



Beaux Arts Village  
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 Kenmore  
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 Mill Creek  
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 Mukilteo  
 Newcastle  
 Redmond  
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 Sammamish  
 Seattle  
 Shoreline  
 Snohomish County  
 Woodinville  
 Yarrow Point

The Boeing Company  
 Cedar River Council  
 Greater Maple Valley Area Council  
 Greater Seattle Chamber of Commerce  
 Mid-Sound Fisheries Enhancement Group  
 Northwest Marine Trade Association  
 Save Lake Sammamish  
 Sustainable Fisheries Foundation  
 Trout Unlimited

US Army Corps of Engineers  
 Washington Departments:  
 Ecology  
 Fish and Wildlife  
 Natural Resources  
 Washington Association of Sewer and Water Districts  
 King Conservation District

Feb. 3, 2012

Gerry O'Keefe, Executive Director  
 Puget Sound Partnership  
 326 East D Street  
 Tacoma, WA 98421



RE: Comments on the draft Puget Sound Action Agenda Update

Dear Mr. O'Keefe,

Thank you for the opportunity to comment on the draft update to the Action Agenda. I am writing you in my capacity as Chair of the Lake Washington/Cedar/Sammamish Watershed (WRIA 8) Salmon Recovery Council which is comprised of 27 local governments, businesses, community groups, concerned citizens and state and federal agencies who have been working together since 2000 to recover Chinook salmon in our watershed. Our effort is part of the overall regional effort to recover listed Puget Sound Chinook salmon.

Recovering salmon populations is critical to restoring the health of Puget Sound. We believe an important goal for updating the Action Agenda is to better integrate salmon recovery priorities from the Puget Sound Salmon Recovery Plan into the Action Agenda strategies. We are encouraged that the draft Action Agenda update reflects this integration much more clearly than the original Action Agenda. We also appreciate that the funding strategy includes development of a legislative strategy to adopt a local funding mechanism and acknowledges the collaborative work of the South Central Puget Sound salmon recovery watersheds on assessing watershed-based funding mechanisms. This effort originated out of frustration with inadequate funding for implementing salmon recovery plans, and securing additional, stable, predictable funding to help keep salmon recovery on track is an important component of a robust, integrated funding strategy for Puget Sound recovery. Federal, state, and local funding all need to work together to meet the challenges we face to recovery salmon and restore Puget Sound

We recommend that implementation of the Puget Sound Salmon Recovery Plan be clearly identified as one of the strategic initiatives identified in the Action Agenda update. As written currently the habitat protection strategic initiative encompasses some of what must be done for the implementation of the Puget Sound Salmon Recovery Plan, but not all. We are concerned that the Action Agenda update section focused on salmon recovery (Section A9 Protect and Recover Salmon) does not include any specific near-term actions based on the well-known priorities identified for salmon

recovery. At a minimum, this section should reference the existing priorities called for in watershed's salmon recovery plans, and emphasize support for implementing the highest priority actions.

In addition to the comments in this letter, please also see attached additional specific comments on the content of the Action Agenda update. Again, we appreciate the opportunity to comment and look forward to continuing to work with the Puget Sound Partnership and other partners to advance implementation of critical salmon recovery priorities as part of restoring Puget Sound.

We request that Jean White, the Lake Washington/Cedar/Sammamish Watershed Coordinator, be our point of contact for additional communication regarding the Action Agenda update process. Her email address is [jean.white@kingcounty.gov](mailto:jean.white@kingcounty.gov) and her phone number is 206-263-6458.

Sincerely,

A handwritten signature in black ink, appearing to read "Donald L. Davidson". The signature is fluid and cursive, with the first name "Donald" being the most prominent.

Dr. Don Davidson, DDS  
Councilmember, City of Bellevue  
Chair, WRIA 8 Salmon Recovery Council

Cc:

Martha Neuman, Planning Manager, Puget Sound Partnership  
Jeanette Dorner, Salmon and Ecosystem Recovery Director, Puget Sound Partnership  
Susan O'Neil, Ecosystem Recovery Coordinator, Puget Sound Partnership  
Fred Jarrett, South Central Action Area Caucus Group Chair (Deputy King County Executive)  
Members of the WRIA 8 Salmon Recovery Council

