change Request: Change this LNTA to reference, more generically, important floodplain restoration projects across the Puget Sound. In addition to the projects already listed here for WRIA 8, 9, and 10, include reference to other floodplain restoration projects, including those important

to WRIA 18, namely, the Dungeness and Elwha River floodplains. These WRIA 18 floodplain projects are two of the highest priority specific actions within A6.1, Salmon Recovery, LNTA 2.

Page 84 (Document page 78)

A6.1 LNTA 2 Puget Sound Recovery Plans (NOPLS and HCCC)

Suggestion: Within the respective 3-Year Work Plans for the Strait's two Lead Entities are many important marine and nearshore and pollutant reduction actions. For this reason, it may be more appropriate to move this A6.1 LNTA#2 somewhere under strategy A9, the Action Agenda's Salmon Recovery Strategy. Alternatively, if this LNTA#2 remains under A6.1, it should be, at a minimum, specifically cross referenced somewhere under A9.

Page 91 (Document page 85)

Local Strategies insert

Suggestion: Include "adopting" within this sentence: "Specifically, the Strait identified adopting and/or implementing Instream Flow Rules for..."

Page 93 (Document page 87)

Local Action insert

Suggestion: Delete this entry as it seems redundant with the Local Strategies insert immediately above on page 85.

Section: Reduce and control the sources of pollution to Puget Sound

Page 215 (Document page 209)

Local Strategies insert

Suggestion: Add the Strait to this list. A number of the Strait's additional 19 Strategic Priorities would fit well under this Local Strategies highlight, namely, "Carlsborg Wastewater and Water Reuse Strategy", "Sewage Discharges (Treated and Untreated)", and "Clean Water District Plans"

Page 271 (Document page 265)

Emerging Issues and Future Opportunities

Suggestion: Either mention within this first text bullet or create a new "Local Strategies" insert to highlight the fact that the Strait has identified "Toxic Source Reduction Programs" as one of the additional 19 Strategic Priorities, including specific Priority Actions for Microplastics with the Port Townsend Marine Science Center, as the project sponsor.

Section: Strategic Leadership and Collaboration

Page 283 (Document page 277)

Local Strategies insert

Change Request: Delete this confusing and potentially misleading sentence: "The Strait has identified this as a non-priority, yet important strategic area as well". Formation of an LIO within the Strait Action Area is not a priority because it's already been accomplished! Replace this sentence with this one: "Continuation of the Strait's already formed and functioning LIO is an important part of its local strategy to implement the Action Agenda."

Page 295 (Document page 289)

Local Strategies insert

Suggestion: Add the Strait to this list. The Strait has already identified Climate Change as one of their 19 additional Strategic Priorities, namely "Climate Change Mitigation, Adaption, and Implementation of Programs and Plans". One of the specific Priority Actions listed for this Strategic Priority is support for "Outreach, Education, and Planning Efforts" related to local climate change related programs, projects, local ordinances, etc.

Chapter: How Are Local Areas Working to Protect and Recover Puget Sound?

Page 307 (Document page 301)

The Action Areas

Note: The Strait ERN Steering Group has recommended that the Strait ERN discuss the possibility of a name change to reflect their current work approach. This item may be discussed at a near future quarterly meeting of the Strait ERN.

Section: The Action Agenda in the Strait of Juan de Fuca

Page 402 (Document page 396)

Profile

Suggestion: Add reference to Clallam and Jefferson counties and the Olympic National Forest to this sentence: “It is home to the Makah, Lower Elwha Klallam and Jamestown S’Klallam Nations and tribal reservations, Clallam and Jefferson counties, and the cities of Port Townsend, Port Angeles, and Sequim, and much of Olympic National Park and Olympic National Forest.”

Pages 402-403 (Document page 396-397)

Port Angeles Mill reference

Suggestion: Actually, the largest mill within the Strait Action Area is a paper mill, not a lumber mill. We suggest making the following changes to the text: “In other places, commercial timber harvest remains an important economic sector, supporting an active paper mill in Port Angeles.

