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Cedar River Council  
 Friends of the Cedar River Watershed  
 Friends of the Issaquah Salmon Hatchery  
 Greater Seattle Chamber of Commerce  
 Long Live the Kings  
 Mid-Sound Fisheries Enhancement Group  
 Mountains to Sound Greenway  
 Northwest Marine Trade Association  
 Sno-King Watershed Council  
 Trout Unlimited  
 Water Tenders

Alderwood Water and Wastewater District  
 National Oceanic and Atmospheric Administration  
 US Army Corps of Engineers  
 Washington Departments:  
 Ecology  
 Fish and Wildlife  
 Natural Resources  
 Washington Association of Sewer and Water Districts  
 King Conservation District

October 15, 2018

Sheida Sahandy  
 Puget Sound Partnership  
 326 East D St  
 Tacoma, WA 98421



RE: Comments on the Draft 2018-2022 Action Agenda for Puget Sound

Dear Ms. Sahandy,

On behalf of the Lake Washington/Cedar/Sammamish Watershed (WRIA 8) Salmon Recovery Council (Council), we appreciate the opportunity to submit comments on the draft 2018-2022 Action Agenda for Puget Sound (Action Agenda). The WRIA 8 Council is comprised of 28 local governments and stakeholder representatives from businesses, community groups, concerned citizens, and state and federal agencies who have been working collaboratively since 2000 to recover Chinook salmon in our watershed.

Since the inception of the Puget Sound Partnership (PSP) in 2007 and the release of the first Action Agenda in 2008, WRIA 8 has been involved in the process to identify and develop Puget Sound recovery priorities and currently participates as a member of the Puget Sound Salmon Recovery Council, South Central Caucus Group Local Integrating Organization, and is the Lead Entity for salmon recovery in WRIA 8. It is from this perspective that we offer the following comments.

**Improved clarity of recovery framework and usefulness of the document**

Overall, the draft 2018-2022 Action Agenda is an improvement over the 2016-2018 version and earlier versions of the document in several important ways. First, dividing the Action Agenda into two components, a Comprehensive Plan and an Implementation Plan, makes the document more clear and useful. Second, the threats and pressures to the health of Puget Sound are more clearly and directly presented and discussed. Third, the description of the recovery framework is improved, more clearly linking recovery goals, vital signs, implementation strategies, regional priorities and approaches, and ongoing programs and near-term actions. Fourth, there is a compelling and urgent call to action. Fifth, PSP significantly improved the process for developing, submitting, and evaluating near-term actions (NTAs) for inclusion in the 2018 Action Agenda update.

**Integrate salmon recovery and Puget Sound recovery**

Salmon recovery is a cornerstone of Puget Sound recovery. Integration of the two is fundamental. Whereas previous versions of the Action Agenda acknowledged salmon recovery, the emphasis tended to be on actions outside salmon habitat protection and restoration priorities called for in watershed-based recovery plans. We appreciate that the 2018 update more fully embraces the Puget Sound Salmon Recovery Plan and salmon recovery priorities and calls for coordinating overall investment and implementation of Puget Sound and salmon recovery.

The discussion could be further strengthened by the following:

- In the discussion of salmon recovery Lead Entities in the Comprehensive Plan (p.35), include a reference to the law that establishes Lead Entities in statute (RCW 77.85), to fully acknowledge the Lead Entity role in coordinating salmon recovery at the local, watershed scale. This is consistent with the reference to the statute that identifies the Leadership Council as the Puget Sound regional organization for salmon recovery.
- Clarify the description of how Lead Entity four-year work plans are supported as part of the Action Agenda, and include a link to them. There was confusion during the solicitation for near-term actions (NTAs) about whether salmon recovery capital actions should or needed to submit as a NTA to be supported for funding through the Action Agenda. Unfortunately, this created a situation where some projects are NTAs, but many others are not.

WRIA 8 supports continued focus by PSP and partners to more fully integrate salmon recovery priorities and processes in Puget Sound recovery.

#### **Ensure Puget Sound recovery is science-based and grounded in adaptive management**

The draft 2018 Action Agenda update emphasizes that recovery is driven by science and includes a more robust and clear adaptive management strategy than previous iterations. The draft document includes improved linkages between goals, vital signs, implementation strategies and actions, and a more clear approach for measuring and reporting progress and making course corrections. Further work is necessary, and the Action Agenda should include actions to identify regional monitoring priorities, better coordinate monitoring of habitat and environmental conditions at the local and regional scales, and identify data sharing opportunities and make efficient use of limited monitoring resources. PSP should work with partners to modify and better define some vital sign targets and indicators so that they convey progress on an appropriate timeline for reporting and to inform decision-making. For example, while Chinook salmon abundance is the ultimate measure of de-listing and recovery, detecting trends in abundance typically requires at least four generations, or roughly 20 years of gathering annual data. Therefore, this indicator timeline for detecting change does not align well with annual or biannual reporting.