## More Detailed WRIA 8 Comments on PSP Action Agenda Update

1. An important goal for this Action Agenda (AA) update from the perspective of the Puget Sound Watershed Leads Group and Puget Sound Salmon Recovery Council was to have better integration of the Puget Sound Chinook Recovery Plan into the overall Action Agenda strategies. We appreciate that the cross-cutting issues between salmon recovery and overall Puget Sound recovery are now much clearer than in the original AA.
2. It is also good that the Funding Strategy (p. 298, #6) includes the development of a legislative strategy to adopt a local funding mechanism and acknowledges the work in the South Central Puget Sound WRIAs on watershed-based funding mechanisms. This effort originated in King County (WRIA 9 in particular) out of frustration with the inadequate funding for implementation of WRIA salmon plans.
3. Section A9 Protect and Recovery Salmon, p. 92. It is concerning that no specific near-term actions have been identified for salmon recovery (on p. 96 and p. 98). At a minimum, this section should reference that the existing salmon plans all identify priorities in salmon recovery and that the highest priorities for in each action area should be pursued. Many of the near term actions in other sections do relate to salmon. These near term actions should be referenced in this section to avoid the impression that there is a lack of urgency for near term action for salmon recovery.
4. In section A9-3, "Maintain and enhance the community infrastructure that supports salmon recovery" says that the near term focus will be on implementing ongoing programs (p. 98). Based on the Tribal White Paper and NOAA's Five Year Review of Implementation of the Puget Sound Chinook Recovery Plan, existing programs have been inadequate to protect habitat for salmon and much more needs to be done. The Puget Sound Salmon Recovery Council's current efforts to identify near-term actions that the federal, state and local partners will do to improve habitat protection should be added here as a near term action.
5. A key missing category under the list of Action Agenda Strategy Categories with a Strong Salmon Recovery Nexus on p. 94 is C1 Reduce the Sources of Toxic Chemicals entering Puget Sound.
6. Table 5 in the Executive Summary (p. 16) needs to be placed in better context. Explain how this table was developed (seems to be a roll up of local priorities from the LIOs). It needs to be better formatted, synthesized and summarized to be more understandable before it can be prioritized in a meaningful way. It could be sorted by geographic area and/or topic. It should be better linked to Table 4. Currently it reads too much like an uneven laundry list. The final prioritized list should be much shorter and clearer than what is in Table 5 as potential actions.

7. A bigger picture comment is that much of the work of this Action Agenda Update has been put off to the future. It will be a huge task to prioritize the near term actions. Page 4 2012 Prioritized List of Near Term Actions sections states that the final AA will be listed in priority order. Creating a list 1-200 is going to be challenging as there will be too many apples to oranges comparisons and the range of potential near term actions is quite broad from land use regulations to habitat restoration projects. It is not clear in the description of the prioritization process p. 22-27 if the plan is to have one list in priority order across all the goals or to have the actions under each goal prioritized. The actions should be prioritized and sequenced under each goal. That will avoid some of the apples to oranges comparisons, make better use of expert opinion and the interdisciplinary teams that have been formed around specific goals, and reduce the amount of unproductive process and hairsplitting about what's most important. In the end we are going to need a combination of actions and action types to recover Puget Sound and salmon.
8. P. 24 Near Term Actions Not Included in Priority Setting: First bullet says that local actions will not be included in the priority setting because they have already been prioritized and incorporated into the AA. This is confusing. Isn't the Table 5 of potential Near Term Actions in the Executive Summary a roll up of priorities identified at the local level? This needs to be clarified as does what is Table 5.
9. On p. 25, example criteria for prioritization: it is going to be difficult to use the same criteria for programmatic actions like land use regulations as for site-specific restoration actions. PSP may want to use some different criteria for site specific habitat actions versus programmatic actions. For example under example criteria #1, by having the measure be the % an action would mitigate a pressure, this criteria will likely be skewed to only Puget Sound wide programs ever being ranked Very High or High. For example, if you ran the very significant Nisqually Estuary Restoration through these criteria it seems like it would rank low.
10. P. 24 says that sensitivity analysis can be performed to determine how different weighting might change the prioritization results. We agree that any proposed criteria and weighting should be tested to avoid unintended results.
11. P. 298 second bullet under Ongoing Programs references PSP working with Hood Canal, Pierce County and Thurston County on an in-lieu-fee mitigation program. King County is also working on an in-lieu-fee mitigation program that should be referenced here.
12. P. 364, last bullet. Not clear what "Toxics and excess nutrients in the marketplace" mean. Clarify or delete "in the marketplace."