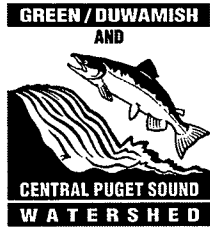


WATER RESOURCE INVENTORY AREA 9 (WRIA 9) WATERSHED ECOSYSTEM FORUM



July 23, 2009

Rebecca Hoff
NOAA Office of Response and Restoration
7600 Sand Point Way N.E.
Seattle, WA 98115

Re: Comments on Draft Lower Duwamish River Restoration Plan & Programmatic Environmental Impact Statement (RP/PEIS)

Dear Ms. Hoff:

Thank you for the opportunity to submit comments on the Draft Lower Duwamish River NRDA Programmatic Restoration Plan & Programmatic Environmental Impact Statement (RP/PEIS) for the Lower Duwamish River.

The following comments are offered on behalf of the WRIA 9 Watershed Ecosystem Forum, a broad-based partnership of governments, businesses, and non-profit groups working on watershed health and salmon habitat recovery in the Green/Duwamish and Central Puget Sound Watershed. These comments are intended to complement the comments that may be provided by WRIA 9 partner jurisdictions such as Seattle, Tukwila, and King County.

- 1) Thank you for your responsiveness to comments provided during the scoping process in the July 31, 2007 letter from WRIA 9 Watershed Coordinator Doug Osterman. Most of the comments in that letter were acted on in the draft RP/PEIS. As a corollary, we appreciate the use in the RP/PEIS of recommendations from the 2005 WRIA 9 Salmon Habitat Plan: Making Our Watershed Fit for a King.
- 2) We concur with the policy of integrating restoration with the sediment cleanup effort under the Lower Duwamish Superfund process. The WRIA 9 Salmon Habitat Plan includes a policy (DU2 on page 7-78) supporting concurrent cleanup and restoration. We ask the Trustees to be more specific about when and how they expect to coordinate decisions about integrated cleanup/restoration with the Environmental Protection Agency, Department of Ecology, and potentially responsible parties. Greater clarity on this matter will increase the likelihood that restoration occurs sooner rather than later, which in turn will generate greater ecological value.

Algona
Auburn
Black Diamond
Burien
Covington
Des Moines
Enumclaw
Federal Way
Kent
King County
Maple Valley
Normandy Park
Renton
SeaTac
Seattle
Tukwila

King Conservation District
Vashon/Maury Island
Community Council
Covington Water District
Port of Seattle
Tacoma Public Utilities
Washington Department
of Ecology
Washington Department
of Fish and Wildlife
Washington Department
of Natural Resources
U.S. Army Corps of Engineers

Washington
Environmental Council
Green/Duwamish
Watershed Alliance
Trout Unlimited/Mid-Sound
Fisheries Enhancement Group
Save Habitat and Diversity of
Wetlands (SHADOW)

The Boeing Company
Master Builders Association
King County Agricultural
Commission

*Financial support provided by signers of Watershed Planning Interlocal Agreement for WRIA 9 including:
Algona, Auburn, Black Diamond, Burien, Covington, Des Moines, Enumclaw, Federal Way, Kent, King County, Maple Valley,
Normandy Park, Renton, SeaTac, Seattle, Tacoma, Tukwila*

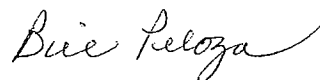
- 3) We concur with the primary focus on creation of mudflats, marshes, and riparian habitats. These are the habitat types most needed to restore/rehabilitate the estuarine ecology of the Duwamish and thus of greatest benefit in terms of salmonid habitat. We appreciate the recognition given to the importance of transition zone habitat to juvenile Chinook salmon.
- 4) We concur with the use of juvenile Chinook salmon as one of two fish species used to assess the value of restored/rehabilitated habitat to fish.
- 5) We concur with the Trustees' preferred restoration alternative: Alternative 3: Integrated Habitat Restoration. WRIA 9 partners are working to restore the ecological health of the Green/Duwamish and Central Puget Sound Watershed as a means toward recovering habitat used by Chinook and other salmonids. The proposed ecological approach, informed by the needs of juvenile Chinook as a surrogate species for other fish species, is consistent with our approach.
- 6) We concur with the approach of using Habitat Focus Areas to prioritize restoration/rehabilitation and support directing as much restoration/rehabilitation as possible into Habitat Focus Area 1, the Lower Duwamish. The WRIA 9 Salmon Habitat Plan, in fact, is counting on the success of the Restoration Program in the Lower Duwamish to complement habitat restoration work done upstream and in the marine nearshore. We encourage the Trustees to only modestly discount the value of any projects done in Habitat Focus Area 3 (the Duwamish from North Wind's Weir [RM 6.3] to Black River [RM 11]) as compared to projects done in HFA 1. While the Salmon Habitat Plan identifies the known transition zone as extending to RM 7.0, there is great ecological benefit from projects throughout the Upper Duwamish.
- 7) We strongly support the recommended use of a mechanism that funds and arranges for long-term stewardship of the restored/rehabilitated sites.

Thank you for the opportunity to comment. Please contact WRIA 9 staff Dennis Clark, 206-296-1909, dennis.clark@kingcounty.gov with any questions and regarding future comment opportunities.

Sincerely,



Dow Constantine, Co-Chair
Councilmember, King County



Bill Peloza, Co-Chair
Councilmember, City of Auburn

Cc: WEF Members