



February 3, 2012

Mr. Gerry O'Keefe, Director  
Puget Sound Partnership  
326 E D Street  
Tacoma, WA 98421

Re: Comments and recommendations regarding the update of the Puget Sound Action Agenda.

Dear Director O'Keefe,

Thank you for the incredible effort to developing a scientifically credible and stakeholder-driven plan to recover Puget Sound. We appreciate the opportunity to comment on the draft Action Agenda and submit the following on behalf of The Nature Conservancy.

The draft Action Agenda includes many solid targets, strategies and actions. It clearly represents an advance from the first and includes many important actions. It should establish a foundation for future updates. As in the past, our challenge has been to best comprehensively the breadth of what's needed to recover the Sound, while ensuring that stakeholders, partners and the public can clearly see the highest, most critical priority actions. We recognize the Partnership continues to work on a high level synthesis that should provide this distillation, but nonetheless focus our comments on the need to better synthesize, integrate and communicate the most strategic, cross-cutting actions that will break from the status quo and put Puget Sound on a trajectory to recovery. We offer the following comments and suggestions in an effort to help the Partnership create an Action Agenda that is easier to manage and track, more broadly readable, and more clear about what must change from our current path.

Our concerns with the draft are:

1. The document is too long. While full of tremendous information and ideas, we are disinclined to believe that many – even those entrenched in resource issues in Puget Sound – will read and absorb the entire change agenda. Unless the document is reduced to a manageable size, we fear its power will be lost before implementation even begins.
2. The different strategy sections appear cobbled together rather than an integrated suite of strategic actions. This “siloes” nature is a result of an understandably siloes process that led to the development of the Update. We fully understand the pragmatic need to separate the working groups that developed the strategies. As you move to a final draft however, the focus now should be on drawing the connections between the sections, making sure that each strategy is advancing

multiple targets (and not undermining any), and prioritizing those that advance multiple targets (by recovering the core ecological processes the Ecosystem depends on). To move beyond the status quo and accelerate recovery we need to find efficiencies between the many aspects of recovery.

3. It appears to be all-inclusive – as if the effort was to collect every possible strategy and action rather than to try to identify the most critical elements of recovery. Before we even get to prioritization we believe some strategic choices about what is most important need to be made. We need to move beyond the status quo. To create the change that is needed, we need to make sure there is an awareness of those things that are most important and ensure agency resources and efforts are channeled in that direction. The AA should serve as the starting place for that change.
4. Salmon recovery actions appear to be less central to our priorities than they should be. Salmon are critical culturally, legally and ecologically. They are both a keystone and indicator species within both the freshwater and marine realm of Puget Sound. If we do what is needed to recover salmon, we will be most of the way to Puget Sound ecosystem recovery. Further, much of the existing attention, funding and effort of partners and stakeholders is focused on salmon recovery in Puget Sound. The structure and content of salmon recovery actions in the Update leaves the impression that it is separate from the larger cause of salmon recovery. This undermines the efforts to integrate the multiple aspects of recovery and achieve the efficiencies and impact needed to attain recovery.
5. As noted in the draft document, climate change risks and challenges must be better addressed. Climate change is one of the biggest threats to the long term health of people and nature in Puget Sound. It affects every ecosystem recovery target in real and significant ways. Addressing this overarching issue substantively in the AA will help ensure the document stands up to scrutiny and becomes the credible recovery agenda we all hope it will become.
6. The Agenda seems to downplay the role of estuary restoration (particularly dike removal) in Puget Sound recovery. There are no strategies directly related to estuaries, in contrast to other system components like floodplains, beaches and bluffs. Though the topic of armoring could conceivably include dikes, the strategy description is clearly targeted at bluffs and beaches, and there are no estuary-related NTAs. Few, if any, NTA's clearly target estuaries and the draft AA appears to place all estuary restoration hopes and responsibilities on the Chinook recovery efforts. As estuaries are at once the most productive and most degraded habitat type in Puget Sound, this would seem to be shortsighted.

In lights of these concerns, we offer the following recommendations:

1. Create a short, polished final draft. Pull out the suite of those strategies deemed most important through the integration and culling process described below and the planned prioritization process. Move the existing strategy sections to an appendix and eliminate the local scale actions that are included inconsistently and appear out of place in the regional strategy sections. Utilize a professional editor to develop a short Action Agenda (25-50 pp.) that speaks to the strategies and

actions as a compelling suite of integrated actions that, together, lead to the recovery of the suite of targets. We recognize the statute requires a comprehensive plan. We think this organizational approach, that could use addenda to catalog additional actions underway through locals, state and feds would satisfy the requirements.

