Alliance for a Healthy South Sound Local Integrating Organization 5-Year Ecosystem Recovery Plan – First Elements

Comments by Strategic Initiative Transition Teams November 20, 2015

Section 1. Overview

Excellent emphasis on the geography and ecological processes that make the LIO unique, including good maps and background information. November presentation provided an excellent overview of local issues.

Provide clarity on the relationship between the South Sound Strategy and the 2- and 5-year recovery plans. Clarify whether the South Sound Strategy will be the 5-year recovery plan or if it will be a longer term strategy used to inform the 5-year plan.

Provide a more detailed description of the organization of the LIO (e.g., technical team and executive committee), as well as an overview of the history of the LIO and other collaborative ecosystem recovery efforts that existed prior to the LIO.

Consider expanding discussion of natural resources supported in south sound. The November presentation provided significant background information that was not included in the narrative regarding summer chum, forage fish, early juvenile salmon survival challenges, etc. This coupled with data on recent and projected population growth and economic considerations should help strengthen story of why recovery efforts are necessary.

Given the growth projections in the action area, the LIO should consider land use and growth management approaches to preventing new stormwater problems. Protection should be a central to the LIO strategy.

The description of shellfish cultural and economic value is good, but the figures used are statewide values. This is important, since we know this LIO is disproportionately a larger player in shellfish bed acres and economic impact. Consider capitalizing on that difference by presenting local (LIO) values (% of 2,700 employment) even if broad approximation.

Improve the discussion of the scope of stormwater to better align with the proposed sub-strategies. As written, the sub-strategies did not seem to address the scope described in the narrative and the growth projections in South Sound.

Good detail on salmon recovery, narrative could benefit from similar treatment of stormwater and shellfish.

While generally well done, the plan is very broad. Consider doing additional work to determine priorities to align with the reality of funding limitations and what can really be accomplished in the next five years. While it is understood that everyone in the LIO has their own areas of concern, the process should get to some sort of prioritization consensus.

Consider improving the results chains for stormwater. Consider stormwater as an area where more could be done, or where a more robust strategy could be developed.

Stormwater education might not be an effective strategy for behavior change. Recommend shifting focus to social marketing and behavior change focus, with an important component being behavioral economics.

Section 2. Priority Vital Signs and Pressures

<u>Priority vital signs.</u> It seems unlikely that all 11 vital signs identified are of equal priority. Consider distinguishing different tiers of priority vital signs that will assist in further prioritization. While acknowledging the need for inclusivity and a democratic process to sustain political will, carefully consider what can realistically be accomplished in the plan timeframe and let that guide further prioritization.

Selected priority vital signs include a combination of endpoint and intermediate vital signs. Given overlap and connections between various vital signs, consider consolidating into fewer near term priorities to provide focus. For example, managing OSS is a priority approach to addressing shellfish beds. Both priority vital signs may not be needed since one is the primary approach to another. Thinking about sequencing may also be helpful for narrowing focus.

Provide additional descriptions of vital signs selected and geographic priorities in south sound.

<u>Priority pressures.</u> Reviewers appreciated the challenge of prioritizing pressures due to how they operate on a series of nested spatial and temporal scales. Good, systematic description of how the list of priority pressures was developed. Reviewers appreciated the effort to group interrelated pressures.

Clarify why two additional stressors were approved by the executive committee that were identified in only one of the local assessments.

Provide additional clarity on how pressures were prioritized and binned as described on p. 9. It seems that bin 1 should be "identified in both local assessments" and bin 2 "identified in just one of the local assessments".

For the 5-year plan, consider discussing the general status of the vital signs and pressures (e.g., are we talking largely legacy impacts or are these ongoing?). Also suggest, if possible, describing the magnitude of impact local restoration efforts could have on regional targets.

<u>Decision-making process.</u> Good involvement of tribes, elected officials and businesses. Reviewers appreciated the seven decision-making principles. Other than the use of these principles, clarify how information was used to select vital signs and pressures.

Consider discussing alignment and discrepancies between the different pressure assessments. A number of pressures from bin 2 were added due to known local importance. A discussion of why these might not have been captured in both assessments would help validate process. Additional prioritization of the plan will be important.

Section 3. Local Ecosystem Recovery Approaches

<u>Priority vital signs.</u> In general, figure presentations were excellent. Reviewers appreciated the work in rebuilding the models and the ties to sub-strategies in many of the discussions. Consider structuring each of the approaches according to the following outline: 1) current status, 2) efforts/accomplishments to date, 3) key barriers to success, 4) future focus areas.

- OSS. Include enforcement and sustainable funding as critical elements. November 2015
 presentation included a concern for the level of regulations around OSS in this area. Strengthen
 regulations if necessary to meeting state requirements.
- <u>Swimming beaches.</u> Consider a more specific discussion of swimming beaches, including particular issues, closures, etc.
- Shellfish beds. Link actions directly to shellfish bed acreage to be protected and recovered, including:
 - o acreage that can be upgraded
 - areas that need to be protected
 - how the LIO can help partners prevent and strategize around the downgrades that have been occurring over the past year
 - o eliminating WWTP overflows

Recommend that the LIO add specific shellfish acreage (number and location) for protection and restoration. DOH documents (shellfish threatened areas, shellfish acreage by county, shellfish restoration table) are provided to help LIOs estimate local shellfish recovery targets.

