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October 5, 2011

Gerry O'Keefe

Executive Director

Puget Sound Partnership

326 East D Street

Tacoma, WA 98421

RE: Action Agenda Update – Local Priorities for South Central Puget Sound Action Area

Dear Gerry,

I am writing on behalf of the South Central Puget Sound Action Area Caucus Group to share our local priorities for inclusion in the Action Agenda update.

The South Central Action Area includes WRIs 8, 9, and 10, and encompasses highly developed urban areas, rural areas, and resource lands. This region has a strong-track record of watershed-scale collaboration to protect and restore salmon.

Our Caucus Group spent nearly a year working through the 144 actions in the Action Agenda, discussing how they play out in our local watersheds and larger Action Area, and identifying a top tier of 8 actions. We then developed more specific action plans for the top priorities and identified the accountable parties. We've now taken the next step of translating this work into the local action tables requested by the Partnership.

In transmitting these tables, I wanted to share some of the key themes and recommendations coming out of our Caucus Group:

Local land use and environmental standards are where the "rubber hits the road" for habitat; we need leadership from the Partnership and state agencies to better align minimum standards and funding with the Action Agenda: Local governments will shape future habitat conditions and functions through their growth management practices, stormwater regulations, floodplain development regulations, and shoreline master programs. Minimum standards adopted by state agencies like Department of Ecology help shape these local standards. Many jurisdictions are in the process of updating their regulations for shorelines, floodplains, and stormwater, and these actions will "cast the die" for habitat and water quality for decades to come. We'd like to see better alignment between state standards and the targets being set for Puget Sound recovery. For example, what shoreline management standards need to be in place to reverse the trend on shoreline armoring? How can state budgets more clearly focus resources on shoreline retrofits and research on "soft armoring"? What mechanisms will be put in place to ensure that that local plans and standards tie back to, and advance the Action Agenda and Recovery Targets?

How can grant funding be used to recognize and create incentives for local governments to update regulations in a way that will contribute to progress in meeting recovery targets?

One-size-fits solutions won't work: Our watersheds encompass a wide range of land uses and development patterns from urban shorelines with almost 100 % armoring to long reaches of undeveloped shoreline in the upper watershed. The desired outcomes –and package of actions – need to be tailored to different areas while working toward a Soundwide target. Shoreline armoring is again a good example. In highly urbanized areas, the focus may need to be on creating incentives for private property owners to retrofit shoreline armoring using “soft” techniques rather than pushing for extensive removal. In less developed areas, the focus could be on purchase of conservation easements so that development can be set back and not create the need for bank stabilization. With respect to stormwater management, the mix of more traditional constructed stormwater facilities and Low Impact Development techniques will be influenced by land availability in highly urbanized areas vs. less developed areas.

Regulatory and funding silos need to be broken down: Local governments are making, and will continue to make significant investments to control Combined Sewer Overflows, clean-up Superfund Sites, upgrade sewage treatment plants, control stormwater, and restore habitat. We should be looking for opportunities to link projects (e.g., CSO projects with adjacent Superfund Clean-up or habitat restoration) to ensure maximum benefit for our public investments. At the Puget Sound scale, the Partnership should be identifying the full range of current regulatory requirements, investments, and intended outcomes and helping to convene a discussion about how these requirements and investments collectively can generate the most benefit for Puget Sound.

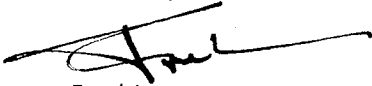
The state and region need to renew their commitment to funding habitat protection and restoration projects and programs in adopted watershed-based salmon recovery plans and supporting changes to land use practices: When the Shared Strategy was merged with the Puget Sound Partnership, it was with a commitment that energy and attention to salmon recovery would not be diminished. The recent status review of salmon recovery plan implementation highlighted the lack of progress on habitat protection and restoration. The causes of this lack of progress are lack of dedicated funding and the slow process in changing land use regulations. Forest cover continues to be lost, while new impervious surface for roads, sidewalks, and development increases. Unless we make a concerted effort to address these issues, we are likely to see similar outcomes from Action Agenda implementation. The Caucus Group would like to see the Partnership more actively advocate for federal and state funding (including preserving current funding) for salmon recovery, and develop an integrated funding strategy for Puget Sound with salmon recovery needs as a central element along with stormwater. The funding strategy should go hand in-hand with land use and regulatory changes that will prevent further reductions in habitat and water quality functions.

Advocate for state and federal funding support for known stormwater investment needs; develop a clearer Soundwide picture of stormwater retrofit, operations, maintenance, and source control needs and priorities: We have clearly identified needs and priorities for salmon habitat protection and restoration, and many local governments (particularly “Phase 1” NPDES permit holders) have identified specific needs for stormwater operations, maintenance, capital projects, and monitoring. Initial estimates of stormwater retrofit needs have been conducted at a Soundwide scale. However, to make a successful case for state and federal funding, we need a more refined assessment of total need and priorities across Puget Sound for stormwater retrofits, operation, and maintenance, and source control. Progress is being made on refining these needs through EPA-grant funded analyses of stormwater retrofit needs. PSP and state agencies should advocate for funding of high priority, known needs (e.g., where needs clearly identified through NPDES permits or transportation inventories), and continue to

refine and continue to refine costs estimates and priorities for stormwater retrofits at a Soundwide scale.

We would be happy to meet with Partnership staff to walk through our Caucus Group priorities in more detail, and look forward to reviewing the draft Action Agenda Update.

Sincerely,

A handwritten signature in black ink, appearing to read "Fred Jarrett", with a long horizontal flourish extending to the right.

Fred Jarrett

Deputy King County Executive

cc: South Central Puget Sound Caucus Group Members
Martha Kongsgaard, Chair, Leadership Council
Martha Neuman, Planning Manager, PSP
Jeanette, Dorner, Program Director, Salmon and Ecosystem Recovery
Scott Williamson, Interim Ecosystem Recovery Coordinator, South Central Puget Sound Action Area