Page 403 (Document page 397)

Notable Accomplishments insert

Suggestion: Correct the spelling for the Pysht River, not Pshyt. Also, eliminate the errant spaces within this sentence.

Page 403-404 (Document page 397-398)

Elwha River reference

Suggestion: Change this sentence to the following: “The largest dam removal project in US history will reopen more than 70 miles of mostly

pristine spawning and rearing habitat in the Elwha River and its tributaries.”

Page 404 (Document page 398)

Local Action Agenda Process

Suggestion: Correct the typographical error: “...undertook an extensive...”

Change Request: Change the text within the last sentence of this paragraph to read the following "Using the threats as an internal guide, the Strait ERN identified...".

Key Threats/Pressures

Change Request: As agreed by the Strait ERN at their June 6, 2011 quarterly meeting, ranked local threats were to only be used internally by the Strait ERN as a guide and not considered absolute, hence they should not be specifically cited here in ranked format. Alternatively, these threats can and should only be listed and referred too alphabetically within the 2012 Action Agenda. In addition, the following sentence needs to be included in reference to the alphabetical listing of these local threats: “The Strait ERN reserves the ability to act upon each threat as the occasion arises.”

Page 405 (Document page 399)

Opportunities, Priorities, and Near Term Actions (additional 19 strategic priorities)

Suggestion: Where appropriate, utilize these additional 19 Strategic Priorities to more fully populate the highlighted "Local Strategies" insert boxes within the Puget Sound regional portion of the Action Agenda. Examples of such are inserted as Suggestions within the comments above.

Page 406 (Document page 400)

Outreach, Education, and Public Involvement bullet

Suggestion: Typographical error - “C. BuiltGreen™” should be shown in bold type.

Priority NTA Table

“Packaged” Priority NTA column

Suggestion: Consider using small letter designations, instead of bullets, for each of the specific actions listed under each "Packaged" Priority NTA within the first column of this table, as a better cross reference to the Strait ERN 2011-13 Biennial Work Plan.

Elwha River Ecosystem Recovery (ID #6) - Performance Measure entry

Suggestion: To avoid sending the reader to another document for clarification, using small letter designations for the specific actions listed under the first column, as suggested above, would allow for inclusion of specific references to actions 6a and 6b as part of this Performance Measure for this “packaged” NTA. This was already done for most of the subsequent Performance Measure entries within that column.

Salmon Recovery Plans (ID #18) - Performance Measure entry

Suggestion: Again, to avoid sending the reader to another document for clarification, using small letter designations for the specific actions listed under the first column, as suggested above, would allow for inclusion of specific references to actions 18b, 18c, 18d, and 18e, as part of this Performance Measure for this “packaged” NTA. This was done for most of the subsequent Performance Measure entries within that column.

Oil Spill Prevention, Preparedness, and Response (ID #15)

Change Request: Remove all of the existing specific Priority Actions listed as bullets under this “packaged” LNTA and replace them with the following:

- Neah Bay Vessel of Opportunity Program,
- Expansion of oil spill drills along the Strait and Coast, and
- Improved Trans-boundary coordination on oil spills.

All of the other Priority Actions previously submitted by the Strait ERN within the Strait ERN LIO Template in September 2011 for this “packaged” LNTA are now considered by the Strait ERN to be either essentially completed or “ongoing” actions in need of continued support.

Change Request: Remove the existing entry for the “Possible Lead, Government, Agency, or Organization” and replace it with the following for each of these respective specific Priority Actions:

- Neah Bay Vessel of Opportunity Program - “Makah Tribe, WDOE, Industry, U.S. Coast Guard, and Navy”,
- Expansion of oil spill drills along the Strait and Coast - “Strait ERN, U.S. and Canadian Coast Guards, WDOE, Canadian Department of Fisheries and Oceans (DFO), and Transport Canada”, and
- Improved Trans-boundary coordination on oil spills - “Strait ERN, U.S. and Canadian Coast Guards, WDOE, DFO, Transport Canada, U.S. Congress, and U.S. State Department”.

