# Shared Strategy for Puget Sound Comments on April 2006 Three Year Work Plan

# Lake Washington/Cedar/Sammamish Watershed (WRIA 8)

#### Introduction

In April, 2006, watersheds submitted three-year work programs that would enable them to get on a recovery trajectory in the first three years of implementation. The work plans were reviewed by the Puget Sound Technical Recovery Team (TRT) and the Shared Strategy Interdisciplinary Policy Team. Technical and policy feedback on your three-year work program is provided below.

The feedback is intended to assist the Lake Washington/Cedar/Sammamish planning team as you refine your three-year work programs and continue with implementation of your Chinook Salmon Conservation Plan. The feedback will also be used by the TRT and Shared Strategy Work Group to inform the development of the regional work plan. A summary of the work program was developed by Shared Strategy staff to stimulate discussion on recovery objectives to determine what the best investments are for salmon recovery over the next three years.

### Objectives provided as guidance for the development of work programs

The following objectives were provided as guidance to watersheds in the development of the work plan. The Shared Strategy Work Group and TRT developed the objectives pursuant to consultation with watershed implementation leads and the Recovery Council.

- Improve the level and certainty of protection for habitat
- Protect the twenty two existing Chinook populations by beginning to address the most immediate and potentially greatest threats that could cause populations to decline in this timeframe
- Preserve options for increasing ESU diversity
- Restore ecosystem processes for Chinook and other species by preserving options for habitat restoration, and by addressing the most immediate and potentially greatest threats in

estuaries mainstem upper watershed freshwater tributaries and nearshore water quality and quantity

- Advance the integrated management of harvest, hatchery and habitat to address the most immediate and potentially greatest threats
- Continue to expand and deepen individual and community support for key priorities
- Develop and implement adaptive management and monitoring program monitoring

accountability system for evaluation and decision making

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- Build capacity in each watershed to implement the full breadth of prioritized programs and projects needed to get on a recovery trajectory in the first there years
- Support multi-species

### I. Puget Sound Technical Recovery Team Review

The TRT reviewed fourteen individual watershed salmon recovery three-year work programs in May 2006. Three questions were addressed. The questions and review comments are below.

1. Is the work program consistent with the hypotheses and strategy for their watershed? (The work program includes hypotheses and strategies in the larger plan, including watershed plan, TRT review comments and NOAA Supplement comments).

The work program is generally consistent with the 10-year plan priorities and revisions to those priorities based on the TRT reviews. The priority areas remain (1) Cedar River, (2) North lake Washington Tributaries, and (3), Sammamish/Issaquah. The distribution of funding requests in these areas reflects their priority order, but also addresses the TRT concern that little or no effort was directed toward non-hatchery fish in Issaquah Creek (the plan now includes habitat restoration in that stream).

The hypotheses are most well-developed for the Cedar where the loss of a river-rearing life history trajectory is the result of channel degradation – especially loss of large, deep pools and the lack of floodplain connectivity. The reasons for the low abundance and productivity of the Sammamish population are not as clearly specified as for the Cedar population.

The work program targets both acquisition of remaining critical habitats and restoration of in-channel and off-channel habitats in the prioritized reaches. The project types are consistent with hypothesized effects on salmon survival, focusing mainly on rearing habitats in river/floodplains and lake Washington itself.

The plan recognizes the influence of land development on these habitat conditions and employs a number of programmatic actions to address them.

Significant efforts are focused on programmatic actions which are considered necessary to achieve long-term restoration goals. While it is difficult to be certain that the proposed actions are sufficient to slow or stop the loss of habitat, it seems relatively certain that omitting these efforts will allow significant future habitat degradation.

2. Is the sequencing and timing of the work program appropriate for the first 3 years of implementation?

Taken as the first step in a ten-year and longer plan, the group of actions that comprise the three-year plan are well-timed and generally the first actions that are deemed

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necessary to begin recovery. Within the three-year plan itself, there is little discussion of the appropriate sequence and timing of actions: should programmatic and incentive actions to control land use effects precede restoration actions? Should actions in the Cedar preceded actions in the Sammamish? Given the status of the Cedar population, when should restoration actions take place to minimize the risk to the current population? As it now reads, all actions and activities seem to be proceeding virtually at once. This may suggest a de facto sequence given the lag in restoration actions due to design and permitting issues.

Most large actions are focused on floodplain and shoreline restoration. This appears appropriate given their importance to these populations. The success of such actions is likely to be high despite some modification of flow and sediment regimes.

3. Are there significant components missing from the work program? If so, what are these and what can be done about them in the 3-year work program or at a regional scale?

