



LUMMI INDIAN BUSINESS COUNCIL

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DEPARTMENT _____ DIRECT NO. _____

February 3, 2012

Mr. Gerry O'Keefe, Director
Puget Sound Partnership
PO Box 40900
Olympia, WA 98504

Re: Comments and Concerns on the Draft Action Agenda

Dear Gerry:

We appreciate the opportunity to comment on the draft Puget Sound Action Agenda update. It is a very long and complicated document. We will limit our comments and concerns to the document and process as a whole rather than specifics on each strategy or action. We have participated in many of the groups working to ensure that the Action Agenda update identified cost-effective, transparent, and accountable actions that will reverse the degradation of the Puget Sound ecosystem from the white-tops of the mountains to the white-caps of the open ocean. The oral tradition and history of the Lummi community and their Schelangen knows that all actions are interconnected and that human activities must be conducted with the understanding that consequences might lead to the destruction of ecosystem goods and services that sustain our Schelangen. The Lummi Schelangen depends on a healthy Puget Sound ecosystem. We need look no further than the increase in the population in the Puget Sound region and the decline of salmon runs.

Although legislative changes are not incorporated in the Action Agenda, there is a potential for confusion between references to the Puget Sound Partnership as a state agency responsible to the governor, and as a Partnership of local governments, state agencies, federal agencies, tribal governments, economic interests, and environmental interests seeking to transparently identify and implemented actions required to restore and protect a healthy Puget Sound ecosystem. The process in developing the Action Agenda update was vastly improved over the process that generated the original Action Agenda. The involvement of a large cross-section of regional expertise and interests identified actions, but did not have the opportunity to evaluate action's effectiveness in protecting or restoring priority ecosystem goods and services, distinguish between existing and required funding, identify accountable parties and prioritize implementation in a time of declining financial resources.

Lummi along with other tribal governments, are concerned that many of the proposed actions add process (*convene, study, develop, identify, assemble data, explore options*), rather than directly reduce pressures on priority objectives (*reduce, improve, restore, control, enforce,*

implement, ensure, manage, prevent, increase, protect, enhance, strengthen), identify measurable outcomes and charge responsible parties. It seems that there was too much emphasis on supporting existing state agency programs and initiatives and similar pet projects rather than a zero based budget approach to effectiveness in meeting Puget Sound protection and restoration objectives.

Along with other tribes, we do not feel that the Action Agenda adequately identifies the measures required to protect our Schelangen or way of life. There should be more emphasis on habitat protections required for salmon recovery as salmon are an essential part of our Schelangen. The Action Agenda should align state and federal programs to be consistent with the protection of treaty reserved rights, salmon recovery and the required water quality and quantity. Lummi would rank all actions on how soon and how much they would provide the ecosystem goods and services to support the habitat required to produce harvestable salmon populations. History has demonstrated that loss of forest cover, channel simplification, flood plain development, disruption of the natural flow of water, estuary simplification, and change in water quality as the result of human activities are all associated with the decline of salmon stocks which depend on these services and a healthy and productive food chain to survive.

We hope that this comment will assist in developing an Action Agenda of prioritized actions focused on the recovery of salmon. Should you need further clarification or comment, please feel free to contact me at (360) 384-2223 or randyk@Lummi-nsn.gov or Alan Chapman at (360) 384-2202 or alanc@lummi-nsn.gov.

Sincerely yours,

Randy Kinley
ESA Coordinator
Lummi Natural Resources

CC: NWIFC, Puget Sound Tribes