Change Request: Remove the existing entry for the “Potential Funding Source(s)” and replace it with the following for all three of the specific Priority Actions: “WDOE and EPA Lead Organizations, U.S. Coast Guard, and Industry”.

Change Request: Remove the existing entry for the “Proposed Performance Measure” and replace it with the following for each of these respective specific Priority Actions:

- Neah Bay Vessel of Opportunity Program - “WDOE SB 1186 completed with Vessel of Opportunity Program”,
- Expansion of oil spill drills along the Strait and Coast - “Strait ERN participation in at least 2 drills”, and
- Improved Trans-boundary coordination on oil spills - “CANUSPAC exercise utilizing Vessel of Opportunity program and Neah Bay Tug complete”.

Pages 404 - 409 (Document pages 398 - 403)

Local Action Agenda Process; Key Threats / Pressures; Opportunities, Priorities, and Near Term Actions

Change Request: The following text was developed by the Strait ERN Oil Spill Task Force on behalf of the full Strait ERN to update the information associated with the Strait ERN Oil Spill Prevention, Preparedness, and Response, Packaged Local Near Term Action (C10.2 LNTA #1). This text either needs to be inserted as a standalone subsection within this profile for the Strait of Juan de Fuca or appropriately parsed and integrated into these pages. Note that some, but not all, of the text immediately below is already specifically noted in other Change Requests within this comment document. Please work with John Cambalik, the Strait ERN Coordinator, to assure that this text is correctly and substantively represented within this section of the Action Agenda.

Begin Change Request Text for document pages 398 - 403

Strait ERN Oil Spill Prevention, Preparedness, and Response, Packaged Local Near Term Action (C10.2 LNTA #1)

Local Action Agenda Process (Profile subsection)

The Strait Ecosystem Recovery Network (Strait ERN) is the Local Integrating Organization (LIO) for the Strait Action Area, and leads the prioritization and implementation of Action Agenda strategies in the Strait Action Area.

The Strait ERN undertook an extensive effort to complete a Strategic Plan and Work Plan to implement the Action Agenda within the Strait Action Area for the 2011-13 Biennium. The Strait ERN began by identifying and ranking the most immediate and significant "local threats" to the entire Strait of Juan de Fuca / North Olympic Peninsula ecosystem (i.e., Strait of Juan de Fuca Action Area geography). The ERN focused on those that may best benefit from the support and advocacy work of the collective membership of the Strait Ecosystem Recovery Network to accomplish actions at the local, state, tribal, and federal levels (see Key Threats/Pressures subsection below).

Once the threats were identified, the Strait ERN identified a list of 25 strategic priorities and then used the regional strategy prioritization methods from "open standards" as a guide to rank six of the 25 Strategic Priorities to be of the highest priority within the 2011-13 biennium for the Strait Action Area (see Priorities list below).

Key Threats/Pressures (Profile subsection)

The Strait ERN has identified 17 local threats to the health of the Strait of Juan de Fuca ecosystem. These threats are listed in rank order within the Strait ERN 2011-13 Biennial Work Plan as determined by the Strait ERN, including Oil and Hazardous Materials Spills - Large Scale and Marine Commercial Vessel Traffic Hazards.