#### **Strengthen the description of the contribution of “Ongoing Programs” to Puget Sound recovery**

Implementation of Puget Sound recovery predominantly occurs at the local level, by local governments, tribes, businesses, and community organizations. The Implementation Plan (Chapter 5, “Ongoing Programs for Puget Sound”) includes detailed descriptions of various specific state and federal funding sources, but significantly understates the contribution of local level funding and implementation. Although the list of NTAs include many valuable and important actions, WRIA 8 supports the recognition in the Implementation Plan (Chapter 5) of the importance of continuing to fund ongoing programs, including implementation of salmon recovery Lead Entity four-year work plans. PSP should consider expanding the description of the value and contribution of ongoing programs to Puget Sound recovery, especially work at the local scale. One place where the NTA process was confusing for partners was understanding how salmon recovery capital projects are captured in, and supported by, the Action Agenda. Based on guidance from PSP and the Strategic Initiative Leads, many partners did not submit salmon capital projects as NTAs; however, some did. Consequently, the Action Agenda inconsistently reflects these projects and the list of NTAs does not represent the full picture of discrete actions

necessary for Puget Sound recovery. Therefore, estimates of the recovery funding gap based on the NTAs will underrepresent the true funding need.

**Prioritize developing a funding strategy to meaningfully increase funding for recovery**

The 2018 Action Agenda update appropriately acknowledges the lack of funding as the primary obstacle to implementing recovery actions and emphasizes that greater investment is needed to make progress to meet recovery goals. WRIA 8 encourages PSP to prioritize developing the funding strategy described in the 2018 Action Agenda, particularly building on prior efforts to estimate the recovery funding need and focusing on identifying and developing new funding mechanisms/sources to support recovery. Additional funding strategy comments include:

- PSP should be more proactive in exercising its statutory role to prioritize and recommend to the Governor state agency project and program funding requests to inform development of the Governor’s budget ahead of each biennial legislative session. This should be coupled with early coordination with state agencies during the development of their agency budget requests.
- While it is worth pursuing private philanthropic funding to support implementation of recovery actions, as called for in the 2018 update, this type of funding often requires a large investment of time relative to the amount of funding and often supports discrete projects rather than applying to multiple projects over a broad area or to ongoing programmatic funding needs. Consequently, it is important for the Puget Sound funding strategy to go beyond seeking private philanthropic investment to consider and develop new funding mechanisms/sources that can provide significant, sustainable funding to make progress on recovery over time.
- As a “backbone organization” PSP needs to champion implementation of local actions by securing additional resources to support ongoing programs and build on local actions to address gaps and regional-scale priorities.
- WRIA 8 is encouraged that the Leadership Council made “funding” a regional priority. To advance this priority and PSP’s “Mobilizing Funding” initiative, the Leadership Council and PSP should actively work with partners to identify new funding sources. In particular, as part of a funding strategy, WRIA 8 encourages coordination with the Puget Sound Salmon Recovery Council, which has convened a Funding Subcommittee to identify a viable funding concept and strategy to generate significant additional funding to increase the pace of salmon recovery.

We appreciate the challenge of developing a plan that comprehensively directs Puget Sound recovery, which is inherently multi-faceted, complex, involves numerous partners and entities, and is not supported by dedicated resources. The 2018-2022 Action Agenda builds on past iterations of the plan and reflects previous partner comments and integrates lessons learned to produce a more effective and useful document. Thank you again for the opportunity to comment. We look forward to continuing to work with PSP and other partners to meet salmon recovery and Puget Sound recovery goals. If you have any questions about these comments or about salmon recovery in WRIA 8, please contact Jason Mulvihill-Kuntz, WRIA 8 Salmon Recovery Manager, at [jason.mulvihill-kuntz@kingcounty.gov](mailto:jason.mulvihill-kuntz@kingcounty.gov) or 206-477-4780.

Sahandy  
October 15, 2018  
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Sincerely,

Handwritten signature of John Stokes in black ink.

John Stokes  
Chair, WRIA 8 Salmon Recovery Council  
Councilmember, City of Bellevue

Handwritten signature of Mark Phillips in black ink.

Mark Phillips  
Vice-Chair, WRIA 8 Salmon Recovery Council  
Councilmember, City of Lake Forest Park

Cc: Lake Washington/Cedar/Sammamish Watershed Salmon Recovery Council members  
Jason Mulvihill-Kuntz, Salmon Recovery Manager, Lake Washington/Cedar/Sammamish  
Watershed