- Human wellbeing. Area has lower population but high level of development. Consider including
 identified growth management targets and describe the diversity of rules between various
 County governments. Identify if LIO can help address regulatory discrepancies and opportunities
 for improvement across different areas.
- <u>Pacific herring.</u> Consider that production or capacity for multiple species is unknown. Consider making WDFW pilot study on forage fish available to other LIOs that may benefit from the findings.
- <u>Chinook salmon/Orca</u>. Clarify how LIO would have a direct impact on orcas. Distinguish between
 approaches for Chinook/multi-species recovery and consider relative merits of having both vital
 signs as priority approaches. Consider focusing on Chinook vital sign since local efforts seem to
 be targeting salmon recovery. Orca are an additional endpoint that is expected to benefit from
 salmon recovery, but seems one-step removed from the local prioritization process for recovery
 needs.

Clarify how recovery efforts will be prioritized among watersheds, and whether there are several watersheds which are the highest priority in the 2-5 year range.

Suggest recovery approach focuses on habitat-related constraints and incorporates water

quality/stormwater issues by reference to avoid duplication with the stormwater strategic initiative.

Consider organizing the approach based on freshwater habitat versus marine habitat constraints. Suggest expanding narrative to capture more of the detail included in the schematic. In addition, in final 5-year plan it will be helpful to discuss the relative importance of impact pathways and potential sequencing of actions in order to maximize return on investment.

Given the interrelatedness between various vital signs, suggest organizing sub-strategies based on vital sign of largest impact to reduce redundancy. For example, some sub-strategies are repetitive between floodplains and water quality. Recommend simply incorporating content by reference to avoid repetition in document. Another potential option is to discuss sub-strategies with the over-arching description of the approach to the three strategic initiatives.

• <u>Estuaries.</u> Good focused and specific package of estuary restoration projects. Reviewers appreciated seeing the Capitol Lake dam proposed for removal, noting that the difficulty of accomplishing needed actions should not result in failing to identify them. Clarify why this vital sign was combined with shoreline armoring in the narrative.

Clarify the amount of large scale delta/estuary work anticipated in the near term. Reviewers suggested that much of the large scale tidal inundation work that would contribute to the regional estuary target has been completed. If so, consider removing estuary vital sign as a "priority vital sign" and simply emphasizing pocket estuary restoration as a priority pathway through which the LIO will be targeting Chinook recovery.

- <u>Floodplains</u>. Good detail provided, including target of specific geographies within the LIO to be
 the focus of the work. Clarify the differences and similarities between the approaches to
 floodplains and land cover, ensuring that differences are large enough to warrant separation.
 Reporting on progress could be more challenging on combined vital signs. Integration between
 vital signs could be captured in each of the three strategic initiatives.
- <u>Land development and cover.</u> Good detail provided, including the description of the processes
 to be used in recovery and incorporating sub-strategies from habitat, shellfish and stormwater.
 Consider including a discussion of the extent to which local actions could advance regional goals
 that are outlined in the text. Consider using table format only to summarize contributions of
 vital signs to regional recovery targets.

Area has lower population but high level of development. Consider including identified growth management targets and describe the diversity of rules between various County governments. Identify if LIO can help address regulatory discrepancies and opportunities for improvement across different areas.

• Shoreline armoring. Reviewers appreciated that the current narrative highlights a number of important opportunities for estuary restoration. Clarify if "enable and encourage informed stewardship actions" means expanding outreach and education related to armor avoidance

strategies. This appears to be a gap in the current efforts that is an important part of a comprehensive strategy to reducing armoring within the LIO.

Clarify the LIO status relative to the regional goal of net reduction in armoring. This information would help with provide context for moving forward. Consider including a clear summary of current barriers to restoration that need to be overcome in order to be successful. Describe how shoreline armor removal and estuary projects being prioritized within the LIO.

Consider the merits of separating approaches towards these vital signs. If opportunities, challenges and barriers to recovery are very similar, it might be appropriate to combine approaches. If not, it might be cleaner to separate.

• <u>Freshwater quality</u>. Sub-strategies were incorporated in the schematics from habitat and stormwater. This highlighted the cross-cutting nature of freshwater quality. The target should be tied back to a vital sign indicator. Using "reduction in impaired waters" is likely not going to illustrate meaningful change in actual water quality in Puget Sound or the LIO.

Strategic Initiatives: Stormwater

Good connection between current and past actions. Reviewers appreciated the link between substrategies in the discussion, and the acknowledgement of relationships with habitat and shellfish. Clearly the LIO understands the sub-strategies and what they are trying to achieve. Discussion is high level even for NTAs that are currently underway. Consider including more specifics on current NTAs.

November presentation recognized links between habitat and stormwater. Consider including that in the narrative as well.

Approach is largely focused on continuation of existing programs. Consider including plans for future approaches, and clarify if new NTAs will also be used to advance stormwater.

Strategic Initiatives: Habitat

The approach provides good detail, and the nearshore assessment tool is an excellent example of how a strategic approach should build off existing investments and incorporate best available science. Consider opportunities to summarize information into tables.

Consider capturing interconnectedness between vital signs with the schematic. For example, improvement in estuaries will benefit Chinook.

With respect to structure, relationships and science construct, it is critical to understand the effectiveness of current regulations in protecting critical habitats. This seems to be an area that warrants additional consideration in the various recovery approaches to ensure that ongoing impacts do not undermine recovery investments.

Consider identifying and describing the decision-critical science gaps that need to be addressed to better inform recovery efforts. Consider relationships between local and regional approaches, and the need for coordination (e.g., orcas).

Strategic Initiatives: Shellfish

Increase the detail in the text to mirror some of the language in the habitat strategic initiative and provide a more balanced treatment for each strategic initiative. Consider using an intro that covers all three strategic initiatives, then follow with each strategic initiative approach discussion.

Include sustainable local-source funding strategies that address identified barriers, and plan for sufficient capacity for enforcement.

Include a discussion about gaps in past efforts, including funding and enforcement.