Opportunities, Priorities and Near Term Actions (Profile subsection)

The Strait ERN identified 25 Strategic Priorities for the Strait Action Area. They ranked six of these as the highest priority for the 2011-13 biennium. Within these highest priorities, are the Local Near-Term Actions (LNTA) for the Strait Action Area, include (in rank order):

1. Elwha River Ecosystem Recovery,
2. Salmon Recovery Plans,
3. **Oil Spill Prevention, Preparedness, and Response,**
4. Shoreline Master Program Updates, Implementation, and Intergovernmental Coordination,

5. Stormwater Management Program Updates and Implementation, and
6. Instream Flow Rules

The over arching goal of the **Oil Spill Prevention, Preparedness, and Response** Strategic Priority is to – Implement and promote improvements in oil spill prevention, preparedness, and response programs, policies, or capabilities for the benefit of the Strait of Juan de Fuca and adjacent waters.

The “Strait ERN 2011-13 Biennial Work Plan, Appendix A2, Strait ERN Priority Actions” contains a comprehensive list of specific actions for all 25 Strategic Priorities identified by the Strait ERN. This list identifies possible lead government/agency/organizations as well as estimated funding needed for the 2011-13 biennium for each action. However it does not prioritize which specific actions should occur under each Strategic Priority. Those Strategic Priorities and associated specific actions are reviewed by the Strait ERN with each update of the Action Agenda.

For the purposes of this Action Agenda update, the Strait ERN would like to highlight actions under the top six Strategic Priorities. The Strait ERN considers the multiple actions under each priority to constitute a “packaged” Local Near-Term Action (Packaged LNTA). Effort is made to document what has been accomplished since the previous update as well as prioritization of the remaining specific actions within each Packaged LNTA. For more details on the specific actions, see Appendix 2 of the Strait ERN 2011-13 Biennial Work Plan. Please note that Appendix A2 does not prioritize between specific actions within a Strategic Priority.

Progress has been made in fulfilling several of the key goals initially identified for the Strait ERN Strategic Priority, **Oil Spill Prevention, Preparedness, and Response** (Strategic Priority ID#15) including most significantly the permanent stationing of the Neah Bay Response tug. In addition, the Strait ERN has gained a presence in several committees identified through the Makah Tribe’s appointment to the RRT/NWAC, Cross partnership oil spill workgroup (along with Clallam County Commissioner Doherty) as well as the oil spill advisory group established by Ecology to oversee the rulemaking required by SB 1186.

This representation also furthers the previously identified goals of establishing a liaison role for the Strait ERN during a spill for the Makah, being on the RRT, are notified if an incident command is being stood up in the region and has been trained to serve in the Command. As part of this training, the Makah have participated in CANUSPAC exercises along the Strait and Coast and was instrumental in calling for the update of the oil spill capability across the boarder in the US Coast Guard Reauthorization.

While this furthered the call for improved trans-boundary coordination on oil spills in the original priorities, this item, which specifically calls for tribal participation, remains a priority for this biennium as we expect this update to occur during this time.

There are ongoing needs to assure that GRPs are updated and ground-truthed. This is best accomplished through a rigorous drill program that also furthers the goals of improving the incorporation of vessels of opportunity and volunteers as called for in SB 1186. It is hoped that the existing GRPs are being incorporated into the updates of the Shoreline Master Plans underway, and visa versa, but will also need ongoing review.

Other ongoing needs include continued funding for HAZWOPER, Incident Command System, and Oiled Wildlife classes for volunteers from across the Strait Action Area, historically sponsored by the Clallam Marine Resources Committee (MRC), in cooperation with the Jefferson MRC. Continued support for the publicly funded oil spill response equipment caches that are strategically located throughout the Strait Action Area, and funding for routine training in the use of that equipment is also needed.