2. Create more focus on integrated, multiple objective strategies and Near Term Actions. We believe three things could be done to achieve this:
  - a. First, strengthen the existing content by finding and highlighting the connections between the different strategies and NTA's. Ensure that the NTA's are written in ways that identify and draw on the connections to and relevance of multiple targets. For example, actions in the land development section that speak to ecologically important or sensitive areas should be focused specifically on those important areas associated with advancing other recovery targets (e.g. salmon, floodplains, wetlands that help with water quality).
  - b. Second, identify and prioritize those actions that advance multiple targets. We simply do not have the financial or political luxury of executing every activity associated with every element of the Puget Sound ecosystem. Hard choices must be made. But in light of limited resources it makes sense to focus on those efforts from which we get the biggest bang for the greatest number of targets.
  - c. Third, identify and develop a suite of high level, cross-cutting strategies. Much of the strategy development work was done through narrow teams focused on one or two pressures or targets. (The floodplains team—which made an explicit effort to incorporate floodplain function, salmon, water quality, resource lands and human well-being—are a notable exception to this.) Very good work was done by these teams, but we believe efficiencies could be made by identifying strategies or NTA's that cut across a greater body of targets. We suggest convening a targeted group of regional recovery leaders (e.g. agency heads, regional experts) to identify a small suite of cross-cutting strategies or initiatives that can advance multiple targets at once. We simply need to move beyond narrowly defined programs, projects and resource allocation decisions in order to increase efficiencies and ensure we're focused on the core processes that sustain all of Puget Sound.
3. Strategically develop buy-in and support for a coordinated approach to investing in fewer strategies/initiatives to ensure we're having a greater impact. Using the strategic priorities framework, coordinate state and federal program attention around a few singular geographies or recovery projects that advance multiple targets by more coordinated expenditure of limited public money and by stronger cooperation among state and federal programs whose outcomes could be complementary if they were better integrated. Currently the public is challenged to see the impacts of the considerable expenditure of resources aimed at improving the environmental health and the quality of life we derive from living in Puget Sound. A more coordinated investment of even some of these resources is necessary to achieve the large scale impacts we need to reverse the trends of

decline, make recovery more tangible and visible to the public and engender the broad-based political support necessary to sustain future public support of recovery actions.

4. Make the centrality of salmon recovery efforts clear. First, the salmon strategies section should be at least as robust as the other strategy sections – even if these individual chapters are moved to the appendix as suggested above. Second, clarify that land protection, floodplain and estuary restoration, water quality and other such strategies should be geared, in part, to protecting and restoring the habitat that salmon depend on. Third, consider making salmon recovery the first strategy as opposed to being buried deep in the document. Fourth, and perhaps more importantly, make the changes necessary to be sure the suite of activities proposed by the AA are consistent with the salmon recovery plans and highlight the manner in which the AA is going to help state and federal agencies respond to the Treaty Rights at Risk paper.
5. Incorporate climate change as one of the priority cross-cutting strategies (see 2c above). Because the health of both people and nature are vulnerable to climate change, it may be a great catalyst for affecting the level of change in governance, society and action that will be required to recover Puget Sound. Whether this involves flood districts or utilities joining floodplain restoration efforts in order to reduce the impact of increased flooding or sedimentation in rivers, or communities strategically restoring tidal marshes to increase storm protection services provided, climate change adaptation can be a catalyst to create the non-traditional partnerships and multiple-benefit projects that are needed to recover Puget Sound. Climate change is one of the biggest threats to the PS ecosystem. But it provides an opportunity for critical legislative changes and for engendering new partnerships and new approaches accelerating progress on Puget Sound recovery.
6. Strengthen the treatment of estuary restoration by: Making it clear that the definition of “floodplains” extends to estuaries so includes much of the estuarine environment. Strengthening the salmon section given the clear prominence of estuary habitat as a major limiting factor. Revising or adding to the nearshore/marine strategies and NTA’s to better advance this critical part of the system.

We greatly appreciate the effort made by PSP to develop a stronger, more credible Action Agenda. We would be happy to discuss our recommendation for helping with this important goal.

Sincerely,



Chris Davis  
Director, Conservation  
The Nature Conservancy of Washington