Yes. Hatchery and harvest actions are missing from the plan. This is especially critical for the Cedar population, already suffering from low abundance and which is experiencing a continued downward trend in productivity. One of the hypotheses from the plan suggests that hatchery strays are a significant problem for this population and could lead to introgression and loss of genetic integrity. Yet, there are no recommendations for modifying hatchery practices to reduce straying, or for separating hatchery strays from native Chinook prior to reaching the spawning ground. In addition, there is no recommendation that considers how to sustain the Cedar population if the downward trend in productivity continues.

Among the prior TRT comments was a specific recommendation that H-Integration be a high priority. While there is a line item for H-Integration (\$300,000) and a mention that WRIA 8 is working with WDFW to assure that all of the H management strategies are compatible, there is no clear description of how this is to be accomplished. A more thorough description of what this integration project entails would increase confidence that it will accomplish the purpose of understanding whether hatchery and harvest actions will limit recovery despite habitat restoration efforts.

### Comments on how well the plan addresses objectives

- 1. Improve the level and certainty of protection for habitat and the 22 existing Chinook populations.
- 2. Preserve options for achieving the future role of this population in the ESU
- 3. Ensure protection and restoration preserves and restores ecosystem processes for Chinook
- 4. Advance the integrated management of harvest, hatchery and habitat

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The work program targets both the Cedar and the Lake Sammamish populations for protection and restoration actions, although most activities are directed at the Cedar population, which is consistent with the hypotheses and priorities.

The work program is most successful at working toward objectives 1 through 3 by focusing a substantial amount of action efforts on protecting existing habitat, high value floodplain and inchannel protection and restoration, and shoreline rearing habitats. It also addresses a main concern of the TRT, which was that its original plan did not appear to preserve options for a future role for the Sammamish population in the ESU. WRIA 8 revised their management strategy to address this population separately from the Cedar population, and to begin restoring habitats for naturally spawning Chinook in Issaquah Creek. The issues of an adequate flow regime are not addressed except through future analyses and negotiations.

There is less certainty concerning objective 2, given the absence of harvest and hatchery components in the work plan aimed at reducing the hypothesized effects of strays on the Cedar population and the lack of any program for immediately stabilizing the productivity of the same population. Establishment and implementation of an adaptive management plan is contemplated and called out as the over-arcing principle.

The work program remains vague in addressing objective 4. The work plan does not contemplate the integration of the Hs at this time. Instead, it relies on the regional adaptive management processes to address the issues. While H-Integration has been initiated by WDFW and substantial funding requested, there is no description of what methods or tools the workgroup proposes to use in addressing this issue.

It is important that the watershed recovery team continue to refer to the May 2005 Technical Gap Analysis to ensure that uncertainties are addressed in the adaptive management plan and work program refinements.

#### **II.** Policy Review Comments

Shared Strategy Interdisciplinary Policy Team Review

The policy evaluated each of the fourteen watershed work plans. The following questions guided the evaluation of the work plans.

- 1. Is the work program consistent with the policy feedback and recommendations from the 2004 documents ("Watershed Policy Feedback Summaries", Recovery Plan December 2005, Volume I, Watershed Profiles results sections, and NOAA's federal supplement published in the Federal Register on Dec. 16, 2005)?
- 2. Is the work program tied to the objectives identified at a pace sufficient to achieve the watershed's ten –year goals?
- 3. Are there significant elements missing and how might these be addressed?

The interdisciplinary policy review team noted strengths of the Lake Washington/Cedar/Sammamish three-year work program as well as gaps and special issues

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warranting attention. Specific comments are provided below, followed by a short discussion of elements common to all watersheds.

## Comments and special issues

The work program refers to "integration of regulatory flexibility to benefit salmon". It would be helpful for reviewers to know what is meant by this and what activities are entailed.

The planning team is encouraged to review policy and technical feedback provided in 2004 and 2005 as it develops its adaptive management plan and pursues H-Integration activities.

Plan refinement and implementation will be benefited by an assessment of protection needed on the Cedar mainstem and analysis of impacts of population growth through "built-out" scenarios.

The work program does not reflect activities that reflect linkage between the work program and the Cedar River HCP.

### Elements in common with other watershed work programs

All Puget Sound watersheds' work program refinements and recovery plan implementation activities will benefit from additional efforts to achieve H-Integration and the development of an adaptive management plan. Protecting and restoring ecosystem processes for Chinook and other species by preserving options and addressing threats remains a critical component of recovery planning both at the local and regional scale. It is important to ensure that all Puget Sound watersheds strengthen their capacity to implement needed actions and to expand and deepen support for recovery program objectives. Recommendations to stimulate discussions on how to achieve these objectives are contained in a Shared Strategy document entitled "Watershed Work Plans related to Key Puget Sound Recovery Objectives", available on the Shared Strategy web site.

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