This leaves the three highest priority specific actions for this Biennium's Strait ERN Oil Spill Preparedness, Prevention, and Response, Packaged Local Near Term Action (C10.2 LNTA #1) to be:

- **Neah Bay Vessel of Opportunity Program** (Strait ERN Work Plan ID#15c) – The Makah fishing fleet is located in the strategic Port of Neah Bay at the junction between the Strait of Juan de Fuca and the outer Coast. The Port is defined as a spill response “staging area” in the State’s oil spill Contingency Plan. The resident fleet, along with government and industry spill response assets and the emergency rescue tug, make this port an ideal location for developing of a vessel of opportunity program, a critical enhancement to the region’s response capacity. The value of supporting a vessel of opportunity program with Neah Bay assets is recognized within the Governor’s letter of April 20, 2011 letter to Ecology’s Director, Ted Sturdevant. We support establishment of a Vessel of Opportunity program (VOO) in Neah Bay as part of SB 1186, as well as additional VOO programs along the Strait of Juan de Fuca (i.e., Port of Port Angeles and Port Townsend). Establishment of a Neah Bay VOO also furthers implementation of the U.S. Coast Guard Reauthorization Act of 2010 calling for a Neah Bay Pilot Project. This is particularly important over the next biennium for the U.S. Coast Guard will be moving the High Volume Port Line from Port Angeles to Cape Flattery in July 2012 thereby requiring more response capability in the western strait and outer coast region.

- **Expansion of oil spill drills along the Strait and Coast** (Strait ERN Work Plan ID#15g) – The Strait of Juan de Fuca is the busiest commercial maritime waterway in Washington State for it receives traffic bound to and from the third largest port-complex in the US as well as Canada’s largest port. The rapid growth of tar sand oil being exported from the port of Vancouver has significantly increased the risk of a large spill in the region. These unconventional oils will require unique response techniques to be developed. In addition, a proposed coal terminal near Bellingham will also significantly increase traffic of ships twice the size of tankers allowed to ply these waters.

Therefore it is critical that worst-case oil spill exercises, including equipment deployment, be conducted regularly in this region. The combined spill response assets housed in Neah Bay and Port Angeles afford substantial opportunities to drill. In addition, consider coordinating efforts with the Northwest Maritime Center (Port Townsend, WA) to host and expand drills and table-top exercises along the Strait of Juan de Fuca, outer Coast, and Puget Sound waterways utilizing their Pilothouse/Oil Spill Training Center currently under construction. Drills and exercises should incorporate vessels of opportunity, publicly funded response equipment caches, and maritime industry participants as well. All of these assets are owned by various different organizations, that if drilled together, would afford opportunities to improve efficiencies through coordination.

- **Improved Trans-boundary coordination on oil spills** (Strait ERN Work Plan ID#15b) – Over half of the Strait of Juan de Fuca is bordered by Canada. Therefore, it is critical that we continue to exercise our combined spill response capacity in this region. We support enhancement of the US and Canadian Coast Guards annual joint spill response exercises, known as CANUSPAC, on both sides of the border with additional equipment and personnel. These exercises primarily involve drilling the procedures necessary to bring a limited amount of response assets across the border. In addition, the U.S. Coast Guard Reauthorization Act called for our two countries to reevaluate the comparability of spill response, tug escort, and rescue towing assets on either side of the border as called for in the Combined Vessel Traffic Service Treaty. It is expected that this effort will commence this biennium. The BC/Pacific States Oil Spill Task Force has already documented the disparity of spill response capacity across the border. The completion of this review can serve to significantly improve our region’s combined capabilities. Additionally, the current estimates of Canadian vessel traffic projections need to be incorporated into updates of vessel traffic risk assessments.

C10.2 LNTA #1 Lead Organizations, Potential Funding sources and Performance Measures Table

Packaged C10.2 LNTA 1 (and Strait ERN Work Plan ID#)	Lead Organization	Potential Funding	Performance Measure
Oil Spill Preparedness, Prevention, and Response (ID#15)	Strait ERN Oil Spill Task Force member organizations	Ecology and EPA Lead Organizations, Coast Guard/ Industry	Progress on below items in addition to those described above
Neah Bay Vessel of Opportunity Program (ID#15c)	Makah, Ecology, Industry, Coast Guard, Navy		Ecology SB1186 rule completed with VOO
Oil Spill Drills in Strait of Juan de Fuca (ID#15g)	Strait ERN, Coast Guard, Ecology, DFO, Transport Canada		Strait ERN participation in at least 2 drills
Trans-boundary Spill Capacity (ID#15b)	Strait ERN, Coast Guard, Ecology, DFO, Transport Canada, Congress, State Department		CANUSPAC exercise utilizing VOO and Neah Bay tug complete

End Change Request Text for document pages 398 - 403

Page 409 (Document page 403)

This comment addresses an important item that is absent from this Strait of Juan de Fuca Profile. It might be best to insert this absent information as a separate table to immediately follow the “Packaged” Priority NTA Table within the text.

Change Request: It's unclear why the table of "other ecosystem pressures" that are important to the Strait ERN and Action Area, originally submitted within the Strait ERN LIO Template in September 2011 (i.e., Table 2 on pages 7-9), were not included within this Profile. Information from that Table 2 should be included within this Profile. When including this information, the “other ecosystem pressures” need to be represented alphabetically, as was originally submitted within Table 2 of the Strait ERN LIO Template.

Link to Recovery Targets (introductory paragraph)

Suggestion: Typographical error - Include mention of floodplains within this sentence to be consistent with the content in the Pressure Reduction Target table, namely: ...Soundwide pressure reduction targets (land development, wastewater, shoreline alteration, stormwater, and floodplains).

Page 416 (Document page 410)

Local Implementation Structure - 1st paragraph

Suggestion: This first sentence should read "Starting in 2009,..." as the Strait ERN started identifying and refining strategies and actions at their first official quarterly meeting in September of that year.

Page 417 (Document page 411)

References and Additional Resources

Suggestion: The webpage link to the Strait Ecosystem Recovery Network 2011-13 Biennial Work Plan is not operational within this document and needs to be fixed.

Appendices

Appendix D: NTA Table

Page 491 (Document page 485)

A5.3 LNTA 2 Salmon Recovery Lead Entities

Suggestion: It would be informative to somehow cross reference the two floodplain restoration projects listed under A6.1 LNTA 2, namely the NOPLÉ Dungeness River Floodplain Restoration, Phase II and the Elwha Engineered Log Jams, to strategy A5.3 within this table.

Page 492 (Document page 486)

A6.1 LNTA 1 Elwha River Ecosystem Recovery

Change Request: These three specific Priority Actions are already prioritized in the order shown, hence should be noted as such using numeric bullets (*i.e.*, 1, 2, and 3), not simple bullets, within this LNTA.

Change Request: List the "Elwha Fish Committee partners and others" as the Owners/Secondary Owners of this LNTA.

Change Request: Change the text for this Performance Measure to read the following: "Continuous weir operation (Priority Action #1) and monitoring of salmonids for adults, juveniles, and smolts (Priority Action #2) on the Elwha River". Including the Priority Action #s here serves as a cross-reference to the full list of three Priority Actions that are a part of this LNTA.

A6.1 LNTA 2 Salmon Recovery Plans

Suggestion: Within the two 3-Year Work Plans from the two Lead Entities (*i.e.*, NOPL and HCCC) operating within the Strait are many important marine and nearshore and pollutant reduction actions. For this reason, it may be more appropriate to move this LNTA#2 somewhere under strategy A9, the Action Agenda's Salmon Recovery Strategy. Alternatively, if this LNTA#2 remains under A6.1, it should be, at a minimum, specifically cross referenced somewhere under A9.

Change Request: List the "North Olympic Peninsula Lead Entity, Hood Canal Lead Entity, and their respective member organizations" as the Owners/Secondary Owners of this LNTA.

Change Request - List the four specific Priority Actions as indented sub-bullets under the respective NOPL and HCCC 3-year work plans in order to show the 3-year work plan origin.

Page 493 (Document page 487)

A8.1 NTA 1 Instream Flow Rules (Soundwide - Ecology)

Change Request: Include a separate LNTA table entry here (and on document page 86) under A8.1 to fully represent the Strait Instream Flow packaged LNTA (and associated Priority Actions) to adopt and/or implement Instream Flow rules for WRIA 17, 18 (East and West) and 19. As written, this NTA from Ecology does not fully encompass all of the 5 Priority Actions originally submitted by the Strait ERN to the Partnership in September 2011 as part of the Strait ERN LIO Templates. Including a separate LNTA from the Strait ERN within this table would

comprehensively represent and emphasize the priority actions that are currently either missing or underrepresented, namely the WRIA 18 East (DRMT) Stream Flow Improvements, WRIA 17 Sequim Bay (via DRMT), WRIA 18 WEST (EMMT), and WRIA 19. Regarding WRIA 19, include mention within the description of this action of the need to compile empirical data on exempt wells, similar to what WRIA 17 had accomplished.

Change Request: Once this separate LNTA is added to this table, list the “Washington Department of Ecology and local watershed management organizations (i.e ., WRIAs 19, Elwha Morse Management Team, Dungeness River Management Team, and East Jefferson Watershed Council) and their respective member organizations” as the Owners/ Secondary Owners of this LNTA. This information was also submitted to the Partnership in September 2011 as part of the Strait ERN LIO Templates.

Change Request: Once this separate LNTA is added to this table, include the following Performance Measure: “Initiate or complete 66% of the Priority Actions identified by the Strait ERN for the Strait Action Area.” This information was also submitted to the Partnership in September 2011 as part of the Strait ERN LIO Templates.

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B2.1, LNTA 3 Shoreline Master Program Updates

Suggestion: Correct the typographical error for "SMP", not "SPM".

Change Request: List " Clallam and Jefferson counties and Cities of Port Angeles, Sequim, and Port Townsend, and others" as the Owners of this packaged LNTA.

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C2.2 LNTA 6 Stormwater Management Program Updates and Implementation

Change Request: List "Clallam and Jefferson counties and Cities of Port Angeles, Sequim, and Port Townsend, and others" as Owners of this LNTA.

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C10.2 LNTA 1 Oil Spill Prevention, Preparedness, and Response

Change Request: Remove all of the existing specific Priority Actions listed as bullets under this “packaged” LNTA and replace them with the following:

- Neah Bay Vessel of Opportunity Program,
- Expansion of oil spill drills along the Strait and Coast, and
- Improved Trans-boundary coordination on oil spills.

All of the other Priority Actions previously submitted by the Strait ERN within the Strait ERN LIO Template back in September 2011 for this “packaged” LNTA are now considered by the Strait ERN to be either essentially completed or “ongoing” actions in need of continued support.

Change Request: Remove the existing entry for the “Owners” and replace it with the following for each of these respective specific Priority Actions:

- Neah Bay Vessel of Opportunity Program - “Makah Tribe, WDOE, Industry, U.S. Coast Guard, and Navy”,
- Expansion of oil spill drills along the Strait and Coast - “Strait ERN, U.S. and Canadian Coast Guards, WDOE, Canadian Department of Fisheries and Oceans (DFO), and Transport Canada”, and
- Improved Trans-boundary coordination on oil spills - “Strait ERN, U.S. and Canadian Coast Guards, WDOE, DFO, Transport Canada, U.S. Congress, and U.S. State Department”.

Change Request: Remove the existing entry for the “Performance Measures” and replace it with the following for each of these respective specific Priority Actions:

- Neah Bay Vessel of Opportunity Program - “WDOE SB 1186 completed with Vessel of Opportunity Program”,
- Expansion of oil spill drills along the Strait and Coast - “Strait ERN participation in at least 2 drills”, and
- Improved Trans-boundary coordination on oil spills - “CANUSPAC exercise utilizing Vessel of Opportunity program and Neah Bay Tug complete”.

End Strait ERN Comments